

Pitney Bowes

BUSINESS PRACTICES GUIDELINES

Doing the Right Thing the Right Way



A Message from our Interim CEO

We do the right thing the right way.



Jason Dies
Interim CEO

Throughout our history, Pitney Bowes has always remained true to its core values. Those values compel us to do the right thing the right way: to treat our employees, customers, business partners, and communities with respect, fairness, honesty, trust, and integrity. It is a moral imperative and essential to our success as individuals and as a company that we treat people the way each of us wants to be treated. We hold ourselves and our colleagues to this high ethical standard. While much has changed at Pitney Bowes over the years and will continue to change, our pledge to provide an environment that encourages and demands ethical behavior is unwavering.

I truly believe that each of us, as Pitney Bowes employees, strives to do the best we can in our jobs every day. These Business Practices Guidelines help us do just that. They help us to live our shared values and put them into action daily. They provide a common set of principles and standards to guide our actions as we conduct our business.

Please review and be sure you understand these Guidelines. Refer to them frequently, and when you need help dealing with any ethics or compliance-related issue, do not be afraid to ask for help from any of the resources identified on the following pages.

We all have a role to play in ensuring that this core value is reflected in how we conduct business and in how we conduct ourselves. As interim CEO, I expect each of us to do the right thing the right way, no matter which business unit you work in or where in the world you live.

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Introduction

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1. About the Guidelines

Why do we have Business Practices Guidelines?

The Business Practices Guidelines (“Guidelines”) serve as our code of conduct. They guide us to do the right thing for the right reasons and in the right way.

These Guidelines also identify important policies and resources to find answers when you need them. They inform you who to contact to report your concerns or questions. The Guidelines cannot describe every law and policy that may apply to your expected conduct or business dealings, but they help to ensure that we are all going in the right direction.

Our Company can only live up to its ethical and legal commitments if each of us lives up to them daily. For that reason, each of us is responsible for speaking up if we believe that someone is doing something – or about to do something – that violates these Guidelines, the Company’s policies, or the law. That’s how we protect our most valuable asset – our reputation – that assures many more years of success.



1. About the Guidelines

Every Pitney Bowes employee has an obligation to:

- Read, understand, and comply with these Guidelines and take all required compliance training
- Know the laws that apply to our Company and our work
- Report any suspected violation of these Guidelines, Company policies, or the law consistent with local law
- Cooperate fully with any investigation the Company may undertake

Managers have a special responsibility and accountability under these Guidelines by:

- Demonstrating, by their words and actions, the importance of compliance and ethical behavior and that business performance is never more important than ethical conduct
- Ensuring the employees they supervise have adequate training, resources, and support to follow the Company's ethical standards and legal compliance requirements
- Avoiding words and actions that pressure employees to engage in unethical or illegal behavior; create an environment where employees feel safe to ask questions or report wrongdoing
- Monitoring compliance and report suspected or actual noncompliance – regardless of whether the manager has a reporting relationship with the involved employees

What other documents apply?

The Guidelines act as a primary reference guide regarding business practices and compliance requirements but is not the only resource that provides guidance. Be familiar with other guidance documents that apply to you, including employee handbooks, other standards of professional conduct that may apply to your function or profession, and employment contracts.



To whom do these Guidelines apply?

All of us, no matter what our position, are required to follow all applicable laws and live up to the high ethical standards outlined in the Guidelines. Also, we should engage or work with only those suppliers, consultants, or dealers whose actions are consistent with these Guidelines.

Which laws apply?

Pitney Bowes does business in many different countries. This means that we are subject to the laws of different jurisdictions as we do our work for the Company. Although these Guidelines were written to apply as broadly across the Company as possible, local laws and customs and local cultural differences may apply to our operations, depending on your business location. If you have questions about what laws apply to your business activities, be sure to obtain advice promptly from Legal.

Which policies apply?

All corporate policies apply to all subsidiaries, country organizations, and individual lines of business, except as stated in those policies. Also, each subsidiary or line of business may have adopted additional policies and procedures to further take into account local business practices and any more stringent local laws that apply to them. In all cases, we should always follow the strictest rules that apply, whether they are set out in laws, regulations, these Guidelines, or other Company policies and procedures. The corporate policies can be [found here](#).

1. About the Guidelines

ENFORCEMENT OF THE BUSINESS PRACTICES GUIDELINES

Non-Retaliation

Pitney Bowes will not tolerate any retaliation against an employee who, in good faith, seeks advice, raises a concern, or reports known or suspected misconduct. The Company will investigate and take claims of retaliation extremely seriously. Any individual (whether or not a manager) who engages in retaliatory conduct will be subject to disciplinary action, which may include dismissal. If you believe you have been subjected to retaliation for raising a legal or ethical issue in good faith, immediately contact Global Ethics, Human Resources, Legal, or the Ethics Helpline.

Disciplinary Procedures

Employees who fail to comply with these Guidelines, Company policy, or the law will face serious consequences, including possible final warnings, demotion, or dismissal. The matter may be reported to law enforcement if criminal activity is found. Managers and any employee who observes or knows about violating these Guidelines or the law and who fails to report it to management, Global Ethics, Human Resources, Legal, or the Ethics Helpline will also be subject to discipline.

Remember

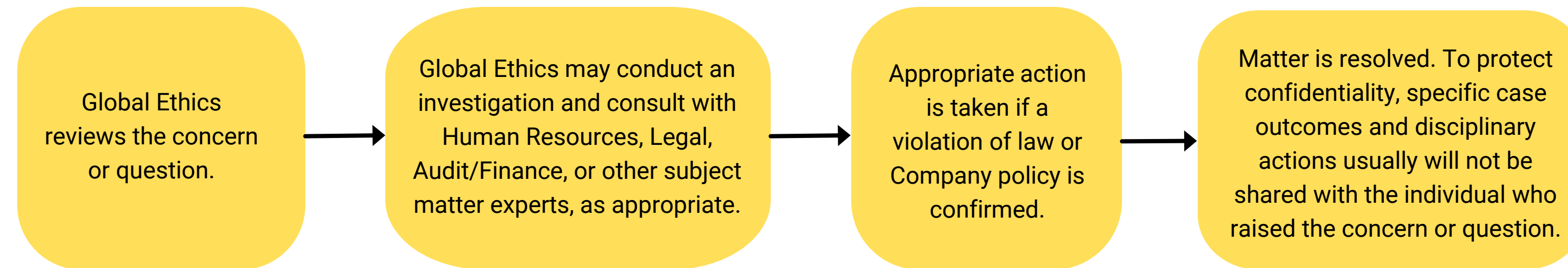


These Guidelines help protect you, your co-workers, and Pitney Bowes. Failure to read and understand these Guidelines, the Human Resource policies, or relevant policies is no excuse for a violation. Compliance with these Guidelines is not optional—no violation of Company policy or the law is worth damaging your reputation, Pitney Bowes reputation, or losing your employment.



2. Reporting a Concern

What happens when you report a concern to the Ethics Helpline?



3. Contacting the Global Ethics and Compliance Department

The Global Ethics and Compliance (Global Ethics) department oversees the Company's efforts to conduct business ethically and in compliance with the laws that govern us throughout the world.

