

DONNELLEY FINANCIAL SOLUTIONS, INC.

PRINCIPLES OF ETHICAL BUSINESS CONDUCT

Our Principles of Ethical Business Conduct capture DFIN's worldwide code of conduct. These Principles apply to all of us – directors, officers, and employees. Our business ethics and practices are not merely concepts captured in a policy or posted on a website, to be read once a year. They reflect our commitment to the highest standards of integrity in our relationships with one another and with clients, suppliers, stockholders and others in the communities where we live and work. They are the foundation upon which DFIN conducts business.

Each director and employee is expected to read the Principles carefully and show, through words and actions, personal commitment to these standards. This is true regardless of your role or position within DFIN. Of course, no code of conduct can anticipate and address every situation. In many cases, common sense and good judgment will be your best guide. Whatever you do, remember that ultimately, your conduct is your responsibility.

We all share a responsibility to understand and follow these Principles. When you act on the company's behalf, DFIN's reputation for honesty and integrity is in your hands. If you have any questions – either as you read these Principles, or as you conduct your daily business as a DFIN employee – please consult with your supervisor, manager or a member of our Human Resources or Legal Departments.

Daniel N. Leib
Chief Executive Officer

November 14, 2023

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Introduction

DFIN has implemented these principles of ethical business conduct to ensure its business is conducted with integrity and in compliance with the law. Every employee, whether in the United States or in another country, and every member of the Board of Directors is expected to understand and follow the policies outlined here. For ease of reading, the term “employee” includes officers and will be deemed, for this policy’s purposes only, to include the members of the Board of Directors.

Violating the law could subject DFIN and the individuals involved to criminal proceedings, regulatory action and private lawsuits. Any employee who violates these policies is subject to disciplinary action, up to and including termination.

Employees who violate the law can be penalized and may be subject to substantial fines, significant prison terms and repayment of any funds related to the underlying violation.

For the company, violating the law can mean sizeable fines and penalties, the loss of important clients and disqualification from contracting on government work.

DFIN requires training of certain employee groups on several substantive areas of Ethics and Compliance. It is the employee's obligation to complete the training and act in accordance with that training.

We have monitoring procedures designed to detect unethical or illegal practices. However, if you become aware of an ethical or legal violation, including violation of these policies, you have an obligation to report it to the company as described under “Monitoring and Reporting of Violations.”

The Chief Compliance Officer must approve any waiver of this policy, in writing. Waivers of this policy may also require approval of the Board of Directors (or a designated committee) and will be disclosed to the extent required by applicable law or regulation.

Our Supplier Code of Conduct sets out DFIN’s principles and expectations for organizations who supply goods and services to DFIN, including their representatives, agents and employees. All vendors and suppliers are to conduct business with DFIN in a way that is consistent with our company values and the Principles of Ethical Business Conduct that are outlined in this guide.

If you are unsure whether a particular situation or activity amounts to a violation of law or a violation of a company policy, review the applicable company policy (available on the intranet, [DFIN Policies](#)), and if you still have questions, consult with your supervisor

or manager, the Chief Compliance Officer or other member of the Legal Department before doing anything.

Ethical and Lawful Behavior

The success of our company rests on our employees. Because of their efforts and dedication, the company has earned a reputation for providing top-quality services in an honest, ethical fashion. We are proud of this reputation, and we must work together to preserve it. This means that we must conduct our business honestly, ethically and in strict compliance with all laws, rules and regulations. It also means that we must operate free of any interest that affects our undivided loyalty to DFIN.

