

TABLE OF CONTENTS

INTRODUCTION	2
DOING THE RIGHT THING	3
COMMITMENT TO QUALITY	4
DIVERSITY AND INCLUSION STATEMENT	5
ANTI-HARASSMENT POLICY	6
EMPLOYEE RESOURCE GROUPS	7
GIFTS AND GRATUITIES	8
CONFLICT OF INTEREST	9
ADHERENCE TO CONTRACTUAL AND LEGAL REQUIREMENTS	10
ALCOHOL AND DRUG-FREE WORKPLACE	11



INTRODUCTION

At Bell and Howell, we pride ourselves in our commitment to building strong relationships with our customers, partners, suppliers, and vendors. These relationships are crucial to our success as a corporation, and we are dedicated to ensuring that these connections are held to the highest standards of ethical behavior.

These values that we hold extend across the organization as we provide services to many different customers all around the globe. These cornerstone values of integrity, transparency, honesty, and trust are expected of all Bell and Howell employees and ensure that we treat all stakeholders consistently and with respect.

Not only do we expect Bell and Howell employees to abide by our high standards, but we also place

this expectation on the companies and their employees that we do business with. We believe this has been a key factor in Bell and Howell's success and will continue to be so in the future.

By continually building upon and protecting the reputation of Bell and Howell, our strategic partners, and vast network of business connections, we safeguard ourselves against unethical behavior and increase our ability to not only better serve our customers but strengthen our relationships with them.

When we all work together towards this united vision, I know we will achieve great results.

Thank you,



Larry Blue President and CEO

KungaBlue



DOING THE RIGHT THING

Doing the Right Thing is our promise to each other as part of the Bell and Howell family. If we take care of each other, we take care of our customers, and take care of the company, we will be successful in our strategy and ensure Bell and Howell is a great place to work and have a career.

Specifics of Doing The Right Thing are as follows:



Equal Opportunity Employer

It is the Bell and Howell's standard to take action to achieve fair and equal treatment with respect to recruiting, hiring, training, transfers, promotions, compensation, benefits, or any other condition of employment. Our commitment to equal opportunity employment applies to all persons involved in our operations and prohibits unlawful discrimination by any employee, including supervisors and co-workers. We will not tolerate discrimination against any employee, vendor, or customer, without exception.

Our policy is to administer employment based solely on an individual's qualifications, ability and performance without regard to race, color, religion, gender identity, sex, sexual orientation, age, national origin or ancestry, physical or mental disability, genetic information, veteran status, uniformed servicemember status, marital status, or any other characteristic protected by federal, state or local law.

Teamwork

We believe Doing The Right Thing is an essential component of success.

Additionally, we believe success depends upon the quality of the relationships between Bell and Howell, our team members, our customers, our suppliers, our Business Partners, and our community. Customers' impression of Bell and Howell, and their interest and willingness to purchase from us, is greatly influenced by the people who serve them. The more goodwill you promote, the more our customers will respect and appreciate you, Bell and Howell, and our products and services.



COMMITMENT TO QUALITY

Bell and Howell is committed to providing the best value products and services to our customers though complying with requirements and through the attainment of quality goals and the continual improvement of our business processes. In order to produce these products and services, Bell and Howell maintains certain quality standards explained below.

International Organization for Standardization

Bell and Howell is dedicated to protecting and preserving the environment by minimizing the environmental impacts of our activities, products and services. To accomplish this, we will:



Educate, train, and motivate our associates to carry out their tasks in an environmentally responsible way.



Adhere to applicable legal requirements and other requirements which relate to our environmental aspects.



Reduce waste, prevent pollution, and minimize our consumption of natural resources.



Take initiative to embed environmental protection into our culture and strive to influence our customers and suppliers to do the same.



Have consideration for environmental issues in our business strategies.

Bell and Howell is committed to continual improvement of our environmental performance. This policy is communicated to all associates, contractors, suppliers, vendors, and customers and is available to all interested parties.





DIVERSITY AND INCLUSION STATEMENT

Bell and Howell is committed to an inclusive workforce that fully represents different races, ethnicities, genders, age groups, religions, disabilities, and sexual orientations, as well as people with differences in education, personality, skills, experiences, and worldviews. We work with a mindset of unity and inclusion as part of our promise of Doing the Right Thing. We want everyone we work with, from applicant to partner, to feel valued, included, and respected.

Larry Blue President and CEO





ANTI-HARASSMENT POLICY

Bell and Howell expects all entities to conduct themselves in a professional manner and to exercise good judgment. It is our intention to provide an environment free from harassment, intimidation, or insult for all people. As a result, we maintain a strict policy prohibiting sexual harassment and harassment against anyone based on any legally recognized status, including, but not limited to: race, color, religion, sex, pregnancy (including lactation, childbirth or related medical conditions), sexual orientation, gender identity, age, national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status or any other status protected by federal, state or local law. All such harassment is prohibited. This antiharassment policy applies to all persons involved in our operations, regardless of their position, and prohibits harassment by any Employee of Bell and Howell, including supervisors, managers, and nonsupervisory employees.

