

**♣** 3D SYSTEMS

# **Code of Conduct**



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# Message from Our Leader

**Jeff Graves | President and Chief Executive Officer** 



For many years, we have proudly maintained our position as a leader in the Additive Manufacturing industry. Our success is a testament to the dedication of our exceptional team, our product innovation, and our unwavering commitment to customer excellence. Importantly, it is the ethical conduct and integrity demonstrated by all of us that drives our Company's success.

Acting with integrity is crucial as it builds trust with our customers, partners, and within our teams. Trust is earned through consistent, honest, and ethical behavior. Day in and day out, we must uphold the highest ethical standards in all of our decisions and actions. To support us in everyday decision making, we must embrace the principles outlined in our Code of Conduct. Our Code outlines standards for ethical conduct and is designed to empower each of us to properly handle business situations we may encounter as a global company.

By incorporating integrity into our daily routines, we create a strong, dependable culture that inspires confidence in our stakeholders and reinforces our commitment to excellence. This daily dedication to ethical conduct fosters resiliency and adaptability, preparing us to meet challenges with unwavering principles.

Together, we all contribute to a culture of integrity and accountability that will propel us in shaping the future of additive manufacturing for our customers and our Company.

Sincerely,

Jeff Graves | President and Chief Executive Officer

# Message from Our Leader

Phyllis Nordstrom | Chief Administrative Officer



As we strive for excellence in all aspects of our operations, I am proud to introduce our updated Code of Conduct, which aligns to our Company Values and embodies our commitment to conduct business ethically. Our Code of Conduct applies to all of us and outlines our commitment to each other and to 3D Systems to operate ethically and honestly. It is an essential resource to help guide our behaviors throughout our daily business interactions.

Because we operate in locations around the world, the laws, regulations, and customs may differ between regions. However, no matter where we work, we are all responsible for adhering to global laws and following the ethics principles outlined within our Code of Conduct. The Code is not designed to provide guidance for all situations, and as such, we must rely on our own good sense to assess if our actions align with 3D Systems' ethical standards.

I encourage you to closely read through our Code of Conduct and seek clarification if you need further guidance. Furthermore, please use our Code to identify business situations that may require you to ask questions or promptly report potential concerns.

The ethics and compliance team is here to offer you support, answer your questions, and help address your concerns. Please proactively partner with our team to support an ethically responsible culture. It takes all of us working together to ensure 3D Systems' continued success.

Thank you for your partnership.

Sincerely,

Phyllis Nordstrom | Chief Administrative Officer

# **Our 3D Systems Values**

#### Our values are the heart of our culture.

They represent our identity, and they are our guideposts for everything we do. Our values articulate what we do to achieve meaningful results and make a difference for our customers, stakeholders, and each other. Our values are embedded throughout our commitments and expectations outlined in this Code of Conduct.





# **Grow Profitably**and Win

We know that our capacity to serve our customers, invest in growth and technology, and reward our people directly depends on our ability to make a profit and generate cash flow.

We wake up every day and ask, "How can we make our Company a better version of itself today?" We focus our efforts on key areas where we can win and we're accountable for our results. To us, profit and purpose go together: we need both to make a positive impact.



# Deliver "Extraordinary" to Our Customers

We believe that delivering "extraordinary" starts with empathy: deeply understanding our customers and their needs.

We are passionate about helping our customers succeed and make a difference. And we know that quality is vital at every customer touchpoint so we continuously raise our own bar and obsessively measure and improve through a customer-centric view.



# Innovate with Purpose

Innovation is at the core of who we are: our job is to reimagine and re-engineer the world around us.

Each of us owns taking thoughtful risks (failing fast and learning quickly), speaking up, listening to each other's ideas, and continuously improving quality in all areas of our work. We are extremely proud that human (and animal) lives are better because of what we do.



# Trust and Empower

To be truly excellent, we believe everyone needs to show leadership. We inspire each other. We help each other. We cultivate optimism and have fun together.

We are constant learners, and we value diversity in people and ideas. And we go beyond our work and contribute our talent, time and energy to our communities. We work together to create something much bigger than ourselves.



#### Build Great Teams

#### We approach all relationships

with trust, respect, and care. We create a climate where things get done by empowering and encouraging one another to openly discuss challenges and solve problems quickly.

We are "in it together" and everyone is responsible for recognizing, appreciating, and bringing out the best in others. And we are absolutely committed to acting with integrity in all that we do.





# **Following Our Code**

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# Using the Code

## The Purpose of our Code

Our 3D Systems Code of Conduct (hereinafter referred to as the 'Code') plays a vital role in shaping our Company culture, aligning expected behavior to our Company Values, and promoting ethical conduct. It serves as a reference point and a standard of conduct for all of us as employees of 3D Systems, regardless of our role or level. Our Code highlights principles to guide our actions and help us do what is right, supports us in navigating challenging situations that may arise in our daily work, and provides guidance to ensure compliance with the laws and regulations applicable to our global business. The Code covers a wide variety of situations that you may encounter as an employee. The Code cannot cover every possible work situation, but it is a good reference point to support you when you are unsure about the proper way to handle a business situation.

### Who the Code Applies to

We expect all employees, officers, and directors, and anyone doing business on behalf of 3D Systems, to act in accordance with the principles in our Code and all applicable laws and regulations. We expect employees and officers of the Company to understand and follow our Code and any 3D Systems policies referenced. When each of us follows the Code, we communicate our commitment to 3D Systems' Values.

#### When a Violation of the Code Occurs

It is important to note that failure to follow the law, 3D Systems' policies, or our Code, could result in disciplinary action, up to and including termination of employment. Further, a violation of laws and regulations could lead to civil penalties, criminal prosecution, and fines.

### **How our Code is Organized**

Each topic outlined in the Code provides foundational guidance as follows:

- Our Commitment: What we believe as a Company, why this topic is important, and the way we work to fulfill our commitment.
- Our Expectations: The actions expected of you to act with integrity and follow applicable laws and regulations.
- **Key Policies:** Related policies that exist at 3D Systems that support compliance with global laws and regulations.
- **Example Scenario:** An example situation that may arise at work, and guidance on how to handle the situation.
- Key Highlights: Essential guidance, key definitions, or other critical points of interest to support compliance and ethical conduct.
- How To Ask Questions and Report Concerns: Who to contact if you have questions or need to report a concern.





# **Making Ethical Decisions**

### **Understanding Your Impact**

Ethical decision making is essential to the success of 3D Systems. When faced with a difficult situation, sometimes it is hard to know the right thing to do. Consider the questions below before deciding or acting.

- Is it legal?
- Is it consistent with our 3D Systems Values, our policies, and our Code?
- Is it in the best interest of our customers, employees, and our Company?
- ✓ Would you openly take accountability for your action or decision?
- If it were made public, would you still feel confident about your actions and/or would it reflect negatively on 3D Systems' reputation?

If you are not sure, consult your manager, People and Culture Business Partner, or the ethics and compliance team at <a href="mailto:compliance@3dsystems.com">compliance@3dsystems.com</a>.

If you answered "no" to any of these questions, ask for guidance or stop and <u>report</u> <u>your concern.</u>

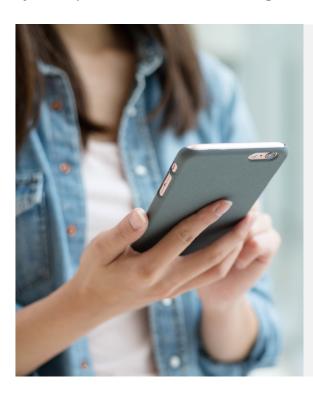
# **Asking Questions and Reporting Concerns**

## **Asking Questions**

If you have questions or need guidance, reach out to your manager, your People and Culture Business Partner, or the ethics and compliance team at <a href="mailto:compliance@3dsystems.com">compliance@3dsystems.com</a>.