Global Ethics:

- Provides Ethics and compliance training and communications
- Maintains corporate policies
- Sponsors the Ethics Helpline and other channels for employees to seek advice or report concerns about perceived or actual wrongdoing
- Investigates reports of policy or law violations

Employees may seek advice and report concerns through:

- Their manager
- The Ethics Helpline
- Human Resources
- Audit & Advisory Services
- The Global Legal and Compliance Organization

Acting ethically and in compliance with the law is every employee's responsibility.

[Click here](#) for some general guidance on how to make ethical decisions.



4. About the Ethics Helpline

What is the Ethics Helpline?

The Ethics Helpline is staffed by an independent third party to take in Pitney Bowes employee phone calls, emails, or web reports of concerns or questions about whether some activity meets the standards set by our policies and Business Practices Guidelines, the laws and regulations that apply to us, or our contractual commitments. The Ethics Helpline is available 24 hours a day, 7 days a week, in multiple languages.

When should I contact the Ethics Helpline?

If, for any reason, you are uncomfortable with talking to your manager, human resources representative, business unit lawyer, or Global Ethics, or if you've tried to get answers but have not been successful, you should contact the Ethics Helpline. Do not be afraid to ask whether an action meets Company standards or the law when in doubt. If something concerns you enough to ask a question about it, speak up. We are always here to help you.

Do I have to give my name when I contact the Ethics Helpline?

You do not have to identify yourself if permitted by law. Your report will be given a report number so you can follow up for an update, or we can contact you for more information. We will make every effort to protect your identity. Of course, if you've told others about your concern, the Company cannot be held accountable for maintaining anonymity. By providing your contact information, we can follow up with requests for critical information we may need to conduct an investigation.

Contact the Ethics Helpline:

Phone: (888) 407-3485 (US)

Email: EthicsOffice@pb.com

Can I talk to someone else other than the Ethics Helpline?

You can always approach your manager or business unit lawyer, Global Ethics, Human Resources, Audit, or any manager you think might be able to help you.

What types of issues can I report?

All violations of the law, Pitney Bowes policy or the Business Practices Guidelines, or any other internal code of conduct or standard should be reported, including but not limited to:

- Ethics and compliance issues, fraud, misconduct, corruption, financial issues, conflicts of interest, insider trading or antitrust regulations, colluding with competitors, bribery, theft, and embezzlement
- Employee relations issues, such as harassment, discrimination, or improper workplace conduct
- Loss or theft of data or assets belonging to the Company or clients (e.g., computers and cell phones)
- Workplace violence and alcohol or drug abuse
- Environmental, health and safety matters, such as occupational health and safety hazards



5. Ethical Decision-Making Guidelines

ASK YOURSELF:

- *Is it legal?*
- *Is it ethical?*
- *Is it consistent with Pitney Bowes values, our policies, and these Guidelines?*
- *Will it harm me or someone else?*
- *Is it something for which I am willing to be held accountable?*
- *Would it embarrass my co-workers, manager, the rest of the Company, our clients, or family?*



The Workplace

1. Respect, Diversity, and Inclusion
2. Human Rights
3. Health, Safety, and Security
4. Weapons and Workplace Violence
5. Drugs and Alcohol
6. Social Media

Doing the Right Thing in the Workplace

1. RESPECT, DIVERSITY, AND INCLUSION

Respect, diversity, and inclusion are critical Pitney Bowes values. The knowledge, dedication, and diversity of Pitney Bowes employees strengthen our competitive advantage. If you observe someone using words or actions you believe to be inconsistent with these guidelines, report it to your manager, Global Ethics, Human Resources, Legal, or the Ethics Helpline. Keep the workplace free from non-Company-approved solicitations (including charitable fund-raising activities), advertising, or literature of any kind related to your personal, spiritual, or political activities.

RESPECT

We treat each other and all we do business with courtesy, fairness, respect, and dignity. Whether in or outside the workplace, you should act responsibly, appropriately, and respectfully when conducting business or participating in Company-related activities, abide by local laws, and respect your fellow employees. Any suspected violation of human rights policies or laws must be reported and will be investigated.

What is a "Company-related activity"?

- Any activity on Company premises
- Departmental celebrations or holiday parties
- Dealings with clients or vendors
- Travel on Company business
- Attendance at any off-site work-related event, including training sessions, seminars, sales conferences, or business meetings



Doing the Right Thing in the Workplace

1. RESPECT, DIVERSITY, AND INCLUSION

DIVERSITY

Diversity and inclusion support our business objectives and the success of our Company. Applicants are hired, and employees are compensated, assigned, trained, promoted, and disciplined based on qualifications and performance. We never single someone out or treat someone differently based on their race, ethnicity, country of origin, nationality, sex, gender identity, sexual orientation, age, or based on any factor not related to someone's ability to do their job.



I believe I wasn't considered for a promotion because I have a physical disability. I have no restrictions on what I can do that would prevent me from carrying out the responsibilities of the new position. What should I do?

Explain your concerns to your manager and/or your Human Resources representative. Or, if you prefer, contact the Ethics Helpline for further investigation into your claim.



I believe I wasn't considered for a salary increase because I identify as non-binary and as a member of the LGBTQ+ community. My performance has met expectations, and I feel I've earned better consideration for an increase. What should I do?

Our policy states that we never single someone out or treat someone differently based on their gender identity, sexual orientation, or any factor not related to someone's ability to do their job. There are a number of ways to address your concern. You can start with your manager, Human Resources representative, or business unit leader. Or, if you prefer, contact the Ethics Helpline for further investigation into your claim.



One of my co-workers has made repeated references to my ethnicity. This includes mocking how I speak and calling me derogatory nicknames. I confronted my co-worker, who claimed she was only joking. The behavior has not stopped. What else can I do?

"I was only joking" is not an excuse for this type of behavior, which directly conflicts with the Company values and violates these Guidelines. Since you have already asked your co-worker to stop the behavior, your next step would be to consult your manager, your Human Resources representative, or the Ethics Helpline. An investigation will be conducted, and a resolution will be reached.



Doing the Right Thing in the Workplace

1. RESPECT, DIVERSITY, AND INCLUSION

INCLUSION (Harassment-free Environment)

Harassment, intimidation, and other unprofessional behavior disrespecting another employee's dignity are unacceptable. Forms of harassment include cyberbullying, sexual harassment, humiliating jokes, slurs, insults, or isolation related to a medical condition, to name a few. Causing discomfort or intimidation toward others is not permitted under our policy and laws and directly conflicts with our values.



When I'm traveling on business, does it really matter what I do in my free time?

If you engage in improper conduct while traveling on Company business, you could put the Company's reputation or business at risk. Keep in mind that when you are away from the office, you are still representing Pitney Bowes and should govern your behavior accordingly.



The project team I'm working on has had to work weekends lately. I can't work on Saturday for religious reasons, but I can come in on Sunday. I can tell my manager is annoyed and has made a few comments to me in front of the rest of the team. I want to continue working with the team, but I don't want to compromise my religious beliefs. What should I do?