It takes only one unethical or unlawful act to destroy the goodwill the company has earned from suppliers, clients and the public. While it is impossible to catalog every situation that might arise, the following general principles are important:

- Deal with suppliers, clients, employees and competitors on a fair and honest basis. Buying and selling must be done on an “arm’s length” basis, free of any conflicts of interest, kickbacks, bribes, secret commissions, gifts or favors. Do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or other unfair dealings.
- Avoid any situation in which your independent business judgment might appear to be compromised. Charges of bad faith and misdealing may arise in any situation where your personal interests and the company’s interests are not the same. For this reason, employees should not have a financial interest in clients, suppliers or competitors of the company (unless such interest complies with the company’s conflicts of interest policy, contained herein). Employees also may not work for a client, supplier or competitor without prior review and approval of the Chief Compliance Officer.
- Make candid reports to management. Among other things, this requires that reports contain accurate information and that supporting records be properly maintained in accordance with the company’s records management policies and, where applicable, generally accepted accounting principles. It also means that employees must fully and frankly disclose to management anything that might affect the company’s reputation.
- Protect proprietary and/or confidential information. In dealings outside of work, be careful not to divulge important information about the company, its clients, employees, or its business, even accidentally. Examples of information that should not be disclosed:
 - Intellectual property of DFIN;

- Undisclosed financial results;
 - Contract terms;
 - Prices;
 - Information disclosed to the company by clients, suppliers or any other firm with which we do business;
 - The content of any material the company is handling prior to its public distribution and copies of any such material;
 - Employee information covered by privacy laws; and
 - Proposed acquisitions or sales by the company.
- All employees should protect DFIN's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the company's profitability. All company assets should be used for legitimate business purposes.
 - Access to personal information about DFIN employees is restricted to people with a "need to know" and will be transmitted to other employees or third parties only for legitimate and necessary business purposes or to satisfy legitimate investigative or legal requirements and in accordance with [DFIN's Privacy Notice](#). Employees who maintain or are custodians of personal information must ensure that the information is not disclosed inappropriately or misused. No personal information must be retained or stored by DFIN for any period of time that is longer than it is needed to be lawfully and legitimately processed. The obligation to preserve confidential information continues even after employment ends.
 - If you leave the company, your obligation to protect proprietary and confidential information continues. You must not share company or client confidential information with your new employer or anyone else. You may also have certain restrictions on your ability to compete with DFIN for a certain time period or from soliciting, directly or indirectly, employees of the company to leave to join your new employer, and clients of the company from taking their work elsewhere.
 - Employees are prohibited from taking client or company property, including furnished raw materials, in process goods, rejected and/or finished goods, from any DFIN facility, except for authorized business with the client.
 - Remember that client property is not for our use. While samples of finished products are used for certain purposes within the company, they are not for general

distribution to employees or third parties, nor may employees use such products, goods or customer property for any purpose other than the performance of your job.

- Do not duplicate licensed computer software; do not use trademarks that we do not own; and do not reveal trade secrets disclosed to the company. Willful infringement of a copyright or trademark is a crime.
- Keep political activities separate from the company's business. If you decide to make a political contribution (including providing services), it must be done with your personal funds and on your own time. Company stationery or other resources should not be used for personal or political purposes. If an employee is appointed to or decides to run for a governmental office, he or she should first consult with the Chief Compliance Officer to ensure a conflict of interest does not arise.

We also must maintain books and records and accounting controls for the entire company (including our operations outside of the United States) that accurately and fairly reflect our income and expenses. Our employees must follow these accounting controls, which are designed to protect not only against bribes but against the use of company assets in unauthorized ways, such as not recording or obtaining internal managerial authorization for financial transactions and maintaining improper bank accounts.

If you are unsure whether a particular situation or activity amounts to unethical or unlawful behavior, consult with your supervisor, manager, Human Resources, the Chief Compliance Officer or other member of the Legal Department before doing anything.

Conflicts of Interest

General – Consent and Disclosure

No employee of DFIN or its subsidiary companies should have any business, financial, civic, governmental or professional interest outside of DFIN that in any way conflicts with, or appears to conflict with, such employee's ability to perform his or her duties at the company with undivided loyalty, without the express consent of the Chief Compliance Officer. In the event any such conflict has been consented to as provided in this policy, the affected employee must advise all appropriate members of management and, if appropriate, the Audit Committee of the Board of Directors, of any such conflict whenever relevant to business decisions at DFIN in which the affected employee is involved and shall recuse themselves when appropriate.

