



Human Resources

Toppan Merrill's recognition as a premier global provider of technology-driven communication solutions for our clients and the markets we serve means measuring success not only in our results but by our clients and colleagues as well. Toppan Merrill and its employees are defined by a commitment to personal integrity and ethical business practices. We expect the highest standard of personal and professional behavior and our policies, practices, standards, and code of conduct set forth these expectations and provides a framework for security awareness.

Pre-Employment Screening

- Prospective employees and contingent workers are subject to background screening and may include checks against various databases including federal criminal records, Fraud Abuse Control Information System (FACIS), Office of Foreign Assets Control (OFAC), and others.
- Other screening checks are performed dependent on the type of work being performed, for example conducting monthly Office of Inspector General (OIG) and General Service Administration (GSA) checks to ensure compliance for Toppan Merrill employees and contractors serving regulated industries.

Training

- At hire, employees sign acknowledgement of employee handbooks, both for enterprise level and based on the specific international geographical area where their work functions are performed. Additionally, employees must review and affirm Toppan Merrill policies regarding Code of Conduct and Conflict of Interest.
- Employee handbooks establish behavioral expectations, an environment that is consistent in its application of policies and practices and sets precedents for employee maintaining responsibility for monitoring company resources for updates to policies, practices, procedures, security updates, and more.
- Security and Legal Compliance & Privacy trainings are required of employees at hire and contingent workers at engagement and are administered annually thereafter. These trainings are created using standard industry and best practices curriculum and provide the most up-to-date scenarios along with required review of Toppan Merrill's related policies and procedures.

Confidentiality

- When appropriate, Toppan Merrill utilizes non-disclosure agreements with employees and external parties including contingent workers, vendors and clients to ensure the protection of information (i.e. PHI, PII/PI, etc.). These agreements are also essential in ensuring the control of nonpublic proprietary and confidential information, such as specifics of Toppan Merrill's physical security and information security protocols.

Repercussions

- Failure to comply with Toppan Merrill's policies, practices and procedures may result in discipline up to and including termination.