As part of our Doing the Right Thing promise, Bell and Howell employees demonstrate a clear understanding, respect, and appreciation for our anti-harassment policy. The topic is part of our annual essential training curriculum.

Training

For over 15 years, Bell and Howell has been recognized by Training magazine as one of the top training organization in the world. Training Top 100 is an annual list that ranks companies' excellence in employer-sponsored training and development programs. Our programs included blended learning, eLearning, instructor-led learning (ILT), and instructor virtual-led training (IVLT).

As part of our Doing the Right Thing promise, Bell and Howell employees demonstrate a clear understanding, respect, and appreciation for our all our policies. The topic is part of our annual essential training curriculum.

Bell and Howell is proud to offer a certification program for every piece of machinery that we service. Technicians undergo rigorous training in hands-on applications, and theoretical information before they are certified to take any calls unassisted. In 2020, we transitioned to a "Smart Hands" approach in which learners must be guided by a mentor virtually on a machine or be observed virtually by those certifying them till the procedure is accurately performed.

In some cases, this coupled with shadowing and mentoring on calls to attain final certification. This allows us to maintain our high standards of certification and work. In certain business critical cases, we continue to offer in-person learning at our training facility and will complete our hands-on certification protocols as we would normally.

Protection Against Retaliation

Retaliation in any form against an individual who reports a violation of our code of conduct or of law, even if the report is mistaken but made on a good faith basis, or who assists in the investigation of a reported violation, is itself a serious violation of Bell and Howell policy. Acts of retaliation should be reported immediately and will be disciplined appropriately.





Employee Resource Groups

As diversity and inclusion programs become more prevalent in the workplace, employee resource groups (ERGs) are gaining popularity.

Employee Resource Groups are volunteer employee-led groups that promote a diverse and inclusive workplace that is aligned with the organizations they serve.

They are typically led and involved by employees who share a common trait, be it gender, ethnicity, religious affiliation, lifestyle, or interests. Groups exist to provide support and help with personal or professional development and to create a safe space where employees can bring out their full personality. Allies can also be invited to join the ERG to support their peers.

Women and Black Americans in Leadership

Launched in 2021, Bell and Howell's first Employee Resource Group, Women and Black Americans (WBAL) in Leadership focuses on empowering often underrepresented groups both in the organization and the community. WBAL's mission is to cultivate an inclusive environment that supports and encourages women and black people to advance their skills and leadership potential through connection, mentorship, collaboration and discussion.

They host speakers, run community programs, network with mentorship programs, and more.

Contact Employee Services at Bell and Howell to learn more.





GIFTS AND GRATUITIES

It is Bell and Howell's policy to comply with all anti-bribery and anti-corruption laws. Bell and Howell prohibits any improper payment, promise of payment or offer of employment, or the improper provision of anything of value to government officials (including but not limited to any person employed by or representing government, officials of political parties, officials of public international organizations, candidates for office and employees of state-owned enterprises), or to any other person for the purpose of obtaining or retaining business or influencing official action.

Bell and Howell's premise of Doing the Right Thing touches every aspect of our actions and is reflected in our reputation for honesty, fairness and integrity. Our employees are prohibited from offering or giving any item of value to a current or prospective customer in an attempt to improperly influence a contract award decision or other favorable customer action. We expect our vendors to adhere to the same policy.

Meals and Entertainment

Bell and Howell employees are permitted to provide for entertainment and business meals for domestic and foreign commercial customers and suppliers, so long as such payments are reasonable, infrequent, business-related, do not violate the recipient's policies, and comply with applicable laws and regulations, and Bell and Howell's expense reporting requirements. We expect our vendors to adhere to these same principals when conducting business with Bell and Howell.



CONFLICT OF INTEREST

Bell and Howell holds every entity to the highest standards of integrity, honesty and fair dealing to prevent conflict. This policy prohibits actual conflicts of interest as well as situations creating the appearance of a conflict of interest.

You should never place yourself in a position where your actions or personal interests are, or appear to be, in conflict with the interests of Bell and Howell.

This occurs whenever you allow the possibility of direct or indirect personal gain to impair your judgment or actions or the appearance that direct or indirect personal gain may impair your judgment or actions in connection with your employment. Conflicts of interest include any undisclosed and unapproved activity or interest of an Employee not in the best interests of Bell and Howell.