# **Reporting Concerns**

Have the courage to say and do what is right. Be bold and speak up. If you see, experience, or suspect activity that violates our Code, 3D Systems policies or local laws and regulations, promptly report in good faith using one of the reporting options below.



#### Report a concern within 3D Systems:

**Talk** to your manager, <u>People and Culture Business Partner</u>, or the ethics and compliance team.

**Email:** <a href="mailto:compliance@3dsystems.com">compliance@3dsystems.com</a>.

#### Report a Concern Anonymously with 3D Systems Open Line external service:

- Website: https://www.lighthouse-services.com/3DSystems
- Email: reports@lighthouse-services.com (must include Company name)
- Call:
  - o English speaking USA and Canada: 833-880-0002
  - o Spanish speaking USA and Canada: 800-216-1288
  - o French speaking Canada: 855-725-0002
  - o Spanish speaking Mexico: 01-800-681-5340
  - All other countries: 800-603-2869 (must dial country access code first)

# **3D Systems Response**

Every reported allegation received is appropriately investigated and only necessary partners are involved in the review. If your report is substantiated, 3D Systems will act promptly and appropriately. Employees are expected to cooperate fully with any activities to assess a reported concern. The outcome of a substantiated report may be kept confidential based upon the nature of the matter.

# Reporting a Concern, Confidentiality, and Non-Retaliation

### **Reporting A Concern**

If you become aware of circumstances that seem inconsistent with our Code or if you are instructed by your manager to act in a manner that contradicts our principles, please report your concerns using one of the many <u>reporting channels</u> available to you. Within our policies as well as external regulations, there are protections for individuals who report concerns in good faith, highlighting the importance of safeguarding ethical standards. These principles are vital for protecting both our Company and our employees, promoting accountability, transparency, and a culture of integrity.

# **Confidentiality**

If your concern requires confidential treatment, we will make all reasonable efforts to maintain confidentiality, except to the extent necessary to conduct an effective review or as required under applicable law, regulation, or legal proceedings.

#### **Non-Retaliation**

3D Systems does not tolerate retaliation of any kind against someone who reports a concern in good faith. Anyone who engages in retaliation against someone who asks questions or voices a concern, violates our Code and may face disciplinary action, up to and including termination of employment, regardless of that person's position within the Company.

If you have concerns about retaliation, you should report them to your People and Culture Business Partner, <a href="mailto:compliance@3dsystems.com">compliance@3dsystems.com</a> or anonymously to 3D Systems' Open Line.



# **Understanding Your Roles and Responsibilities**



#### As an employee of 3D Systems, you are expected to:

- Conduct business ethically, openly, and honestly and act with integrity in all that you do.
- $\checkmark$  Read, understand, and follow our Code carefully and refer to it when helpful.
- $\sqrt{\phantom{a}}$  Read and be knowledgeable of policies that apply to your job responsibilities.
- $\checkmark$  Comply with the laws and regulations applicable to our global Company.
- Actively participate in and complete all assigned Company trainings.
- $\checkmark$  Seek guidance and ask questions before acting when something is not clear.
- Stay alert and report concerns of potential violations of our Code, our policies, or laws and regulations.

#### Managers, you have additional responsibilities:

- Lead by example to uphold our Company Values and promote ethical decision-making.
- Talk openly about ethical practices in your business area and let employees know that you expect them to follow the Code.
- Refer to our Code and talk about where employees can go for resources and answers to questions.
- Create and promote a speak up culture by encouraging employees to come to you when they need guidance or have questions.
- Ensure you and your employees complete assigned trainings timely.
- If you become aware of a violation, a potential violation, or any other concern, report your concerns immediately using one of the <u>available reporting options</u>.
- Do not retaliate and do not allow others to retaliate against an employee who reports a concern.



# Working as a Team

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# Cultivating Inclusion and a Sense of Belonging

#### **Our Commitment**

We empower innovation through our people. To drive this vision, we are committed to fostering an environment where inclusion is central to how we work across our global teams and creating opportunities for our diverse workforce to connect. We support an inclusive environment that values unique perspectives, empowering employees to share their experiences, build connections, continuously learn, and develop. Cultivating a sense of belonging requires active participation by all of us, where everyone feels accepted and valued. Building connections and a sense of belonging is the foundation to unlocking the value of our diverse teams.

Every individual deserves an opportunity to succeed, and we support our employees with equal opportunities to grow, contribute, and develop as an Equal Opportunity Employer. Additionally, as a U.S. government contractor, we also comply with our Affirmative Action Program and apply the principles of this program on a worldwide basis.

We expect people leaders to make all employment decisions only on valid job requirements and in support of our equal employment opportunity and affirmative action commitments. We prohibit harassment, discrimination, or retaliation in any employment decision including, but not limited to, hiring, placement, promotion, demotion, transfer, training, compensation, benefits, or termination.

- Equal Employment Opportunity, Anti-Discrimination and Anti-Harassment Policy
- Equal Employment Opportunity Policy Statement
- Open Door Policy

# **Our Expectations**

#### **Embrace Diversity**

- Recognize and respect that each of us has unique attributes and experiences and brings different viewpoints to work every day.
- Seek to understand the viewpoints of others as our differences can be one of our greatest strengths.
- Participate in training and awareness initiatives.

#### Be Inclusive

- Create a safe environment for each other, to help those around us feel welcomed, respected, and valued.
- Empower employees to share their experiences. By encouraging all voices to contribute to the conversation, we add immeasurable value to our decision-making processes and allow for appropriate representation.
- Encourage transparent communication, foster a supportive work environment, and maintain open channels of communication to ensure that all voices are heard.
- Be cognizant of societal issues which may impact our global colleagues and teams.

#### Treat Each Other Fairly and Justly

- Respect our commitment to build and maintain a work environment that promotes equal employment opportunities for applicants and employees without regard to certain groups, classes, or protected categories.
- If you are responsible for making or influencing hiring, promotion, or other career decisions for 3D Systems, support our equal employment opportunity and affirmative action commitments throughout our operations worldwide.





### **Example Scenario**

- A colleague often dominates the weekly team meeting conversation, interrupting others and steering the discussion in her direction. David feels overshadowed and seldom gets a chance to speak. This has been ongoing and it is really upsetting to David. Should he voice his concerns?
- Yes, his colleague is unintentionally creating an environment where not all voices are heard, which can lead to feelings of exclusion. Effective meeting practices that promote respectful and inclusive participation are essential for fostering a collaborative work environment.

# **Key Highlights**

- Diversity refers to the unique set of features that make up each one of us. These include our personality, work experiences, ethnicity, race, religion, gender identity, sexual orientation, age, disability, veteran status, and more. We celebrate each others differences.
- **Equity** means individuals are treated justly and fairly, resulting in equal access to opportunities and resources.
- Inclusion means appreciating and respecting the presence, contribution, and perspectives of all people in the workplace.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to your People and Culture Business Partner.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our reporting options.



# **Investing in Success and Growth**

#### **Our Commitment**

Our teams are essential to our success, as each of us brings unique skills, perspectives, and talents that are key to achieving our Company priorities. We have a dedicated People and Culture team that supports our employees and managers through a structured talent management framework that includes performance reviews, goal setting, and career development discussions. Additionally, we are dedicated to identifying future leaders through succession planning, ensuring that our workforce remains strong and capable to meet future challenges.