You should not feel that you must compromise your religious beliefs in order to get your work done. If you feel comfortable, speak with your manager about how you feel and explain your situation. If you prefer, speak with Human Resources or the Ethics Helpline to voice your concerns. Appropriate actions will be taken to resolve the issue. An inclusive workplace is one in which everyone's beliefs are respected.



Doing the Right Thing in the Workplace

1. RESPECT, DIVERSITY, AND INCLUSION

What does harassment look like?

Any behavior that disrespects the dignity of another employee can be considered as harassment under applicable law.

For example:

- Bringing into the workplace materials which are likely to create hatred or fear
- Unwelcome sexual advances, requests for sexual favors, unsolicited physical contact, propositions, unwelcome flirtations, or offensive verbal or physical conduct of a sexual nature
- Intimidating or malicious abuse (physical, mental, or emotional) or ridicule
- Employees can be harassed by peers or subordinates as well as by managers
- Harassment can also occur between people of the same sex, sexuality, race, or ethnicity



My manager keeps asking me for a date. I don't even like her. What should I do?

Since such activity by managers may be viewed as sexual harassment, at Pitney Bowes, managers are not permitted to date any employee in their supervision line. Contact Human Resources or the Ethics Helpline to voice your concerns.



Doing the Right Thing in the Workplace

2. HUMAN RIGHTS

Human rights will be respected by Pitney Bowes employees, suppliers, representatives, and business partners. We will take all appropriate steps to avoid complicity in human rights violations that could arise through our business actions.

PROTECTING HUMAN RIGHTS IN OUR SUPPLY CHAIN

We will take all reasonable steps to ensure our suppliers, business partners, and representatives do not use forced, prison, child labor, or physical abuse or punishment of their workforce in producing or delivering our products or services.

FORCED OR CHILD LABOR

Pitney Bowes opposes the use of forced labor or the unlawful employment of children in any place where we do business. We will obey all laws relating to the terms and conditions of employment, especially child labor.

WAGE AND WORKING HOURS

We will comply with all applicable wage and hour laws and regulations, including those related to minimum wage, overtime hours, benefits mandated by law, and other compensation elements. Employees are required to accurately and timely report their actual time worked.



My manager wants me to not put in for all the overtime I'm working lately. He says it will negatively impact his budget and our site won't be eligible for a performance bonus. Is that right?

No. The Company is obligated to pay you for the time you worked. Managers must not ask employees to inaccurately record their time.



Doing the Right Thing in the Workplace

3. HEALTH, SAFETY, AND SECURITY

Health, Safety, and Security will always be given priority in how we get our work done. Every one of us is responsible for creating a workplace that is respectful, safe, fair, and honest. Pitney Bowes is committed to promoting a safe and productive work environment, and each employee's decisions and actions must support a safe and secure workplace.

We follow all safety rules and procedures while working. This includes when working at customer locations or driving on Company business. We report all accidents, illnesses, or violations of safety or environmental policy occurring in the workplace or while conducting client Company business without delay so that they may be investigated.

As employees, we must make safety a core principle in everything we do. It is everyone's responsibility to participate in safety training. We immediately report any spill, hazardous condition, or workplace accident to management, our local Health and Safety Committee, building maintenance personnel, the Environmental Health and Safety department, or the Ethics Helpline. All employees should understand what to do, who to call, and where to go in the event of an emergency in the workplace. Pitney Bowes emergency preparedness and Business Continuity information [can be found here](#).



A safety device on my machine is broken. Should I say something?

Yes. All safety equipment has been installed to protect your safety. You should let your supervisor, manager, technician, or safety representative know that the safety equipment is not working properly.



Doing the Right Thing in the Workplace

4. WEAPONS AND WORKPLACE VIOLENCE

Weapons, dangerous materials (such as firearms, explosives, or ammunition), and cutting instruments (such as knives) are not permitted while conducting Company business or while on Company property (subject to local law). All threats or acts of violence to employees or the workplace are taken seriously and will be assessed and addressed without delay. We emphasize early intervention and timely notification when employees notice some of the warning signs of potential workplace violence. To learn more about how the Prevention of Critical Incidents Team responds to threats or acts of violence, [click here](#).



I usually carry a rifle in my truck because I like to go hunting after work and on the weekends. Is it okay if I drive that truck with the gun in it while I make my sales calls?

No. You may not carry a weapon in any vehicle you use while conducting Company business or park on Company provided premises (subject to local law).



I have an abusive spouse and I don't know what I should do.

Because domestic violence may lead to workplace violence, the reluctance of a victim to come forward due to fear or shame may unintentionally expose the workplace to violence. If you or someone you know at work may be a victim of violence, you are encouraged to tell your manager, Global Ethics, Human Resources, Legal, or the Ethics Helpline. Resources for guidance and support are available. All matters will be handled with discretion.



I have a concern about a co-worker who has recently started discussing firearms and some recent high profile workplace violence incidents. Should I report these changes?

Yes. Whenever you have a question or concern, it should be raised with your manager, Global Ethics, Human Resources, Legal, or the Ethics Helpline. These groups have experience to investigate any potential concerns and will be aware if similar concerns or questions have been raised by others.



Doing the Right Thing in the Workplace

5. DRUGS AND ALCOHOL

DRUGS

While on Company premises (including car parks and parking lots) or while conducting Company business, employees must not use, sell, purchase, manufacture, have, or distribute (i) controlled substances when held or used in an abusive or illegal manner or (ii) illegal drugs.



I sometimes see other employees using illegal drugs during their work breaks. Should I report it?

You are strongly encouraged to report the matter to your manager or Human Resources representative. The possession or use of illegal drugs on Company premises or Company time is strictly forbidden.

ALCOHOL

Employees may not report to work or engage in Company business, whether or not on Company premises if their performance is impaired by alcohol or drug use. Alcohol may be served or consumed in the workplace only as allowed by local facility policy and law. Employees must drink responsibly and act professionally (on or off Company premises) during any social or business event connected with Pitney Bowes.



My manager holds some staff meetings late in the afternoon at a local bar and buys snacks and alcohol for everyone. I don't drink alcohol and feel pressured to at least order a drink. I'm unsure about what to do.

It's improper for anyone to pressure you into ordering alcohol when you don't want it. You should tell your Human Resources representative how this activity affects you. Further, each business unit has guidelines about when alcohol can be served at work-related functions, especially if the Company will be paying for it.



Doing the Right Thing in the Workplace

6. SOCIAL MEDIA

When using Social Media, it is legally required and policy-driven that you do not represent that you speak for, or that your opinions or views are those of, Pitney Bowes unless you are authorized to do so. In addition, if you are commenting on Pitney Bowes products or services, you must identify yourself as a Pitney Bowes employee. It is never permissible under any circumstances to share non-public information. Follow Pitney Bowes [Social Media Use Guidelines](#).



Is it okay to praise Pitney Bowes new product offering without identifying myself as an employee?

No. Always Identify yourself as an employee when discussing Pitney Bowes, and be clear that you represent your views, not those of the Company.

Using social media safely and responsibly helps protect you from any potential disciplinary actions or legal consequences. Keep these tips in mind when using social media.

BE TRANSPARENT. If you are worried you might get in trouble about what you post, it is probably better that you not post it.