ANTI-BRIBERY AND CORRUPTION

Many countries prohibit bribery of public officials. All Bell and Howell entities are subject to the antibribery laws of the countries in which Bell and Howell and its subsidiaries and affiliates operate as well as to the United States Foreign Corrupt Practices Act of 1977 ("FCPA"). The FCPA has extraterritorial effect beyond the United States and prohibits the bribery of foreign (non-U.S.) officials. The U.K. Bribery Act also has extraterritorial effect beyond the United Kingdom and forbids the bribery of anyone.

It is Bell and Howell's policy to comply with all anti-bribery and anti-corruption laws. Bell and Howell prohibits any improper payment, promise of payment or offer of employment, or the improper provision of anything of value to government officials (including but not limited to any person employed by or representing government, officials of political parties, officials of public international organizations, candidates for office and employees of state-owned enterprises), or to any other person for the purpose of obtaining or retaining business or influencing official action.

As part of our Doing the Right Thing promise, Bell and Howell employees demonstrate a clear understanding, respect, and appreciation for FCPA. The topic is part of our annual essential training curriculum.



ADHERENCE TO CONTRACTUAL AND LEGAL REQUIREMENTS

Bell and Howell is committed to delivering goods and services as promised within budget and on time, and in compliance with all applicable laws.



Ethical Labor

Bell and Howell requires ourselves, our suppliers and authorized subcontractors to comply with all applicable laws and regulations governing labor and employment, employee health and safety, ethical practices, and not use any type of involuntary or forced labor, including indentured, bonded, prison, slave or human trafficked labor.

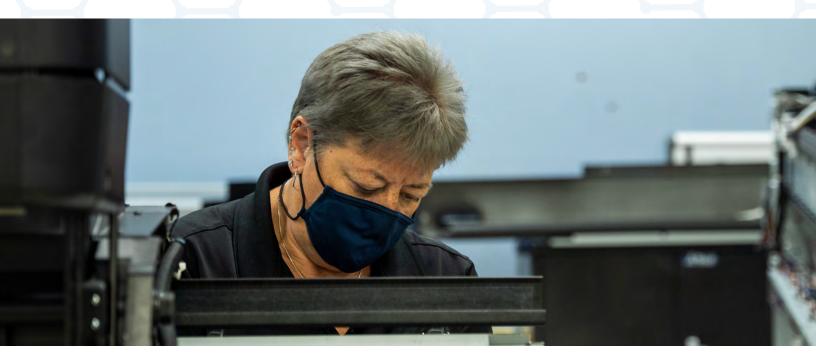
Environment

Bell and Howell requires ourselves, our suppliers, and authorized subcontractors to be compliant with all applicable environmental regulations, and we reiterate our commitment to provide products and/or services which are safe for our customers and the environment, which contain recycled materials where appropriate, and which do not contain conflict minerals.



ALCOHOL AND DRUG-FREE WORKPLACE

Bell and Howell strives to provide a safe environment for everyone and to minimize the risk of accidents and injuries. Accordingly, each person has a responsibility to co-workers and the public to deliver services in a safe and conscientious manner. Continuing research and practical experience have proven that even limited quantities of illegal drugs, abused prescription drugs or alcohol can impair reflexes and judgment. This impairment, even when not readily apparent, can have catastrophic consequences. Moreover, studies have shown that impairment by controlled substances may last long after the user believes the effects to have worn off. We adopted a policy that all employees, and vendors must report to work and remain completely free of illegal drugs, abused or non-prescribed prescription drugs, and alcohol.



Violence-Free Workplace

Bell and Howell is committed to providing a safe, violence-free workplace for everyone, and strictly prohibits employees, vendors, customers, visitors, or anyone else on Bell and Howell premises from behaving in a violent or threatening manner. It is our goal to have a workplace free from acts or threats of violence and to effectively respond in the event that such acts or threats of violence do occur.

Please know that any questionable behavior that could be construed as dangerous or violent, is unacceptable and will not be tolerated. Such behavior should be reported to a site supervisor, manager, Human Resources representative, or Security Officer and may result in either the removal of your employee, or termination of our business relationship.

Health and Welfare

The health and welfare of our employees, vendors, customers, visitors, or anyone else on Bell and Howell premises, being our primary concern as well as our ability to ensure compliance with applicable government and customer requirements, all Bell and Howell employees are required to be fully vaccinated against COVID-19 by January 1, 2022 or to the extent otherwise exempt from such mandatory vaccinations under applicable law, undergo weekly COVID-19 testing.





CONCLUSION

Bell and Howell anticipates successful business relationships with all the organizations it engages with. In order that our business relationship is not jeopardized, we ask that you abide by the guidelines set forth in this document. Any questions related to this document or doing business with our company can be directed to your contractual point of contact, or to any member of the Bell and Howell Legal Department.