It is impossible to describe in this policy every situation that may give rise to a conflict of interest and what is set forth below are only some of the situations that may pose conflicts of interest.

Note that for purposes of this policy, a “family member” includes: grandparents, parents (including step and in-law), siblings (including step and in-law), spouse, children (including step and foster), son/daughter in-law, grandchildren, domestic partners and any in-residence relative, or any other relationship that creates an actual conflict of interest and/or the appearance of a conflict of interest.

If you are unsure whether a situation poses a potential conflict of interest with DFIN, you should consult with your supervisor, manager, Human Resources, the Chief Compliance Officer or other member of the Legal Department before doing anything.

Dealings with Outside Companies

Board Membership/Employment by an Outside Company

You may not serve as a board member of, or be employed (as an employee, a consultant or otherwise) by, a competitor, client or supplier of DFIN without the express written consent of the Chief Compliance Officer. A conflict may also arise when your family member is a board member of or employed by a competitor or a client or supplier that has business dealings with DFIN in which you participate or are able to exert influence.

Financial Interests in Outside Companies

You may not allow your personal financial interests to influence, or appear to influence, your independent judgment on behalf of DFIN. This could happen in many ways, but it is most likely to create an appearance of a conflict of interest if you have a personal financial interest in a client or supplier of the company and your decisions as an employee of DFIN may have a business impact on this outside party or any competitor.

- A personal financial interest includes a personal investment held in your name individually or through a broker, or held through ownership by your family members, in their names individually or through a broker. A personal financial interest does not include an investment held through a mutual fund or a blind trust.
- You and your family members must not have personal financial interests in competitors, clients or suppliers of DFIN if such interests are material and the interest would influence, or appear to influence, your independent judgment on behalf of DFIN. Generally, a personal equity investment in an outside company will be deemed material if the combined value of the stock or rights to acquire stock owned by you and your family members is more than your gross annual earnings from the company or the stock owned by you and your

family members is more than five percent of the capital stock entitled to vote in the election of directors of such outside company. If the interest is not an equity investment (for example, a loan to the outside company), it will be deemed material if the investment by you and your family members on a combined basis is more than your gross annual earnings from DFIN.

Business with Outside Companies

You may not use personal influence to get DFIN to do business with a company in which your family members or friends have a personal financial or other interest. You or your family members may not act as an independent supplier of goods or services to DFIN, without review and approval of the Chief Compliance Officer prior to engagement. Any such transaction, if approved, shall be conducted at “arm’s length.”

Abuses of Business Opportunities and Confidential Information

You must not use for personal gain, or for the benefit of anyone or any entity outside of DFIN, knowledge of business opportunities or ventures or confidential information about the company or clients if such knowledge is gained or developed through your employment with DFIN. You may not directly or indirectly buy, or otherwise acquire, rights to any property or materials if you know that the company may be interested in pursuing such opportunity.

Civic, Charitable, Governmental and Professional Activities

Employees are encouraged to participate in civic, charitable and professional activities but should be mindful of potential conflicts of interest between DFIN’s interests and the interests of the particular civic, charitable, governmental or professional organization. Employees must also avoid any potential conflicts of interest between their employment with DFIN and their involvement in any governmental activities or programs. Should such conflicts exist or arise, you must report the conflict to the Chief Compliance Officer and refrain from participating in the activity that gives rise to the conflict, unless the Chief Compliance Officer consents in writing to such activity. Any such outside activity must be strictly separated from DFIN employment and should not harm job performance at DFIN.

If you are unsure whether a particular situation or activity amounts to a conflict of interest, consult with your supervisor, manager, Human Resources, the Chief Compliance Officer or other member of the Legal Department before doing anything.