# **Our Expectations**

#### **Actively Engage**

- Reflect on your accomplishments each year and discuss with your manager.
- Be open to receiving constructive feedback and use it to improve performance and skills.
- Collaborate with your manager to set realistic, challenging, and aligned goals.
- Take ownership of your personal development by seeking out opportunities, skill development, and career advancement resources.
- Utilize 3D System's talent management systems, tools, and guidance.

#### **Manage Your Teams**

- Conduct thorough and objective performance reviews, providing actionable feedback to employees.
- Offer consistent support, mentorship, and guidance to help employees achieve their goals and address any challenges they may face.
- Support your employees career aspirations through regular career development discussions.
- Identify and develop high-potential employees to ensure a pipeline of future leaders.
- Focus on your development as a people leader.



# **Key Highlights**

- Visit Connect3D, our Company intranet, for step-by-step instructions, guidance, and training materials to support you and your teams with talent
  - Onboarding

activities such as:

- Performance reviews
- Goal planning
- Career development

### **Example Scenario**

- An employee named Alex updated his Individual Development Plan (IDP) as part of his mid-year check-in status. His manager has not set up a meeting to discuss his IDP and career development goals. What should he do?
- Alex should work with his manager to arrange a meeting time on their calendars to discuss his IDP. For additional resources, he and his manager should leverage the Employee and Manager Development Toolkits located on Connect3D, our Company intranet.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to your People and Culture Business Partner.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our reporting options.



# **Upholding Equality and Respect**

#### **Our Commitment**

We are committed to providing a respectful workplace free from harassment and discrimination. We all play a role in upholding a work environment where everyone feels welcomed, valued, and respected.

We expressly prohibit any form of unlawful discrimination including, without limitation, harassment, on the basis of race, color, ethnicity, religion, creed, sex, age, sexual orientation, genetic information, marital status, gender identity, national origin, disability, pregnancy, childbirth, medical needs arising from pregnancy or childbirth, and related medical conditions including, but not limited to, lactation, protected veteran status, or any other category that is protected in accordance with applicable laws.

Harassment in any form will not be tolerated, including sexual, verbal, or physical harassment. This prohibition applies whether the conduct is direct or indirect, intentional, or unintentional. Harassment and other intimidating or disrespectful behavior can do widespread damage, harming those who are directly targeted as well as other members of the team, and the general workplace environment.

- Equal Employment Opportunity, Anti-Discrimination and Anti-Harassment Policy
- Equal Employment Opportunity Policy Statement

### **Our Expectations**

#### Do Not Discriminate Based on any Group, Class, or Protected Category

 Treat fellow employees with dignity and respect, including people leaders, whose position at 3D Systems may enable them to influence the job security, compensation, promotion, or career of other employees.

#### Be Aware

- One of the best ways to prevent harassment is through awareness, using care in your own interactions, and to practice bystander intervention by speaking up if you encounter these situations.
- If you witness harassment of your colleagues, encourage them to speak up as well.
- Stay vigilant regardless of your environment. Harassment can happen both in person and virtually through meetings, emails, social media, texts, and more.
- It is a common misconception that harassment only occurs from supervisor to staff, but a harasser can be someone not in a position of direct authority over the alleged victim.
- Actively participate in assigned trainings on related requirements.

### Recognize the Signs of Sexual Harassment

• Be aware of your behavior towards others, as sexual harassment can occur unintentionally.





# **Example Scenario**

- My direct report was recently promoted, and a peer made disparaging comments to me about the individual's gender stating that the promotion was only based on meeting gender benchmarks and not the individual's qualifications and skills. Should I report it?
- Yes. We do not tolerate harassment or disparaging comments. Report your concerns through one of our <u>reporting options</u>.

# **Key Highlights**





Sexual harassment includes asking someone out repeatedly, sexual advances or requests for sexual favors, inappropriate touching, sharing of sexual materials or jokes, continuing to make sexual advances after being refused, or any other inappropriate verbal or physical conduct.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to your People and Culture Business Partner.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our reporting options.



# **Protecting Human and Labor Rights**

#### **Our Commitment**

3D Systems is committed to conducting our business in a manner consistent with all applicable employment laws and global human and labor rights laws, rules, and regulations, wherever we operate globally.

This means, in part, we provide reasonable working hours and fair wages that meet or exceed requirements set by local laws for those who work on our behalf. We have zero-tolerance for the use of child labor, modern slavery, forced, bonded, or compulsory or indentured labor or human trafficking practices. We also will not knowingly do business with business partners, vendors, or suppliers who engage in these practices.

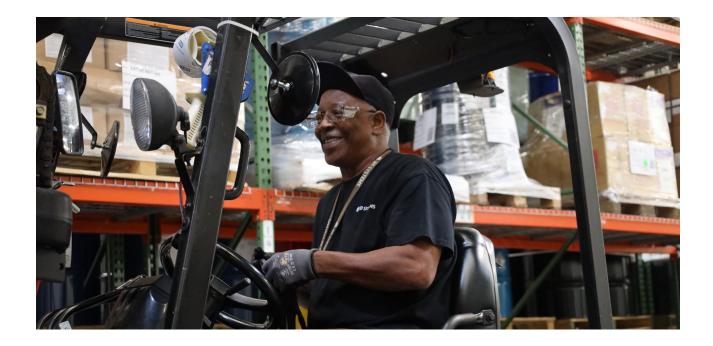
# **Our Expectations**

### **Put People First**

- Follow 3D Systems policies to comply with applicable laws and protect human and labor rights across our global operations.
- Provide a safe workplace with fair labor conditions and reasonable work hours.
- Promote a positive work environment by encouraging employees at all levels to work together collaboratively to resolve workplace matters in an open environment.
- Strive to give everyone access to similar opportunities through inclusive experiences and standard practices.

#### Hold Partners Accountable

- Hold our global partners, suppliers, vendors, contractors, and other stakeholders accountable to human and labor rights and high ethical standards.
- Do not knowingly do business with those who do not follow our standards of conduct.



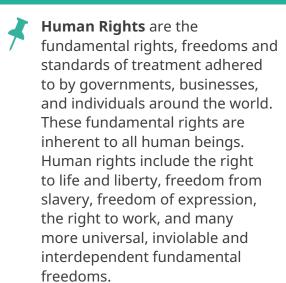
### **Example Scenario**

- While scrolling on social media, I read a post that mentioned breaking news about a vendor our department works with. They are amid an investigation for a situation involving violation of local labor laws. Do I need to report this, even though the investigation is not final?
- Yes, you should report your concern through one of our <u>reporting options</u>. We expect all vendors we do business with to uphold the values and business practices as we do. It is important to notify someone so that we can evaluate the situation and determine how it may impact our Company.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to your People and Culture Business Partner.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting options</u>.

# **Key Highlights**



Labor Rights are based on international principles set forward by the International Labour Organization, which include a wide range of protections and standards designed to promote fair and safe working conditions worldwide. Some examples include no forced labor, right to a living wage, and right to decent working conditions.

- Human Rights and Labor Rights Policy
- Anti-Human Trafficking Policy
- Supplier Code of Conduct





# Promoting Health and Workplace Safety

#### **Our Commitment**

We are committed to creating a safe, secure, healthy, and injury-free work environment for our employees, customers, partners, and visitors. We maintain compliance with all applicable health, safety, and security standards across our global locations.

To assist in achieving our commitment, we conduct business in a manner that fosters a culture of continual improvement and excellence through communication, awareness, and visible leadership.

Our site managers for Environmental, Health, and Safety (EHS) oversee our health and safety programs and provide substantial safety trainings on the wide variety of situations employees may find themselves in. They also arrange for the necessary health and safety equipment at all of our facilities. Each 3D Systems' site has specific safety programs in place for our employees.