BE JUDICIOUS. Avoid posting any confidential company information or sharing information about your colleagues.

BE KNOWLEDGEABLE. Review your post for accuracy. If you borrow content from somewhere else, cite your sources.

BE CONVERSATIONAL. Write in your own voice. Share your personality in a respectful way.

BE RESPONSIBLE. When using social media, you alone are responsible for what you post.

BE CONSIDERATE. Respect yourself and your peers. No slurs, personal attacks, obscenity, or inflammatory topics.

BE THOUGHTFUL. It is easy for posts to be taken out of context. Anticipate reactions to your post before sharing it.

BE PROFESSIONAL. Keep the details of your personal life out of any social media posts you make for Pitney Bowes.

BE LEGAL. Comply with all applicable laws (e.g., copyright, privacy, defamation, etc.).

BE SAFE. Cybercriminals are watching, so be careful what you share and to who you send it.



The Marketplace

1. Fraud, Dishonesty, and Reciprocity
2. Anti-Corruption / Anti-Bribery
3. Antitrust / Fair Competition
4. Anti-Boycott / Sanctions
5. Trade Controls
6. Business Partners and Suppliers
7. Product/Service Quality and New Markets
8. Government Contracts

Doing the Right Thing in the Marketplace

1. FRAUD, DISHONESTY, AND RECIPROCITY

Pitney Bowes is committed to doing business fairly, honestly, and legally with our customers, business associates, suppliers, and competitors. We compete vigorously but always with integrity and in compliance with applicable laws that promote competition in the marketplace. It is generally not acceptable to participate in any activity that would support unfair competition.

FRAUD, DISHONEST, AND DISPARAGEMENT

We will be honest at all times. We never knowingly make false statements, provide inaccurate documentation or report information in bad faith. Our products and services will be marketed using fair and lawful business methods and will not make misleading or disparaging statements about a competitor's products or services.

RECIPROCITY

Our decisions to obtain products and services are based on price, quality, and suitability. In turn, we expect our current and prospective clients to purchase Pitney Bowes products and services on the same basis, free from any promise of an exchange of business or personal benefits.



Doing the Right Thing in the Marketplace

2. ANTI-CORRUPTION / ANTI-BRIBERY

We do not accept or give bribes or kickbacks in any business relationship for any reason. All Company transactions must comply with reporting, recording, and foreign exchange rules.

PROCEEDS OF CRIME

Pitney Bowes will not knowingly do business with clients who pay us with money from criminal activities or participate in schemes to conceal the criminal origin of a client's funds ("money laundering"). If you suspect any client payment is connected with criminal activity or that clients are participating in a scheme to pay us with funds to 'clean' their money, report it to Legal or Audit.



What is the U.S. Foreign Corrupt Practices Act? Do I need to be concerned about it if I work outside of the U.S.?

Yes. The Foreign Corrupt Practices Act is a U.S law that prohibits offering or giving, either directly or through a third party, anything of value to representatives of a foreign government, political party, party official, or candidate for office, or their families, to influence decisions or obtain favorable treatment. The Act also prohibits ignoring internal accounting controls and falsifying books and records, including accounting records and financial statements, to disguise payments to foreign officials. If your job involves trade or travels overseas, you should be familiar with this law. Contact your business unit lawyer or Audit for more information.



Doing the Right Thing in the Marketplace

2. ANTI-CORRUPTION / ANTI-BRIBERY

BRIBERY

We must never try to improperly influence someone with bribes or kickbacks (money, gifts, meals, gratuities, or entertainment) or reward them for treating Pitney Bowes favorably in any government or commercial business relationship.

What does bribery look like?

- A potential government client requires you to pay a certain company as a 'sales agent' to close a deal with the client.
- For a 'fee,' a businessperson offers to help reinstate client progress payments that were stopped for no good reason.
- A customs agent demands a 'special' fee to arrange clearance of a product shipment.
- A dealer offers expensive gifts to a contract manager to win a contract bid.
- A government client asks you to pay travel expenses for a visit to your product showroom in another country, and he wants to bring his family and visit attractions along the way as well.



Can Pitney Bowes accept payment from an individual government employee?

Payments made in connection with Pitney Bowes business to or by a government entity must be lawful, made directly to or by that entity, and paid by check, wire transfer, or other recordable means. Such payments must not be made by or to individual government employees or their families or to any other individual.



Doing the Right Thing in the Marketplace

3. ANTITRUST, FAIR COMPETITION, AND COMPETITORS

We never have discussions or make arrangements with competitors regarding pricing, credit terms, bids or offers, or any similar matters. It is never acceptable to use deception, theft, or unfair methods to obtain competitive confidential information.

VIGOROUS AND FAIR COMPETITION

Learn about, understand, and obey the legal requirements for fair competition in the country in which you work. Violations of competition laws, whether deliberate or unintentional, can expose both Pitney Bowes and you and penalties.

FIXING PRICES AND OTHER TERMS

You must never agree to set prices, divide territories, or customers with a competitor.



A competitor has been making false and misleading statements about Pitney Bowes products and services. Should I respond?

Don't respond on your own initiative. Report the situation to your business unit management, who will then consult with Legal as appropriate.



Doing the Right Thing in the Marketplace

3. ANTITRUST, FAIR COMPETITION, AND COMPETITORS

COMPETITIVE INTELLIGENCE

We may gather competitive intelligence through legitimate means, but we do not ask for or use information that we should not have. Employees cannot use in any way or disclose confidential information obtained from their former employer. If you get, or someone gives you, information that you know or suspect is confidential and belongs to a supplier or competitor, please tell your manager, Global Ethics, Human Resources, Legal, or the Ethics Helpline.

INDUSTRY ORGANIZATIONS AND COMPETITORS

We may participate in standards organizations with competitors, provided there is no discussion of prices, sales terms, market divisions, or the like. Consult with Legal for guidance prior to attending any industry-wide meetings.



I met a competitor at a trade show who suggested that we could both sell more efficiently if we divide up the sales territory. What should I do?

Say no! Tell the competitor that this agreement is against Pitney Bowes policy and may be a violation of the law. Report the conversation to your business unit management who will report this situation to Legal.



We just received a request for a proposal for a large contract. I think we will improve our chances of winning if we team with a company that has been a competitor in other situations. Can I do this?

It will depend on the particular circumstances. Legal can help you assess and minimize the risks and design the most beneficial arrangement for Pitney Bowes. Before you approach the competitor, have the Legal Department and business unit management evaluate the proposed relationship.



Doing the Right Thing in the Marketplace

4. ANTI-BOYCOTT / SANCTIONS

We must never agree to boycott potential or actual clients or suppliers or otherwise engage in or support restrictive international trade practices not allowed by the governments of the countries in which we do business. Entering into, or being asked to enter into, agreements to restrict trade or otherwise assist a boycott could be construed as participating in a boycott. The Company is required to report boycott requests, and employees must inform Global Ethics, Legal, or the Ethics Helpline of any such request.



I am processing an order for an international client. Is there anything I should be aware of?

You need to understand export and import control and trade laws that apply to the product being shipped and the client's location. You should be particularly concerned if the order contains any technical data or information, or parts that could be used for purposes other than its normal use. Contact Legal for more information.