Existing Conflicts and Changes in Circumstance Resulting in Conflicts; Compliance

If you discover, due to changed circumstances, new knowledge or otherwise, that you are involved in a conflict that violates this policy, you must report the conflict to the Chief Compliance Officer and, unless appropriate consents are obtained consistent with this policy, you must eliminate the conflict in the most expedient way possible. An employee who knowingly violates this policy, or fails to resolve an existing conflict in a manner consistent with this policy, is subject to disciplinary action, up to and including separation. DFIN may from time to time request employees to confirm that they are in compliance with this policy.

Gifts

Employees must not accept gifts, favors, loans, entertainment or other gratuitous services from competitors, clients or suppliers of DFIN. A gift or favor would not include loans from financial institutions on customary terms, articles of nominal value ordinarily used for sales promotion or which could not be considered material enough to be a business inducement, ordinary business lunches or other reasonable entertainment where the client, vendor or supplier is in attendance consistent with local social and business custom.

No employee may accept cash, gift cards (other than gift cards for nominal amounts) or cash equivalents of any amount from any person that has business dealings with DFIN.

Under no circumstances may cash payments be made to clients. Other gifts, favors and entertainment extended to clients must be legal and reasonable. If you have questions regarding the appropriateness of any gift, favor or entertainment, you should consult with your Human Resources Manager or the Legal Department. The terms of a client's gift policy must be honored by DFIN without exception.

Employees in a subordinate/supervisory relationship must not exchange favors or gifts that could, or could appear to, give rise to an obligation.

Competing Fairly and Complying with Antitrust Laws

DFIN deals with suppliers, clients, employees and competitors on a fair and honest basis. Buying and selling is done on an "arm's length" basis, free from any kickbacks, bribes, secret commissions, gifts or favors. It is a violation of this policy to take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or other unfair dealings.

The antitrust laws reflect the commitment of governments to a free enterprise system. Supply and demand and vigorous competition give consumers quality services at economical prices. It is the company's policy to comply with all antitrust laws in the United States and in other countries where the company does business.

The criminal provisions of the U.S. antitrust laws prohibit any agreement between competitors regarding prices to be charged, bidding, clients to be solicited or geographic areas to be served. Examples of criminal agreements with competitors include:

- Agreeing upon selling price or list price;
- Exchanging bids with competitors;
- Allocating territories, clients or markets;
- Fixing a price range;
- Setting up a rotation method of bids among competitors;
- Limiting output or restricting delivery schedules; and
- Fixing discounts, rebates or credit terms.

Such agreements may lead to criminal prosecutions of individuals and of the companies they represent. Offenses may lead to penalties for individuals consisting of fines and imprisonment.

Remember that any contact with a competitor is hazardous. Illegal agreements are often proved with evidence of “small talk,” “casual discussions” and “harmless” exchanges of business information.” Avoid such discussions, whether, for example, they occur in a large, formal group or in a social setting following a trade association meeting.

If a competitor raises a topic that you believe might violate the antitrust laws or our policies, you must immediately and firmly decline to discuss it. You must then promptly notify a member of the Legal Department of the event.

If another country’s antitrust and competition laws are more restrictive than those of the United States, you must comply with those laws when they are applicable. In those instances where a country’s laws are more lenient than those of the United States, you should still comply with the principles of the U.S. antitrust and competition laws unless you first consult with a member of the Legal Department.

For further details regarding the antitrust laws and the company’s procedures to comply with them, see the company’s Antitrust Policy. <insert link>

If you are unsure whether a particular situation or activity amounts to a violation of the antitrust laws, consult with the Chief Compliance Officer or other member of the Legal Department before doing anything.

Environmental, Health, and Safety (EHS) Laws

DFIN's [Global Sustainability Policy](#) describes our commitment to operate the business in a manner that protects the environment and the health and well-being of the company's most important asset – our people. Providing a safe work environment has always been one of DFIN's priorities in addition to using the world's natural resources wisely.

We have established a series of EHS standards and procedures that align with ISO 14001 and 45001. These practices define how EHS is managed across global operations where zero EHS incidents and injuries is our goal.