Regardless of whether you are working in a potentially high-hazard environment or common office space, we have prepared informational guides that outline the best practices and actions to take in a multitude of different scenarios. We monitor injury and illness health and safety metrics across our Company to continually evaluate our safety programs to meet the needs of our teams.

- Environmental Health and Safety Policy
- Safety Policy
- · Alcohol and Drug Free Workplace Policy

- Global Visitor Policy
- Emergency Action Policy

### **Our Expectations**

#### **Protect Yourself and Your Colleagues**

- Commit to maintaining a safe and healthy work environment.
- Read and follow our 3D Systems policies and procedures to comply with applicable laws, rules, and regulations.
- Proactively identify and eliminate unsafe actions and conditions, taking proper actions when unsafe situations arise to protect yourself and those around you.
- Immediately report any accident or injury that occurs while you are working to your manager, People and Culture Business Partner, or EHS representative.

#### Show Up to Work as Your Best Self

- Practice and promote high professional standards.
- Do not use alcoholic beverages or illegal nonprescription controlled substances in the workplace, as these activities are incompatible with employment at 3D Systems.

#### **Prevent and Watch for Violence**

• If you ever see or suspect harmful behavior or weapons or experience a threat, immediately report your concern. Every threat of violence is serious.

#### Be Mindful of Visitors at Your Site

- Follow our Global Visitor Policy to ensure only authorized people have access to our 3D Systems facilities.
- Partner with the appropriate teams properly screen and grant visitor access to our buildings and restricted areas within.

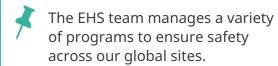


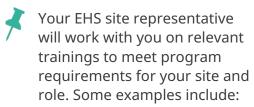


# **Example Scenario**

- My job requires the use of personal protective equipment (PPE). However, I am unable to locate the PPE I am required to wear. I would like to work without it because I am busy with a full backlog of projects. What should I do?
- Please refrain from performing any tasks that require PPE without the necessary safety equipment. Contact your supervisor or site EHS representative for assistance in obtaining the appropriate protective equipment. Our commitment to your safety is not negotiable.

# **Key Highlights**





- Fire Prevention Program
- Respiratory Protection Program
- Hearing Conservation Program
- Ladder Safety Program
- California Workplace Violence Prevention Program
- Personal Protective Equipment Program

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to your EHS site representative or People and Culture Business Partner.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our reporting options.





# **Protecting Our Company**

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# Maintaining Integrity in Business Records

#### **Our Commitment**

We are committed to creating, protecting, storing, retaining, and disposing of all business information in a way that supports our Company to comply with retention laws, meet our business needs, ensure records are available when needed, and preserve relevant documents in cases of litigation, audits, or investigations.

Business information we create, receive, maintain, or use at 3D Systems as evidence in activities, decisions, transactions, or other business operations are known as records, whether in physical or digital format. Records are considered official records or transient records, and our Records Management Policy governs official records to meet record retention requirements. Official records must be maintained in defined Company systems as a records repository.

### **Our Expectations**

#### Properly Identify, Use, and Store Business Records

- Properly identify, categorize, store, and dispose of records in accordance with our records retention schedule for your business area.
- Use authorized 3D Systems devices and systems to ensure appropriate administrative, technical, and physical safeguards are in place to preserve and protect your records.
- Do not use non-approved business communication tools or software to conduct business or retain business records.

#### Know How to Handle a Legal Hold on Business Records

- If our legal team informs you to put records on hold, do not destroy those records until the hold is released.
- If not subject to a legal hold, dispose of your official records following expiration of the applicable retention period, in accordance with the 3D Systems Records Retention Schedule.



# **Example Scenario**

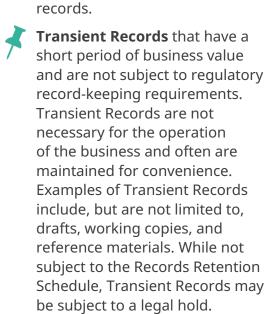
- Jane works on the 3D Systems' sales team and recently closed a deal with a large customer. The contract has been signed and finalized. Jane needs to determine how long to retain the customer contract and any associated documentation. What next steps should Jane take to maintain compliance and support our Company policy?
- Jane should refer to 3D Systems' record retention schedule for this type of official record, per the Records Management Policy. Jane should also ensure that the contract and related documents are properly stored in our Company's appropriate system or record repository for this type of record.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the legal team at <a href="legal.department@3dsystems.com">legal.department@3dsystems.com</a>.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting options</u>.

# **Key Highlights**





- Records Management Policy
- Records Retention Schedule





# **Delivering Accurate Financial Reporting**

#### **Our Commitment**

We are committed to maintaining accurate financial information to allow us to make sound business decisions and provide transparency to shareholders, investors, regulators, and others as needed.

The U.S. Securities and Exchange Commission and other governing bodies have strict rules about the accuracy of our financial statements and disclosures, and the strength of our internal controls over financial reporting.

We all play a role and are accountable for maintaining records that are consistently truthful, reliable, and transparent. We must also conduct our financial oversight and approval processes with the highest standards of integrity.

- Code of Ethics
- Travel and Expense Policy
- Delegation of Authority Policy

### **Our Expectations**

#### Know Your Responsibilities to Ensure Accurate and Complete Records

- Be aware of and follow all finance policies and procedures that guide adherence to accounting standards within your job responsibilities.
- Consistently and timely execute assigned internal controls and control reviews.
- Obtain required approvals before submitting expenses for reimbursement or making payments on the behalf of 3D Systems.
- If you are a people leader, review all expenses submitted by your employees before approving expenses to ensure accuracy and adherence with our Travel and Expense Policy.
- Accurately record your time for reporting purposes.
- Never intentionally misrepresent or falsify a record or transaction.
- Avoid unethical practices that could compromise the accuracy and integrity of financial data.
- Follow Delegation of Authority policy requirements to ensure proper authorization of financial commitments.

### **Raise Questions and Report Concerns**

Raise questions and report concerns for matters you become aware of such as:

- Errors in the preparation, evaluation, review, or audit of our financial statements.
- Errors in the recording and maintenance of our financial records.
- Deficiencies or noncompliance with our internal accounting controls.
- Misrepresentation or false statements regarding a matter contained in our financial records, financial reports, or audit reports.
- Deviation from full or fair financial reporting.
- Altering, deleting, or destroying of records due to concerns about potential litigation, audits, or investigations.





# **Example Scenario**

- I work on the sales team and closed a deal that I had been working on last quarter. The deal was finalized one day after the quarter ended. Since I worked on it in the previous quarter, can I date it back to last quarter?
- No, you cannot backdate the deal. Revenue must be recognized in the quarter when the sale actually occurred, which is when the contract was signed. Changing the close date would not accurately represent our financial records. Please refer to Finance policies for more information.

# **Key Highlights**

- Accurate financial reporting is essential to our Company's integrity and success. It requires meticulous attention to detail and unwavering accuracy in our processes, systems, and internal controls that support financial data.
- Each employee plays a critical role in this process, ensuring that every piece of financial information—whether it is a purchase order, invoice, expense report, payroll record, sales data, and more—is handled with the highest level of precision and care.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to your manager, the finance team, or your People and Culture Business Partner.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our reporting options.



# **Utilizing Company Assets Responsibly**

#### **Our Commitment**

3D Systems provides various Company assets to employees, such as equipment, technology, software, and other business tools to enable us to be productive contributors to our teams and the business.

We must use these assets appropriately for business-related activities and handle them with care to keep them in good condition and protect from loss, damage, theft, or misuse.