What is an export?

An export can be a shipment of a product, but it can also be a disclosure, transfer (oral, written, electronic, or visual) of information, data or software source code.



Doing the Right Thing in the Marketplace

5. TRADE CONTROLS

We will comply with all applicable laws and treaties of the countries in which we import or export products, technology, or software. This includes all applicable customs requirements (e.g., duty and other tax payments, standards control, and documentation requirements) of the importing country. We do not do business with anyone identified by the government as a prohibited party.



Are Trade Control / Anti Boycott / Sanctions laws the same in every country?

No. Contradictions exist between U.S. laws and the laws of other countries regarding boycott and anti-boycott policies. Employees must have such potential conflicts reviewed on a case-by-case basis by Legal. Don't make assumptions based on appearances or things that you have heard.



Doing the Right Thing in the Marketplace

6. BUSINESS PARTNERS AND SUPPLIERS

Business partners and suppliers enable us to be successful. Pitney Bowes is committed to doing business fairly, honestly, and legally with our business partners, including our suppliers, dealers, consultants and others with whom we do business. Pitney Bowes also expects its business partners to operate with comparable standards of ethical behavior and legal compliance.

RETAINING ETHICAL BUSINESS PARTNERS

We follow all required Company procedures and policies for engaging business partners and managing our relationships with them. We conduct appropriate due diligence before doing business with any company to ensure that the prospective business partner is competent, qualified, law-abiding, and agrees to comply with Pitney Bowes policies.

DEALING FAIRLY WITH SUPPLIERS

Pitney Bowes is committed to fair dealing with its suppliers in accordance with the contracts agreed upon and with all applicable laws. Pitney Bowes procurement decisions should be based on sound business reasons such as price, quality, and suitability.

BUSINESS PARTNER CONDUCT

We expect our business partners to conduct business in accordance with all legal requirements and always with integrity. We cannot at any time engage in unethical or illegal conduct to secure or maintain business relationships with our business partners, including accepting bribes or kickbacks in exchange for doing business with them.



Doing the Right Thing in the Marketplace

7. PRODUCT/SERVICE QUALITY AND NEW MARKETS

Conducting business in line with international, financial, and governmental regulations can be challenging. Failure to respond appropriately to competitive pressure or failure to understand acceptable practices may result in civil or criminal trouble. To minimize risk, have a clear understanding of what is and is not acceptable in practice wherever we do business and consult your resources if the next steps are unclear.

PRODUCT / SERVICE QUALITY

We represent our products and services fairly and accurately to current or prospective clients. We should always help our clients understand the terms of our sales and services and deliver what we agreed to deliver. Never endorse, sign, or alter documents for a client.

DOING BUSINESS IN NEW MARKETS

Consult with business unit management and Legal prior to conducting business in a country where Pitney Bowes is not currently doing business, before changing the current method or form of business, or before adding a new type of business.



Doing the Right Thing in the Marketplace

8. GOVERNMENT CONTRACTS

All representations to governments (including any invoices) must be accurate. Whether written or oral, false statements and claims may subject you and the Company to potential civil and or criminal penalties, as well as deny eligibility for future contracts. Always avoid any activities that are, or may be viewed as improperly influencing, the objective decision-making of a government client. When in doubt about engaging in a possible particular action, please seek guidance from Global Ethics or the Legal department.

Government contracts may be subject to special laws and rules that apply to them. Familiarize yourself with policies and local laws to ensure that they are followed.



Who is a "government employee"?

A government employee can include anyone employed by the government, candidates for office, families of government employees, or employees (and their families) of international organizations like the United Nations.



Finance and Assets

1. Fair and Accurate Records Information
2. Records Management
3. Company Property and Resources
4. Privacy and Data Security
5. Conflicts of Interest

Doing the Right Thing with Our Finance and Assets

Pitney Bowes will be honest and complete in measuring the Company's financial performance and will maintain a system of financial controls. Always create, use, maintain, or destroy Company records as directed by our Company-wide Master Records Retention Policy and Schedules.

1. FAIR AND ACCURATE INFORMATION

FAIR AND ACCURATE RECORDS AND INFORMATION

All business transactions should be properly authorized and accurately recorded in the Company's records, in compliance with Pitney Bowes financial policies and generally accepted accounting principles. No unrecorded funds or other assets will be established or maintained for any purpose.

What does accurate financial accounting look like?

- All books of account, budget proposals, financial forecasts and plans, economic evaluations for projects, and the like must truly reflect the transactions they record or assumptions made based on the best information available. In every situation, accounting must conform to ethical business practices.
- No false or deceptive entries shall be made, and all entries must contain appropriate and accurate descriptions of the underlying transactions.



Doing the Right Thing with Our Finance and Assets

2. RECORDS MANAGEMENT

The Enterprise-wide Master Records Retention Schedule identifies record types and their established retention periods. Records may be destroyed at the end of the applicable retention period. However, you must keep all Company records relevant to any actual, pending, or threatened litigation or government investigation, regardless of general document retention periods. You are responsible for knowing and following the records retention policies of your business unit and department.

What is a "record"?

A record is any information the Company must retain for specified periods to satisfy legal, operational, fiscal, or contractual requirements. A record can be information or communication in any medium (whether paper or digitally produced) or other relevant material in any form including email messages, timecards, computer data, or electronic versions of documents.



Doing the Right Thing with Our Finance and Assets

3. COMPANY PROPERTY AND RESOURCES

We use Company funds, work time, equipment, supplies, documents, electronic networks, intellectual property, mail, data, and other tangible or intangible resources responsibly, appropriately, and in the service of Pitney Bowes business. We properly maintain Company assets and safeguard them from theft and return all assets when employment ends.

We cooperate fully with the Company's efforts to patent, register or otherwise protect its intellectual property (copyrights, patents, trademarks, and trade secrets) and don't act in conflict with the Company's ownership interests. We ensure that the Company does not infringe on the intellectual property of other companies.

Limited personal use of Company-provided technology (e.g., copiers, printers, telephones, computers) is permitted as long as your use is limited in duration, does not interfere with your job responsibilities, and complies with Company policies and these Guidelines.

To the extent permitted by law, employees should have no expectation of privacy in their personal use of Company-provided internet, email, voicemail, or other Company resources.

We never use Company assets to harass others, access pornography, gamble, commit unlawful acts, or for activity or behavior which is offensive, inappropriate, or conflicts with the Company's interests.



Doing the Right Thing with Our Finance and Assets

3. COMPANY PROPERTY AND RESOURCES



Is it acceptable for me to use my office computer during lunch times for work-related outside courses?

Since the courses are work-related, it may be acceptable to use the Company computer during your lunch period. However, you should still speak with your manager about it. Please keep in mind that Pitney Bowes reserves the right to access, search, read, copy, or otherwise use data and information stored on Company computers without the consent of the creator or recipient.



I operate a small home-based business that works with adults who have learning disabilities. May I use the Company's email system to notify PB employees in the building about my services?

No. Personal use of Company resources must be minimal and not for personal business gain. In this case, emailing other employees to advertise your company serves only your personal business interests and is against Company policy.