As a global company, we have a responsibility to comply fully with the EHS legal obligations in all countries where we operate. Not only because it is the right thing to do, but also because a violation can be a crime. Furthermore, substance abuse and workplace violence threaten public safety. To assure a safe work environment, the use of illegal drugs and alcohol, the abuse of legal drugs, or violence can result in discipline up to and including separation, whether or not the acts occur in or away from the workplace.

If you are unsure whether a particular situation or activity amounts to a violation of an EHS law, consult the EHS Manager, the Vice President responsible for EHS and Sustainability, the Chief Compliance Officer or other member of the Legal Department before doing anything.

Employee Working Conditions

Forced, bonded or indentured labor or involuntary prison labor shall not be used under any circumstances. All workers will be voluntary, and workers should be free to leave upon reasonable notice. Workers shall not be required to surrender government-issued identification, passports or work permits as a condition of employment.

The use of child labor shall not be permitted under any circumstances. The term "child" refers to any person under the age of 15, under the minimum age for completion of compulsory education, or under the minimum age for employment in any particular country, whichever is highest. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above the country's legal age established for completing compulsory education. We support the use of legitimate workplace apprenticeship, internship and other similar programs that comply with all laws and regulations applicable to such programs.

DFIN fairly compensates its employees by providing wages that are in compliance with the local and national laws of the jurisdictions in which we do business.

DFIN also maintains employee work hours in compliance with local laws and applicable laws of the jurisdictions in which we do business.

Freedom of Association and Collective Bargaining: DFIN recognizes that our employees have the legal right to associate freely and to join a union. Our employees also have a legal right to not join a union. We believe that all parties' interests are best served when we maintain engaging, open, and two-way communication with our employees. Having a positive working relationship with our employees benefits not only them, but our clients and suppliers as well. When questions arise, we believe in answering any questions in an open and honest way. We will protect our employees' right to make an informed choice in accordance with all applicable laws free from any coercion or intimidation.

If you are unsure whether a particular situation or activity is consistent with these policies, consult with your supervisor, manager, Human Resources Manager or Vice President, the Chief Compliance Officer or other member of the Legal Department before doing anything.

Equal Employment Opportunity

As an equal opportunity employer, DFIN's policy is not to discriminate against employees or applicants on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, physical or mental disability, protected Veteran status, or any other characteristic protected by law with regard to any employment practice, including hiring, training, promotion, compensation, job assignments, benefits, or other aspects of employment. In addition, applicants and employees will not be discriminated against based on inquiring about, disclosing, or discussing their compensation or the compensation of other applicants or employees. Employees who have access to the compensation information of other employees as part of their essential job functions are expected to use such information responsibly and only in the furtherance of their job responsibilities. The Company also takes affirmative action to recruit and advance minorities, women, qualified individuals with disabilities and protected veterans.

Employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in filing a complaint; assisting or participating in an investigation, compliance review or hearing, or any other activity related to the administration of any federal, state, or local law regarding equal opportunity.

Further it is the responsibility of each of us to help the company provide a work atmosphere free of harassing, abusive, disrespectful, disorderly, disruptive or other unprofessional conduct. Every employee is expected and required to treat all other employees with respect and dignity.

If you are unsure whether a particular situation or activity is consistent with the company's equal employment opportunity or workplace principles, review the company's equal employment opportunity or workplace policies, and if you still have questions, consult your supervisor, manager, Human Resources Manager or Vice President, the Chief Compliance Officer or other member of the Legal Department before doing anything.

Governments and Government Agencies

The company may have dealings with federal, state, local and foreign governments, both as a supplier of services and as a corporate citizen. Governments are entitled to respect and to be treated with integrity. Statements made and records submitted to government purchasing agents are not to be intentionally misleading or inaccurate. Bids are to be made in good faith. Sufficient care must be taken to ensure proper recording and charging of all costs to the proper account (this includes accurately filling out timecards with the hours worked).