We have a responsibility to use Company assets ethically and legally. Be aware that 3D Systems reserves the right to monitor our use of Company-owned assets, such as the network, email system, internet, and computers, except where prohibited by local law.

- Acceptable Use Policy
- Computer Hardware and Accessories Policy
- Mobile Device Policy

- Device Standards Policy
- Social Media Policy
- Use of AI Policy

### **Our Expectations**

#### **Appropriately Use Company Assets**

- Only use Company assets if you have proper authorization or if your job responsibilities permit such usage.
- Do not access your personal email accounts and personal cloud-based storage solutions on Company provided laptops and desktops.
- Never share, loan, or transfer Company assets to individuals or outside organizations without appropriate authorization.

#### Be Aware of Digital Asset Protocols

- Follow 3D Systems' Social Media Policy to ensure that any Company-related posts, comments, or content you share on social media platforms do not disclose confidential or proprietary information.
- Do not represent yourself as a spokesperson for 3D Systems in posts, comments, or content you share on social media platforms.
- Utilize AI tools, such as ChatGPT, with publicly available data only. Do not use personal, confidential, or proprietary information.
- Use sound judgment, be mindful of the impact of your online interactions, and refrain from engaging in behavior that could be considered offensive, discriminatory, or harassing.

#### Handle Company Assets with Care

- Maintain confidentiality and security of Company information and intellectual property when using Company assets.
- Lock your workstations when you step away from them.
- Restrict access to areas in your building that contain sensitive information.
- If you travel on business with Company-issued devices, protect them by always keeping them with you.
- Promptly report any loss, damage, theft, or suspected misuse of Company assets.





# **Example Scenario**

- My daughter is home sick with the flu and needs access to a phone while I am at work. I am planning to leave my work cell phone at home for her to use in case she needs to contact me. Is this allowed?
- No. Company-owned devices should only be used or accessed by the individual it was directly assigned to.

# **Key Highlights**

- Physical Assets are tangible items owned by 3D Systems, such as your desk space, printers, manufacturing equipment, and office furniture.
- Technology Assets are a subset of physical assets that specifically relate to technology tools and resources, such as tablets, laptops, headphones, monitors, mobile phones, software applications, networking devices, and servers.
- Data Assets are intangible digital information and resources that we collect, store, and process using 3D System's physical assets to support our operations and decision-making.
- Digital Assets include digital content, social media accounts, online platforms, and any other digital tools we use to engage with customers, promote our brand, and conduct our business activities.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the IT Helpdesk.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our reporting options.



# **Ensuring the Security of Company Information**

#### **Our Commitment**

We are committed to safeguarding our Company information, which includes employee data, Company data, and customer data, from unauthorized access, use, disclosure, disruption, modification, perusal, inspection, recording, or destruction. Our Company information is a business asset and a crucial piece of our everyday operations.

As a 3D Systems employee, you have access to Company information and play a critical role in ensuring it is kept safe and secure. You must follow our Information Security Policy and related IT policies, including cybersecurity measures, to protect the confidentiality, availability, and integrity of 3D Systems information and systems in accordance with applicable laws.

The security of our Company information, including cybersecurity practices, helps to build and maintain a reputation of trust between our Company, employees, customers, and other stakeholders.

- Acceptable Use Policy
- Information Security Policy
- Information Security Data Policy
- Clean Desk Policy
  - Access Management Policy
- IT Storage Policy
- Incident Response Policy

### **Our Expectations**

#### **Understand Confidentiality**

- Treat Company information as confidential and do not disclose it to unauthorized individuals or organizations.
- Ensure that sensitive data is appropriately protected and accessed only by authorized employees.

#### **Secure Access to Information**

- Use strong passwords that follow 3D Systems' password requirements.
- Avoid sharing login credentials.
- Access data and systems only for which you have appropriate authorization.

#### **Handle Information Appropriately**

- Only utilize authorized software on 3D Systems devices.
- Access, share, and store information you need to do your job, using 3D Systems approved tools, and never share it with anyone who is not authorized to access.
- Third parties must have a non-disclosure agreement or contract in place prior to accessing any non-public 3D Systems information.
- Use 3D Systems authorized tools and processes to securely share information with third parties.

#### Think Before You Click

- Be vigilant in identifying and reporting phishing attempts, suspicious emails, or social engineering tactics aimed at tricking you to disclose sensitive information.
- Exercise caution when opening email attachments or clicking on links, especially if they are unexpected or from unknown senders.
- Verify the authenticity of email addresses.
- Look for signs of phishing and other potential threats, such as generic greetings, spelling or grammatical errors, urgent requests, or suspicious URLs.

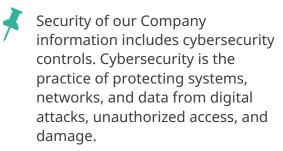






- I received an email today that included a sharing link and Excel file attachment. The email is addressed to me, but the message content and the sender look suspicious. What should I do?
- Do not open or download the attachment and do not click on the link in the email. This could be an external attacker attempting to enter our Company network using the phishing technique. Report this immediately by using the 'Report Phishing' button in your email or contact the IT Helpdesk at <a href="mailto:3DITHelpDesk@3dsytems.com">3DITHelpDesk@3dsytems.com</a>.

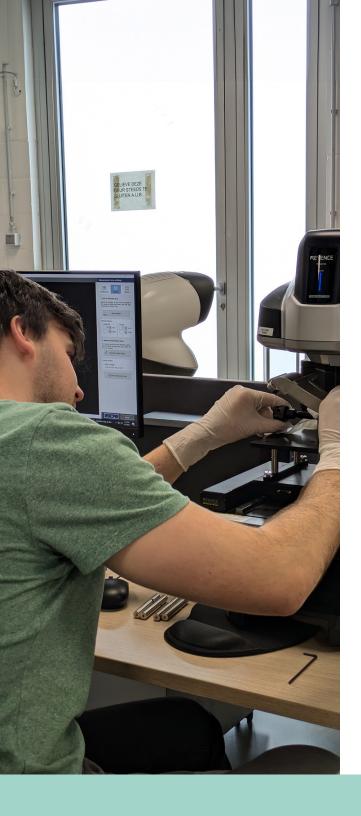
# **Key Highlights**



Check out the Cyber Learning
Center on Connect3D, our
Company intranet, as your
go-to resource for comprehensive
training aids, informative videos,
and other essential materials on a
wide range of cybersecurity topics.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the <u>IT Helpdesk.</u>
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our reporting options.



# **Safeguarding Global Privacy**

#### **Our Commitment**

3D Systems is committed to protecting personal data and following applicable global privacy laws and regulations. Our privacy policy describes how we collect, use, and share personal data, measures we take to protect the security of this data, and other important privacy-related topics.

If you have access to personal data because of the nature of your job, you are required to exercise appropriate care to safeguard the information and keep it confidential. It is your responsibility to only use this data for business purposes and to ensure you follow related 3D Systems policies regarding handling confidential information.

