

California Transparency In Supply Chains Act Disclosure

The California Transparency in Supply Chains Act of 2010 requires certain companies that manufacture or sell products in the State of California to disclose their efforts to eradicate human trafficking and slavery in their direct supply chains. Quad is committed to complying with the Act and our ethical standard is reflected in our Code of Conduct, "A Company with a Soul" ("Code"), which outlines our expectations of ethical conduct and compliance with all laws from our employees and others who work and represent Quad.

In addition to receiving our Code, employees take annual ethics and compliance training and certify their adherence with its standards. Quad also maintains an Ethics & Compliance Hotline where employees and contractors can submit any concerns of possible ethics and compliance violations, including slavery and human trafficking, anonymously if requested. Every submission is investigated and handled accordingly. Any employee or contractor who is found to have violated provisions in the Code is subject to disciplinary action, up to and including termination of employment or contracts and referral to appropriate legal authorities where applicable.

Quad management is not aware of any instances of human trafficking or slavery by any Quad employee or supplier, and Quad Supplier Code of Conduct prohibits all forms of forced or compulsory labor. At this time, Quad does not have a formal verification program to evaluate and address risks of human trafficking and slavery in its supply chain, nor does Quad conduct audits of suppliers for that purpose or require that suppliers certify that materials incorporated into its products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. Further, Quad does not provide training on human trafficking and slavery (or with respect to mitigating risks within its supply chain) to Quad employees and management who have direct responsibility for supply chain management.