When I ordered equipment recently, my supervisor told me to charge it against another expense category. He explained that our equipment budget couldn't handle the expense and that it has no effect on the total budget. What should I have done?

You should not knowingly make an incorrect entry in the books and records of the Company. Explain this to your supervisor. If your supervisor persists, contact Human Resources, Legal, Global Ethics, or Audit.



Doing the Right Thing with Our Finance and Assets

4. PRIVACY AND DATA SECURITY

CONFIDENTIAL INFORMATION

Confidential information is all Pitney Bowes information that, if compromised, could result in some financial loss, legal action, or damage to Pitney Bowes. We are responsible for protecting confidential information from anyone (even a Pitney Bowes employee) who does not have a need to know such information to perform their job. Confidential information can relate to employment, finances, clients, postal data, and third parties. For example: sales and marketing plans, salary and wage data, client information, databases, and lists, information about our dealers or suppliers, and new product plans or development.



I went into a conference room where a management meeting had just ended and found some strategy documents labeled "Pitney Bowes Confidential." What should I do?

Give the documents to your manager. If your manager is unavailable, call Legal. Do not leave the documents in the room or discard them.



My co-worker travels frequently, so she's asked me to check her email with her password. I have her permission, so there's nothing wrong with that, right?

No. Your co-worker should not have shared her password with you. Passwords should be closely guarded secrets.



Doing the Right Thing with Our Finance and Assets

4. PRIVACY AND DATA SECURITY

PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information, sometimes referred to as “PII” (in the US) or “personal data” (in Europe and Canada), is any information relating to a specific person and, in some places, a specific company or organization.

Personal information includes any information that:

- Can be used to identify a person or entity, directly or indirectly, such as a name, address, phone number, fax number, email address, financial profile, social security number (SSN), Social Insurance Number (SIN), or credit card information
- Is associated with a person’s physical, mental, economic, financial, cultural, or social identity (e.g., age, gender, marital status, personal or family income)



I often work with personally identifiable information and sometimes need to share it with vendors or individuals who are not Pitney Bowes employees. How do I do that?

You can share some personally identifiable information under certain conditions. [Click here](#) to read our data policies and find out which data protection officer is assigned to your country.



Doing the Right Thing with Our Finance and Assets

4. PRIVACY AND DATA SECURITY

All employees must respect and protect the privacy of our Company, our clients, distributors, business associates, suppliers, and coworkers' confidential information.

All employees who handle personal information or confidential information, including those relating to the Company's current, past, and prospective employees, clients, business partners, suppliers, or agents, must ensure the privacy of such information in accordance with applicable contract terms, local policy, and local laws. All employees must understand and follow Pitney Bowes global privacy policies found [here](#).

We may be required by law or contract to protect our clients' confidential information in the same way we protect our confidential information. Check with Legal if you have questions.

Many countries have strict data privacy and protection requirements restricting, among other things, sending personal data from one country to another. To comply with these laws, you should consult with Legal or the Global Privacy Office.



I received confidential information in the mail about a competitor's business plan. I didn't ask for it, but now that I have it, what should I do?

Contact Legal for instruction. Do not read or make copies of the material.



Doing the Right Thing with Our Finance and Assets

5. CONFLICTS OF INTEREST

We must always act in the best interests of Pitney Bowes and avoid conflicts of interest or even the appearance of a conflict. A conflict of interest occurs when personal interests interfere or could interfere with the ability to remain objective when conducting Company business. We never let our personal interests influence our dealings with our clients, suppliers, or business partners.

Conflicts of Interest areas include:

SPECIAL SITUATIONS

- Procurement Activity
- Special Services and Discounts
- Government Customers
- Honoraria

PERSONAL INTERESTS

- Personal Relationships
- Dealing with Pitney Bowes
- Dealing with clients, suppliers, and business partners
- Outside employment and activities
- Corporate opportunities

INSIDER TRADING

GIFTS, MEALS, AND ENTERTAINMENT



Doing the Right Thing with Our Finance and Assets

5. CONFLICTS OF INTEREST – SPECIAL SITUATIONS

PROCUREMENT ACTIVITY

We cannot accept gifts, gratuities, meals, or entertainment of any kind from any supplier or prospective supplier during a bidding process for goods or services.

SPECIAL SERVICES AND DISCOUNTS

We cannot accept special services or discounts of any kind from suppliers, business associates, or clients unless these services and discounts are made available to all Pitney Bowes employees in the applicable department or business unit.

GOVERNMENT CUSTOMERS

We cannot give or accept entertainment, meals, or other items of value to or from any government employee. This is a matter that is strictly regulated by law and Pitney Bowes internal policies.

HONORARIA

You may not accept financial compensation or gifts (other than within Pitney Bowes gift guidelines) for a speech or service given by you in your capacity as a Pitney Bowes employee. In addition, ensure you have the prior approval of Corporate Communications and your manager prior to accepting any invitation to deliver a speech or service in order to prevent any conflict with these Guidelines or Company policies.



Doing the Right Thing with Our Finance and Assets

5. CONFLICTS OF INTEREST – PERSONAL INTERESTS

PERSONAL RELATIONSHIPS

Pitney Bowes respects the right to privacy and choice in each employee's private life. However, personal interests must not conflict with business responsibilities. For that reason, subject to local law, employees may not be managed, directly or indirectly, by anyone with whom they have a personal relationship and must promptly tell management and Human Resources about that relationship.

A personal relationship includes relationships between those who are closely related by blood or marriage, domestic partners, very close friends, and those who are romantically involved. If you are responsible for independently verifying or recording the actions of another employee, you cannot have a personal relationship with that employee. For example, a family member cannot hold a Pitney Bowes position that approves supplier payments if another family member is an employee who pays those suppliers or accounts for the payments made.



My sister has a software programming firm. Can her firm bid on Pitney Bowes work?

Your sister's firm may bid on contracts with Pitney Bowes in accordance with procurement policies. As a relative, you must avoid the appearance of a conflict of interest by not being involved in either the vendor choice or the daily supervision of the vendor. You must disclose this potential conflict if you would otherwise be involved with reviewing bids for this work and may not participate in the review process.



Doing the Right Thing with Our Finance and Assets

5. CONFLICTS OF INTEREST – PERSONAL INTERESTS

DEALING WITH PITNEY BOWES

Employees may not (i) enter into business relationships as business associates or suppliers to Pitney Bowes, (ii) be employed by a dealer or competitor of Pitney Bowes, or (iii) work for a client or supplier with whom the employee has a relationship as part of their job with Pitney Bowes. You may own stock in any publicly traded company that does not directly compete with Pitney Bowes.



I got a call from one of our business partners' client survey department asking me to participate in a client relations survey. In return, the client will send me a check for \$100. Is it okay to participate in the survey?

No. Employees may not accept any cash, securities, or anything convertible to cash. The \$100 check is considered cash, so you could not accept it.



A supplier I regularly deal with has offered me a substantial discount on supplies that my daughter's school uses and would like to purchase. Can I accept his offer?

You cannot accept this offer. Acceptance of an offer like this can appear to influence your future decisions.