# **Key Policies**

- Global Privacy Policy
- GDPR Privacy Procedure
- North American Privacy Procedure

- Health Data Procedure
- PCI Procedure

## **Our Expectations**

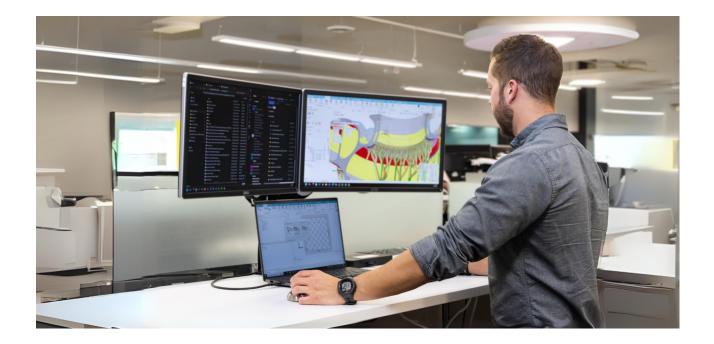
#### **Know What Personal Data Is**

- Personal data is any information that alone, or in combination with other information, can identify an individual. Examples of personal data include, but are not limited to:
  - o Name, age, date of birth
  - Email address
  - Phone number
  - Address
  - IP Address or cookies
- Sensitive personal data is information relating to an individual that should be treated with extra precaution due to heightened risk of exposure. Examples of sensitive personal data include, but are not limited to:
  - o Identification numbers (i.e., Social Security or Government ID)
  - o Banking information and credit card numbers
  - o Personal health data

#### Handle Personal Data and Sensitive Personal Data Responsibly

- Ensure that individuals who receive, transmit, access, or store personal data or sensitive personal data, have a business need to know.
- Report any unauthorized access to personal data or sensitive personal data.
- Destroy, delete, anonymize, or otherwise make personal data unreadable, using 3D Systems-approved methods once it is no longer needed.
- Handle sensitive personal data with additional security measures, such as password protecting files, encrypting files, storing on secure servers or locked cabinets, or pseudonymizing the data. Use strong passwords that follow 3D Systems' password requirements.

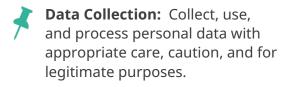


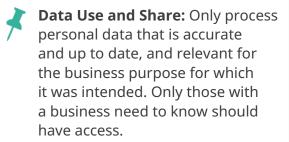


- I unexpectedly received an email with a report detailing personal data about another 3D Systems employee, should I say anything?
- Yes. You should contact the person or department who sent the email to inform them that you should not have received it. Then, report the event to the ethics and compliance team at <a href="mailto:compliance@3dsystems.com">compliance@3dsystems.com</a>.

# **Key Highlights**

#### **Key Privacy Principles:**





**Data Retention:** Retain personal data no longer than is necessary and as defined in the Records Retention policy.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the ethics and compliance team at <a href="mailto:compliance@3dsystems.com">compliance@3dsystems.com</a>.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our reporting options.



# **Protecting Our Intellectual Property**

#### **Our Commitment**

We regard our technology platforms, materials, and other tangible and intangible property generated in our business as proprietary and therefore seek to protect these valuable 3D Systems' assets in the form of intellectual property, such as patents, trade secrets, trademarks, and copyrights. As employees of 3D Systems, you are expected to adhere to intellectual property laws. We have legal rights to protect our creations and inventions through exclusive ownership and control, to prevent others from unauthorized use, reproduction, or distribution.

We also respect and comply with the laws that protect valid intellectual property owned by others outside of 3D Systems. Protecting 3D Systems intellectual property plays a vital role in our success, and it must be maintained in strict confidence unless otherwise required by law or permitted by 3D Systems.

## **Our Expectations**

#### **Maintain Confidentiality**

• Maintain confidentiality regarding 3D Systems proprietary information, trade secrets, and other sensitive data. This includes not sharing such information with unauthorized individuals or using it for personal gain.

#### **Respect Third Parties**

- Respect the patents, trade secrets, trademarks, and copyright of others, and reach out to the legal team to further understand 3D Systems requirements.
- Respect and uphold all licensing and cross-licensing agreements to their fullest extent.
- When using third-party intellectual property under authorized circumstances, give appropriate credit to the original authors or copyright holders. This can be done by citing sources or obtaining necessary permission for use.



- My team is helping test a new material with special properties that makes it more heat resistant. One of my team members wanted to take a picture, but I told them not to because this is currently confidential information and I am concerned that this may expose Company intellectual property. Did I give him the correct guidance?
- Yes. If you are uncertain if information or materials being shared may include Company intellectual property, it is always best to consult our legal team for guidance before sharing information.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the legal team at <a href="legal.department@3dsystems.com">legal.department@3dsystems.com</a>.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting options</u>.

## **Key Highlights**

What you develop while you are employed by 3D Systems may belong to 3D Systems. In some instances, you may not use it for your own benefit or share it with another organization, even after you leave 3D Systems. Here are explanations and examples of various forms of intellectual property:



**Patents:** Grants a time-limited exclusive right to inventors for new and useful inventions, such as our processes, improvements, and product innovations.



Trade secrets: Provides protection for confidential and valuable business information that is a competitive advantage in the marketplace, such as materials formulas, manufacturing processes, customer lists, and marketing strategies.



**Trademarks:** Aims to prevent consumer confusion and safeguard the reputation of our 3D Systems brand, using distinctive symbols like our 3D logo and other brand design elements.



**Copyrights:** Protects original works, such as creative designs, software, and photos.





# **Sustaining Product Quality and Safety**

#### **Our Commitment**

As an additive manufacturing Company, we are transforming the way in which products are designed and manufactured, from hardware and materials to medical devices and dental products. As we develop industry-changing products and services, we must have an unwavering dedication to product quality and safety.

The well-being and satisfaction of our customers and other stakeholders is of utmost importance, therefore we focus on ensuring our products are designed and manufactured to meet product quality requirements, environmental compliance standards, and comply with all applicable global product safety laws and regulations.

This includes adhering to standard processes and obtaining required approvals to place products in the markets we intend to sell, as well as undergoing ongoing supplier due diligence. We monitor evolving global compliance requirements on an ongoing basis to confirm continued compliance with regulatory changes and product updates.

To promote consistency, safety, and quality within the markets we serve, our practices are guided by international standards developed by the International Organization for Standardization (ISO), such as ISO 9001.

We adhere to environmental legal requirements and environmentally responsible practices to reduce risks posed by certain chemicals, substances, and products during manufacturing, importing, use, and disposal to protect human health and the environment across our manufacturing sites. These include laws and regulations such as RoHS, REACH, TSCA, Proposition 65 and WEEE.

# **Key Policies**

Quality Policy

## **Our Expectations**

#### **Quality and Safety Begins with You**

- You must respect and comply with applicable safety, quality, and process standards, regulations, and statutes from the regions in which we operate, and as applicable to your role.
- Know where to find and understand quality and safety requirements for your work.
- If you discover an issue, share the information with your supervisor so that the problem gets resolved quickly and prior to a shipment to a customer.
- Be attentive to detail and identify and report safety hazards.
- Continuously strive for improvements in our quality and safety processes and systems.
- Never cut corners, falsify documentation, skip an inspection, or use an undocumented process.

#### **Ensure Proper Training**

- If you are a leader, make sure any employee who handles our products and materials receives proper training to support product quality and safety regulations and standards.
- Actively participate in trainings assigned to you.
- If you see anyone, including an employee, leader, or vendor compromising our safety or standards, timely report your concerns.





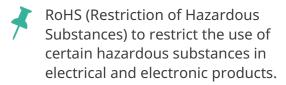
- I have been working on the assembly of our SLS printer. During my last printer assembly, I noticed one of our main parts had a defect. I am concerned we may have broader quality issues with our supplier which could impact our customers. Should I report my concern?
- Your concern is valid. You should promptly report your concern to the production manager to ensure it is reviewed in a timely manner.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to your manager or People and Culture Business Partner.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting options</u>.

# **Key Highlights**

We have practices in place to comply with the following environmental compliance requirements:



REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) to help ensure safe use of chemicals throughout their life cycle.