The company's dealings with governments are also to be done at "arm's length." No employee in any country may, directly or indirectly, offer or make any payment, gift, bribe, secret commission or other benefit to influence the decision or action of any government employee, official, candidate or political party, or any private entity with which we seek to do business.

There are numerous laws that regulate the company's lobbying, political outreach, and bestowing of gifts and entertainment to public officials and entities in local jurisdictions, the states, in Congress and the federal executive branch, and abroad. Failure to comply with these laws, even if that failure is inadvertent and caused by lack of awareness of the law, could result in a legal violation, civil and/or criminal penalty, and reputational risk for the company.

If you are unsure whether a particular situation or activity with respect to a government or government agency might constitute a violation of the law, review the company's policies regarding dealings with governments and political activities, and if you still have questions, consult with the Chief Compliance Officer or other member of the Legal Department before doing anything.

Anti-Corruption Laws Including the Foreign Corrupt Practices Act

We cannot, directly or indirectly, pay bribes to or otherwise improperly influence government officials, political parties or candidates for political office, even if such a payment or transfer is requested by a foreign national or called something other than a bribe. We cannot do indirectly what cannot be done directly; improper payments to intermediaries of any kind will not be tolerated.

A violation of this policy, no matter where it occurs and whether you are an employee of the parent company or any of its domestic or international affiliates, may be a violation of United States' law and can subject the company and the individual to fines and other criminal penalties, including incarceration.

Our Anti-Corruption Policy prohibits “facilitating” payments of any kind. A facilitating payment is a small payment to a government employee to expedite or secure performance of a routine non-discretionary governmental action. Such payments are prohibited absent written approval of the Chief Compliance Officer.

For a more detailed statement regarding the company's policies in this area, see the policy entitled “Anti-Corruption Policy.”

Securities Laws and Confidential Information

If investors believe that the price of our company's stock or other securities is subject to unfair manipulation by employees, they will lose faith in us. Additionally, we must protect and not misuse the confidential information of our clients, suppliers and other business partners.

Accordingly, employees who, through their employment, obtain confidential information about the company, its clients, suppliers or others with whom the company may negotiate, may not use the information for their own or others' personal advantage, including friends or family members. This includes “insider trading” – that is, buying or selling stock or other securities issued by the company, its clients, suppliers or other business partners, based on confidential information or attempting to “beat the market” by purchasing or selling stock shortly before, simultaneously with or within a short time after public release of confidential information. Insider trading is a criminal offense, with substantial monetary penalties and jail terms.

Confidential information includes any important information that has not been made available to the public and that provides insight into current or anticipated business activities of the company, its clients, suppliers or other business partners that an

investor would consider helpful in deciding whether to buy or sell stock or other securities.

Some examples of confidential information:

- Potential mergers, acquisitions, joint ventures or restructuring;
- Changes in management or control of the company or another corporation;
- New products or discoveries;
- Financial information, such as pending earnings and dividend announcements;
- Information contained in a client's publication that the company is printing or filing but has not been distributed to the public;
- New contracts or the loss of a contract;
- Plans for securities offerings, splits or repurchases; and
- Research and development activities.

If you are thinking about buying or selling stock or other securities based upon information that might be considered confidential, you must first consult with the [Chief Legal Officer](#).

You should not discuss confidential work matters with friends, relatives or other non-employees, or in public places, such as elevators, public transportation (including airplanes) or restaurants. Do not encourage others to use confidential information to trade in the stock or other securities of the company, its clients, suppliers or other companies with which the company is dealing. All inquiries regarding DFIN from non-employees, such as financial analysts and journalists, should be directed to the head of Investor Relations.

For a more detailed statement of DFIN's policies in these areas, see the company policies covering confidential information, trading in company securities and other related securities policies.

If you are unsure whether a particular activity or situation amounts to a violation of the securities laws, insider trading or personally benefiting from confidential information, consult with the Chief Compliance Officer before doing anything.