Doing the Right Thing with Our Finance and Assets

5. CONFLICTS OF INTEREST – PERSONAL INTERESTS

DEALING WITH CLIENTS, SUPPLIERS, AND BUSINESS PARTNERS

Employees may not conduct business with any client, business partner, or supplier if the employee, or anyone with whom they have a personal relationship, has a business interest in that client, business partner, or supplier without prior written approval from Global Ethics.

A personal relationship does not necessarily disqualify a company from becoming a Pitney Bowes supplier or business partner, but no Pitney Bowes employee may financially benefit from that relationship. In addition, the employee with the personal relationship may not be involved in the decision to do business with that company and may not manage or influence the hired company's work or compensation.



My team was involved in executing a special marketing program for a new client. As a small token of appreciation, the client sent us coffee mugs and baseball caps that carry the client's company logo. Is it okay to keep the mugs and baseball caps?

Yes, with your manager's approval. These types of gifts are acceptable as long as they are given infrequently and there is a valid business reason for the gift. Baseball caps and mugs labeled with the client's company logo usually would be considered nominal value.



Doing the Right Thing with Our Finance and Assets

5. CONFLICTS OF INTEREST – PERSONAL INTERESTS

OUTSIDE EMPLOYMENT AND ACTIVITIES

If you are looking for or have a second job outside of Pitney Bowes or are self-employed while you are a Pitney Bowes employee, you must tell your manager or Human Resources. Serving on a board of directors or as a consultant to another company or organization also may pose a conflict of interest.

Remember, if you have another job, you must continue to meet the performance standards (including overtime requirements, if any) of your Pitney Bowes job and may not perform any functions of your other job when you are supposed to be doing Pitney Bowes work or while on Pitney Bowes property.



I'm a sales rep and have an aunt who is the Commissioner of Education in my state. Is that important? The Department of Education is not in my assigned sales territory.

You should disclose that relationship to your manager, Global Ethics, and Global Government and Regulatory Affairs. Pitney Bowes may be required to disclose that relationship.



I want to invest in a private company that is developing a product for Pitney Bowes. Is this a conflict of interest?

There may be a conflict, depending on your position at Pitney Bowes, your influence on purchasing decisions, and the amount of your investment. Ask before you invest.



I am considering starting my own business. I'm pretty sure it won't conflict with Pitney Bowes or my job. Is it okay to do?

You should consult with your Manager, Human Resources, or Global Ethics before proceeding to discuss the opportunity and determine whether the opportunity would conflict with Pitney Bowes business or your current position.



Doing the Right Thing with Our Finance and Assets

5. CONFLICTS OF INTEREST – PERSONAL INTERESTS

CORPORATE OPPORTUNITIES

Employees of Pitney Bowes share a stake in the ongoing success of the Company and are expected to always protect and support the Company's interests.

Pitney Bowes employees may not take for themselves or give to anyone else any business opportunity that fits within Pitney Bowes business profile, unless they have written permission from management or Global Ethics.



I want to serve on a board of directors for a start-up company in the online retail space. Do I have to clear that with anyone?

Because Pitney Bowes has certain operations actively involved with online retail, you should discuss your idea with your manager and Global Ethics before accepting any offer to serve on the board. In deciding whether you can pursue a board seat with this start-up, Global Ethics, Legal, and your manager will consider whether your board service could compromise your responsibilities and duty of loyalty to Pitney Bowes.



Doing the Right Thing with Our Finance and Assets

5. CONFLICTS OF INTEREST – INSIDER TRADING

We cannot buy or sell securities based on material non-public information or give such information to others. Buying or selling stocks, bonds, or other securities based on material, inside information, or influencing others to do so is illegal and may result in significant civil and criminal penalties.

What is "inside information"?

"Inside information" is information that is not known to the general public. Information is considered "public" one full trading day after the Company has announced the information through news wire services, an annual report or prospectus, public filings, radio, or TV.

What is "material information"?

"Material information" is information important enough to influence a reasonable investor's decision whether to buy, sell, or hold a security. Pitney Bowes policy and the law forbids employees from using Pitney Bowes material inside information to trade stocks, bonds, or other securities or to help others to do so.

What about information belonging to clients, business partners, or suppliers?

Pitney Bowes employees may never use inside information we have about or from clients, business associates, or suppliers to trade in their securities or Pitney Bowes securities or to help others do so.



Doing the Right Thing with Our Finance and Assets

5. CONFLICTS OF INTEREST – INSIDER TRADING



As a Finance employee, I have access to quarterly earnings information before it is released. A close friend who is an employee was curious about the numbers. She knows I can't say anything directly, but if she asks me for hints about profits, can I give her a rough idea?

No. It is wrong to ask for or divulge such information before it is publicly released, even to other Pitney Bowes employees. This includes general statements, hints, or confirmation of a guess.



I heard that Pitney Bowes is about to acquire another company. The acquisition will probably increase stock value. Can I mention this information to my wife and my son?

No. Such disclosure is against Company policy on disclosing confidential information. Additionally, if you, your wife, or your son trade Pitney Bowes stock or the stock of the acquired company based on that information, and that information is material, you could be violating insider trading laws.



I found out by accident that a client company is about to release a brilliant new product which will most likely cause their stock price to soar. I'd love to get in on it! Since it is not Pitney Bowes "inside information," is it okay for me to invest in some of their stock?

No. Buying or selling of stocks based on any non-public information is against policy and the law. Doing so may result in significant civil or criminal penalties.



Doing the Right Thing with Our Finance and Assets

5. CONFLICTS OF INTEREST – GIFTS AND ENTERTAINMENT

Accepting or giving gifts or gratuities beyond common business courtesies of nominal value may cause others to doubt our fairness and is against the Company guidelines. It can also raise bribery concerns (see “Doing the Right Thing in the Marketplace—Anti-Corruption and Anti-Bribery.”)

- Gifts and gratuities must be reasonable, occasional, and of modest (small) value.
- Gifts may not include cash.
- Giving a gift of any kind, including entertainment, to any government employee or official (or their immediate family members) is prohibited.
- Accepting a gift from any government employee is prohibited.
- Gifts and entertainment must be accurately recorded in our financial records and, if required, the employee’s wage records.
- Employees must not ask for gifts, entertainment, or any favor of any value from anyone with which we currently or may do business.
- Any gifts or entertainment must have a business purpose and must honor the guidelines used by the recipient’s company if they are more restrictive than ours.
- Adult entertainment activities in connection with business are not permitted.
- Consult with your manager, Global Ethics, Human Resources, Legal, or the Ethics Helpline if there are any questions.



Doing the Right Thing with Our Finance and Assets

5. CONFLICTS OF INTEREST – GIFTS AND ENTERTAINMENT



I want to provide a gift to a client during the holiday season. What is allowed?

For non-government clients, first, check with your client to see what their company's gift policy allows. Then consult with your manager, Global Ethics, Legal, or the Ethics Helpline to see if there is a modest gift consistent with the client's company's gift policy. For government clients, gifts and entertainment are not permitted.



A client with whom I have been working closely recently presented me with \$300 cash and a plaque for outstanding service. Can I keep it?