TSCA (Toxic Substances Control Act) to help ensure that chemicals are safe for their intended purpose.

Proposition 65 (Safe Drinking Water and Toxic Enforcement Act) by being transparent and providing applicable information to the public regarding potential exposures related to our products.

WEEE (Waste from Electrical and Electronic Equipment) to properly collect, recycle, and dispose of applicable electronic waste in an environmentally sound manner.





# **Supporting Environmental Compliance**

#### **Our Commitment**

We are committed to being a responsible steward of the environment as we grow and operate our business. 3D Systems is focused on complying with global and local laws relating to the protection of the environment and Environmental, Social, and Governance (ESG) regulatory reporting requirements.

Within our business we leverage additive manufacturing capabilities to enable our customers to shorten their innovation cycle while also reducing their environmental impact.

We also provide solutions to empower our customers to address their evolving environmental priorities, such as extending product lifespans, addressing material recyclability, and increasing energy and resource efficiency of our products and materials.

Within our facilities, we measure our internal carbon footprint. We encourage employees to find operational opportunities to reduce our environmental impact, specifically focusing on energy use, waste management and recycling practices, and use of natural resources.

### **Our Expectations**

#### **Act Responsibly**

- Follow 3D Systems policies and best practices to comply with environmental laws and regulations.
- Properly dispose of waste and follow recycling practices.
- Handle and store chemicals and other hazardous materials safely.
- Be aware of your impact on the environment.

#### **Report Hazards**

• Be proactive to prevent environmental hazards like improper waste disposal. If you see a potential hazard, do not ignore it — report it to your site's EHS representative.



# **Key Highlights**



Please visit our external environmental disclosures about climate, waste, and water on our Company website at <a href="https://www.3dsystems.com/make-an-impact">https://www.3dsystems.com/make-an-impact</a>.

# **Example Scenario**

- Steve has a 20 kg. bottle of resin that is obsolete and wants to dispose of it as quickly as possible. What steps should Steve take to identify the proper disposal method?
- Steve should contact his regional EHS representative and provide the Safety Data Sheet (SDS) for the material. This is important to ensure our Company complies with environmental safety regulatory requirements.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to <a href="mailto:sustainability@3dsystems.com">sustainability@3dsystems.com</a>.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting options</u>.

# **Key Policies**

- Environmental, Health and Safety Policy
- Waste Management Policy
- Water Policy



# **Conducting Business Fairly and Honestly**

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# **Ensuring Anti-Trust and Fair Competition**

#### **Our Commitment**

We place a premium on honesty and fair dealing in conducting business, and respect the rights and interests of our competitors, customers, suppliers, and other stakeholders. As such, we comply with competition and anti-trust laws to promote and protect fair competition in the marketplace.

We afford our competitors the degree of respect that we expect them to afford us. Therefore, as we compete vigorously and fairly in the marketplaces we serve, we sell our products and services on their merit, and do not engage in misleading advertising, unfair pricing, deceptive trade practices, or other unfair business practices.

By complying with these laws, we contribute to a fair marketplace and compete for business based on the quality of our products and services.

# **Our Expectations**

#### Be Fair and Honest

- Only gather information from competitors using honest methods.
- Respect the confidentiality of business information that you receive from customers, suppliers, or others, regardless of whether that information is specifically covered by a confidentiality agreement.
- Be truthful, accurate, and not misleading in all reports or responses to questions provided within our Company or to our customers, suppliers, financial institutions, government agencies, and any other organizations with a need or right to receive information.

#### Be Aware when Dealing with Competitors

- If you are dealing with competitors, be cautious in sharing information and avoid collusion.
- If approached by anyone to enter such discussions, report the matter immediately.
- Reach out to the legal team to review and approve any business arrangement with a competitor, and to ensure compliance with anti-trust laws.



- My husband volunteers at a local charity, and we learned that the director of the charitable organization works for a 3D Systems competitor. I want to invite them over to dinner to learn more about a new confidential project that this organization is working on. Would this be ok?
- No. You should not solicit confidential business information from a competitor as we are committed to competing fairly. Please contact the legal team if you have questions.

# **Key Highlights**





Below are examples of activities that may violate antitrust laws:

- Price fixing
- Boycotting suppliers or customers
- Disparaging, misrepresenting, or harassing a competitor
- Teaming with companies to try and block competitors and prevent market entry
- Bribery, kickbacks, or stealing trade secrets
- Conditioning the sale of one product on the sale of another unwanted product

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the legal team at <a href="legal.department@3dsystems.com"><u>legal.department@3dsystems.com</u></a>.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting</u> <u>options.</u>



# Complying with Global Trade Requirements

#### **Our Commitment**

At 3D Systems, we do business globally. We are committed to complying with global trade laws and regulations in the countries where we do business.

These laws and regulations change frequently and may differ from country to country. Global trade laws and regulations govern the import and export of technical data, technology, products, parts, materials, software, and services between countries.

These laws and regulations exist to promote national security, foreign policy, anti-terrorism, and we strictly follow these rules to support these goals, as well as, to avoid severe penalties, sanctions, imprisonment, or loss of export or import privileges.

3D Systems has established policies and procedures to facilitate our compliance with global trade laws and regulations. When you engage in international business at 3D Systems', you must follow our global trade policies and procedures.

# **Key Policies**

- Management Commitment Statement
- Global Trade Compliance Policy
- Related Trade Compliance Procedures

#### **Our Expectations**

#### Know That Our Ability to Export and Import is a Privilege

- Remember that our ability to participate in international trade is a privilege granted by governments around the world, it is not a right.
- You must adhere to our 3D Systems' policies and procedures to comply with global trade laws and regulations.
- You must actively review 3D Systems trade communications and participate in 3D Systems trade trainings to have general awareness of trade regulations, understand your specific role and responsibilities, and know how to look for and report "red" flags.
- If you have questions or you are not sure how to proceed, always contact the global trade team for guidance.

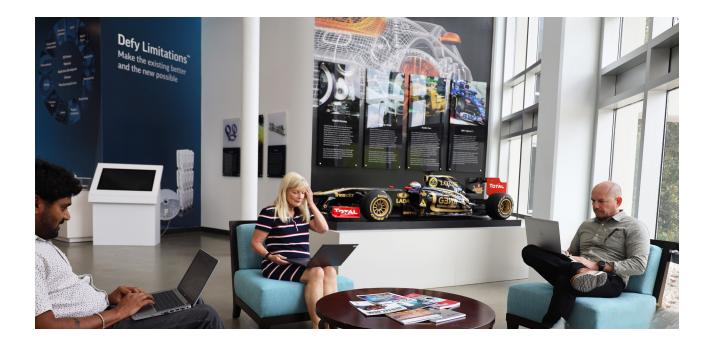
#### **Understand Impact for Your Business Area**

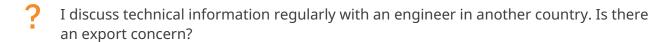
- Many business activities at 3D Systems are impacted by global trade laws and regulations, such as the following:
  - o Buying and selling products, software, and technology.
  - o Developing new products, software, and technology.
  - o Collaborating with employees in different countries.
  - Hiring and employing people in different countries.
  - Manufacturing, shipping, and distributing products, software, and technology internationally.
  - Receiving, creating, and sharing technical data or technology.

#### **Understand Restrictions**

- Understand that many trade embargoes and economic sanctions exist, as well as prohibitions on doing business with certain entities and/ or individuals.
- The global trade team is here to answer your questions on where you can or cannot do business or with whom.







Yes. Depending on the content of your communication, you may be sending or "exporting" technical data about a product, software, or technology or providing a service that is controlled under export laws and regulations. Providing service to a foreign person or the transmission of technical data to a foreign person may require prior authorization before you provide technical assistance or transmit the data. Contact the global trade team for guidance.