Computer Systems

Technology is a key tool in today's workplace and must be safeguarded against unauthorized access, theft, and/or misuse. Our clients, shareholders, and regulators expect DFIN to demonstrate a commitment to cybersecurity best practices.

Software and data must be protected from damage, alteration, theft, fraudulent manipulation, unauthorized access and disclosure of confidential company or client information. Each employee must follow measures to keep such information secure.

Account credentials should never be shared and appropriately strong passwords should be used. Computers should be locked anytime they are unattended or not in use.

DFIN systems, including workstations and email, are intended to be used primarily for business purposes. Incidental personal use is permissible if the use is lawful and ethical, does not consume more than a trivial amount of resources that could otherwise be used for business purposes, does not interfere with worker productivity and does not preempt any business activity. Messages may not contain offensive or defamatory content, such as comments or images that would offend someone on the basis of his or her race, sex, national origin, color, age, religion, genetic information, perceived or actual disability, perceived or actual sexual orientation, gender identity or expression, pregnancy or military status.

Employees should be mindful of the dangers associated with malicious software, phishing emails, ransomware, and other cyber threats. Compromised user credentials and infected systems are primary means by which our network and confidential data can be compromised.

Always be mindful to not open attachments or click on links contained within email messages unless you are confident of the legitimacy of the sender and message. Employees are expected to utilize the Global Protect VPN software anytime their computer is in use outside of a DFIN office location.

Non-standard software must be approved by IT and/or IT Governance prior to download and/or installation. All DFIN users must observe copyright restrictions for all software and associated documentation.

All materials stored, processed, sent or received on these systems are the company's property and are subject to inspection and monitoring by the company at any time and without prior notice. DFIN data and that of our clients must always be used only for the intended use as approved by the data's owner. Any misuse of systems or data could lead to separation from the company or other consequences.

For a more detailed summary of the company's policies in these areas, consult the company's Information Security Policy and other related policies on the DFIN IT Governance, Risk and Compliance intranet site.

Employees should immediately report any suspicious actions or activity on our systems or computer network to the IT Help Desk. If you are unsure whether a particular activity or situation amounts to a violation of the company's information systems and data policies, consult with IT Security or the Legal Department before doing anything.

Government Investigations and Information Requests

Prosecutors and government regulators have broad authority to investigate possible violations of law. They can convene grand juries, subpoena documents and seek interviews or testimony of company employees.

Company policy is to cooperate with every reasonable request of government investigators. At the same time, the company is entitled to all the safeguards provided by law for the benefit of persons under investigation or accused of wrongdoing, including legal representation.

If a representative of any government or government agency contacts you or requests access to data or documents for the purposes of an investigation, you must refer the representative to the Chief Legal Officer or other member of the Legal Department immediately. You must then immediately notify the Chief Legal Officer or other member of the Legal Department. You must also preserve all materials, including documents that might relate to the investigation.

Monitoring and Reporting of Violations

If you are aware of a violation of law or a company policy, including the policies set forth in these Principles of Ethical Business Conduct, you should report this information to your supervisor, manager, the Chief Compliance Officer or a member of the Legal Department. Alternatively, if you wish to remain anonymous, you may report your concerns using the company's toll-free "Ethics Hotline" or online at [add link].

When you call, be sure to provide enough information for the company to be able to follow up (for example, names of persons allegedly involved, dates and nature of activity). The company will investigate all reports of violations. You should not investigate on your own but leave such work to the appropriate people chosen by the company.

No employee should make a false report of a violation. No employee will be penalized for making a good-faith report, nor will the company tolerate retaliation against an employee who makes a good-faith report.

If you report a violation and in some way are also involved in the violation, the fact that you stepped forward will be considered.

While reports of violations should be addressed to your supervisor, management or the DFIN Ethics Hotline, questions regarding laws or the company's policies may be directed to the Chief Compliance Officer:

Leah Trzcinski

Chief Legal and Compliance Officer