No, you cannot keep the cash, but you can keep the plaque. It is against Company policy to accept cash, or cash equivalents, such as gift certificates from clients.



I've become friends with a consultant to Pitney Bowes. Sometimes we go out for dinner, and she pays the bill. Is this okay?

If there is a business relationship between you and the consultant, you should follow the policies set forth by the Company regarding gifts, gratuities, meals, and entertainment. While the dinner may not be intended to influence decisions or obtain preferential treatment, there may be a perception that it is doing so. Keep in mind that some meals, tickets to events, and other items may be worth more than "nominal value" and are in direct conflict with our guidelines.



Our Communities

1. Charitable Giving and Community Involvement
2. Political Contributions and Activities/Lobbying
3. Environmental Compliance and Sustainability
4. External Communications and Disclosures

Doing the Right Thing in Our Communities

Pitney Bowes strives to be a good corporate citizen. We operate from a framework where we consider the good of the Company as well as the good of the communities where we live and work. This framework guides decisions that impact the environment, our reputation for being socially responsible, our commitment to volunteer and charitable programs, and our freedom to participate as individual citizens in the political process.

1. CHARITABLE GIVING AND COMMUNITY INVOLVEMENT

Pitney Bowes encourages employees to engage in community service and contribute to community programs. Employees seeking Company contributions for any charitable purpose or community service activity need prior approval from Global Corporate Citizenship & Philanthropy.

Charitable or community service activities must be approved in advance, by business unit management and Global Corporate Citizenship & Philanthropy, in accordance with the corporate policy on charitable giving.



My co-worker's wife was in an accident. She has a rare blood type, and we want to solicit blood donors via company e-mail. Can we do this?

You may not solicit via email or posting of solicitations anywhere in the workplace, including bulletin boards (physical or electronic). However, Human Resources may be able to assist you in identifying other options available to you.



Doing the Right Thing in Our Communities

2. POLITICAL CONTRIBUTIONS AND ACTIVITIES/LOBBYING

POLITICAL CONTRIBUTIONS

Employee participation in the political process is a personal decision and voluntary. Any use of Company funds or resources for political activities or contributions must be pre-approved by Global Government and Regulatory Affairs. Employees may not engage in lobbying the government without prior approval from Global Government Relations.

Business units seeking to engage in any lobbying for Pitney Bowes must obtain permission from Global Government and Regulatory Affairs. Private political activity must not be conducted in the name of, or be associated with, the Company.



I'm attending a fundraiser for my state's Congressional representative. I know she's supported issues important to Pitney Bowes in the past. Can I make a contribution to her campaign on Pitney Bowes behalf?

No. You can decide to contribute personally, but you cannot make political contributions on behalf of the Company. The Pitney Bowes Political Action Committee (PAC) chooses where to make contributions on behalf of the Company. Note that certain senior leaders are subject to additional limitations on personal contributions from pay-to-play laws.

If you have any questions, please contact Global Government and Regulatory Affairs at govtaffairs@pb.com.



Doing the Right Thing in Our Communities

2. POLITICAL CONTRIBUTIONS AND ACTIVITIES/LOBBYING

LOBBYING

Lobbying means communicating with government officials in order to:

- Influence policy, legislation, regulations, administrative decisions and/or guidelines
- Influence decision-making regarding contracts within government entities



When my business unit needed to hire a lobbyist last year, we got approval from Global Government and Regulatory Affairs. A new issue has come up with the same government agency. Can we hire the same lobbyist we used last time?

Lobbying activities are strictly regulated by law. The laws change over time, so getting approval to engage in lobbying activities does not mean you have blanket approval to engage in future lobbying activities. If you require lobbying support, contact the Global Government and Regulatory Affairs department, which retains and manages all lobbyists.



My manager implied that if I make a contribution to support his political candidate, I'd be next in line for a promotion. Is that appropriate?

No. Employees, including managers, while at work may not demand or solicit any political contributions or support. While a manager may invite you to a political function, you should be able to decline without any fear of retaliation.



Doing the Right Thing in Our Communities

3. ENVIRONMENTAL COMPLIANCE AND SUSTAINABILITY

We follow all Company, business unit, and facility procedures and comply with all applicable laws regarding product manufacture, distribution, and disposal. We must ensure that we have all required government permits, approvals, and controls before engaging in any activity that could harm the environment or people.

Learn and understand all job-related responsibilities for ensuring that our operations and our products meet applicable government, client, and Company environmental requirements impacting air, water, land, and waste.



Our town is having a hazardous waste collection day. Can I bring waste chemicals from our plant to this event?

No, these local events are for homeowners to assist them in getting rid of these wastes. Pitney Bowes has established contracts with hazardous waste management companies to manage these wastes for us. If you have any questions, please contact Environmental Health & Safety or email EHS@pb.com.



Doing the Right Thing in Our Communities

4. EXTERNAL COMMUNICATIONS AND DISCLOSURES

Pitney Bowes External Communications and Disclosures to the public—including shareholders, suppliers, clients, and competitors—will always be accurate and in compliance with the law while still protecting our Company’s confidentiality and interests.

Pitney Bowes communicates with the public and the investment community in a manner designed to provide broad access and circulation. No employee may disclose internal material information concerning the Company to any person outside the Company (except to its advisors who have agreed to keep the information confidential) unless such information has been previously or is being simultaneously disclosed to the public. The Company will consider a violation of this policy to be a serious matter and will take appropriate disciplinary action against any person involved in such a violation.



I have been asked to make a presentation at a trade association meeting. Is this okay?

Yes. However, if the presentation involves your work at Pitney Bowes, it requires approval by your department head and Corporate Communications. You must be sensitive to issues related to the security and protection of advanced technologies.



Doing the Right Thing in Our Communities

4. EXTERNAL COMMUNICATIONS AND DISCLOSURES

If you are approached by a reporter about a Company matter, you must not respond to the inquiry yourself, even by saying “no comment.” Refer all questions to the appropriately authorized spokesperson for a response as follows:

- Investor Relations and senior management, who carry out regular communications with shareholders and the financial community
- Corporate External Communications for all media inquiries
- Legal for contacts with all outside lawyers
- Human Resources, who handle all employment information about current and former employees



A reporter called to ask for a comment in connection with my work. I knew the answer to the question, but I wasn't sure if I should tell him what he wanted to know.

You must not answer any questions from reporters. Refer the reporter to Corporate Communications. They will determine how the Company should respond.



I want to run for town council in my hometown, where Pitney Bowes has an office. Decisions affecting Pitney Bowes might come before the council for a vote. Is it okay for me to run for office?

In most cases it would be fine for you to hold a public office, but you need to disclose it to your supervisor first.



Pitney Bowes



BUSINESS PRACTICES GUIDELINES

Failure to follow these Guidelines may result in disciplinary action up to and including dismissal as and where appropriate.

It is important to note that these Guidelines are not a contract of employment and do not create any contractual rights of any kind between Pitney Bowes, its directors, officers, employees, or any third parties.

In the US, employment is 'at will,' which means that an employee or the Company may terminate employment at any time, for any reason or no reason at all. The exception is the presence of an applicable collective bargaining agreement, specific employment contract, or as required by law.