# **Key Highlights**



#### What is an Export?

Any tangible or intangible item that is sent from one country to another (or to a foreign person within your home country). An export may be different types of items (e.g., hardware, software, and technical information) or may occur using different methods of transportation (e.g., email, mail, air shipment, ocean shipment, etc.).



#### What is an Import?

Any tangible or intangible item brought into one country from another. An import may be different types of items (e.g., hardware, software, and technical information) or may occur using different methods of transportation (e.g., email, mail, air shipment, ocean shipment, etc.).

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the global trade team at <u>3DTradeCompliance@3dsystems.com</u>.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting</u> <u>options</u>.





# **Preventing Corruption**

#### **Our Commitment**

3D Systems is committed to the highest standards of ethical business conduct, and we take a firm stance against corruption and bribery. Corruption and bribery are illegal and are not tolerated.

3D Systems is subject to a variety of anti-corruption and anti-bribery laws across the globe, including the U.S. Foreign Corrupt Practices Act (FCPA).

The scope and applicability of the FCPA is broad, and the content of the FCPA and all applicable anti-corruption laws in the countries in which we do business must be observed at our locations worldwide.

Bribery means offering, promising, or gifting anything of value, cash or otherwise, to an employee, agent, or official of a government with the intent to improperly influence such individual. Something of value is considered a bribe if it is offered in exchange for obtaining or retaining business, gaining an unfair advantage, or causing someone to do something improper.

You cannot offer anything of value (directly or indirectly) with the intent to wrongfully influence a government official or someone in business. Doing so poses a serious legal threat to 3D Systems and you, including severe reputational risks and financial penalties.

In addition to prohibiting bribery, these laws require us to keep accurate books and records and maintain effective financial controls.

# **Key Policies**

- Anti-Corruption Policy
- Travel and Expense Policy

#### **Our Expectations**

#### **Understand What You Can and Cannot Do**

- Nothing should be done that may give an appearance of improperly influencing a government official, across all countries in which we operate.
- Actively participate in assigned training activities to understand our policies, your responsibilities, and the potential risks associated with non-compliance with anticorruption laws.

#### Be Cognizant of Gifts and Entertainment

- Remember that gifts and business courtesies on a modest scale are commonly used to strengthen working relationships among business associates.
- However, gifts and business courtesies cannot be used as a bribe, kickback, or otherwise to gain, or have the perception of gaining, any improper advantage or influence.

#### Ensure Accuracy in our Books and Records

- Keep detailed and complete books and records of your expenses to accurately represent the use of 3D Systems funds.
- For employees in finance related roles, do not mischaracterize, omit, or inaccurately place an entry into 3D Systems' books and records.
- Report any irregularities or suspicious transactions promptly.

#### Be Vigilant in Working with Government Officials

• Exercise care in determining whether the persons you are dealing with may be regarded as a government official because in some circumstances the law may regard them as one because the nature of the organization they work for. 3D Systems forbids bribing any government official in the United States or in any other country.







- I am a member of the service team and I have a long list of open cases. One customer offered me concert tickets if I could prioritize their case ahead of other open cases. Am I able to accept the tickets?
- No. This would constitute a kickback as the customer would be receiving an unfavorable advantage. Please review the Anti-Corruption Policy for more information.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the ethics and compliance team at <a href="mailto:compliance@3dsystems.com">compliance@3dsystems.com</a>.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting options</u>.

## **Key Highlights**

A bribe can be more than just a cash payment, it can be anything that the recipient would find valuable, beneficial, or useful. Examples include, but are not limited to:

- Providing expensive gifts or lavish entertainment to influence a decision-maker or gain favorable treatment.
- Secretly offering or accepting a payment or commission from a third party in exchange for awarding a contract or business opportunity.
- Offering or accepting job positions, internships, or other employment-related benefits to influence a decision or obtain preferential treatment.
- Paying for or accepting excessive travel expenses, luxury accommodations, or other travel-related benefits to influence a decision or secure a favorable outcome.
- Providing financial contributions, donations, or other support to political parties or candidates with the expectation of receiving preferential treatment or business advantages.





# **Managing Conflicts of Interest**

#### **Our Commitment**

As employees, we are expected to act in the best interests of 3D Systems. This means that business decisions should be made free from any conflicts of interest or the appearance of a conflict of interest. Conflicts of interest, actual or perceived, are prohibited, unless approved following full disclosure in accordance with our policies and practices.

Conflicts of interest can arise in many ways, such as in the form of personal relationships, outside work activities, and financial interests. By recognizing and appropriately navigating actual or potential conflicts of interest, you are doing your part in ensuring our business dealings are fair and ethical.

#### **Our Expectations**

#### **Prioritize Company Interests**

- Always act in the best interest of 3D Systems when making business decisions.
- Avoid situations where personal interests, relationships, or financial gain could compromise your objectivity.
- If you find yourself in a situation where a conflict of interest exists, recuse yourself from participating in any decisions or activities that could be influenced by the conflict.

#### **Disclose Potential Conflicts**

- If you identify a potential conflict of interest, it is important to promptly disclose it.
- As your professional and personal circumstances change, review and update your conflicts of interest disclosures accordingly.

#### Be Transparent

- Be open and transparent about your activities and relationships that could potentially lead to conflicts.
- As a manager, if you become aware of one of your employee's actual or perceived conflict
  of interest, promptly notify the ethics and compliance team at
   compliance@3dsystems.com.



- I want to do part-time work and start a new business in a related industry, but a co-worker said I need to have that reviewed and approved. This is my business, why does 3D Systems need to know?
- We need to be sure the part-time work or new business does not interfere with your work at 3D Systems or with our business interests. As a reminder, no 3D Systems time or resources may be used for the secondary job or new business.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the ethics and compliance team at <a href="mailto:compliance@3dsystems.com">compliance@3dsystems.com</a>.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting options</u>.

## **Key Highlights**

Illustrative examples of the types of conduct and situations that may constitute a conflict of interest include:

- Having a direct or indirect reporting relationship with a family member.
- Selling to a customer whose owner is a close family member.
- Serving as a director, officer, advisor, associate, or consultant of a for-profit or non-profit company, organization, or advisory board.
- Engaging in outside opportunities, like secondary employment.
- Giving or receiving a business gratuity or gift from a vendor that is inconsistent with our policy.
- Investing in a company that competes with 3D Systems.

# **Key Policies**

· Conflict of Interest Policy





# **Engaging with Third Parties and Suppliers**

#### **Our Commitment**

3D Systems follows legal, compliant, and ethical business practices and expects the same from suppliers, business partners, vendors, and other third parties we work with.

We recognize the value of third-party relationships for our Company therefore it is important we carefully select and manage our third-party relationships, establish clear expectations, and monitor performance to ensure the desired value is achieved.

It is our responsibility to consider who we enter a business partnership with, as their actions can directly impact our reputation as a Company and lead to serious consequences.

We must only do business with those who are committed to integrity and have business practices that are aligned to the principles in our Code of Conduct and the law.

# **Key Policies**

- Supplier Code of Conduct
- Conflict of Interest Policy
- Indirect Procurement Policy
- Indirect Procurement Purchase Requisition
- Conflict Minerals Policy

## **Our Expectations**

#### **Make Informed Decisions**

- If you are responsible for a supplier or business partner relationship for 3D Systems, carefully make informed decisions by understanding their business conduct practices.
- Ensure they are committed to compliance with applicable laws and regulations, will satisfy our contractual obligations, and will act in a way consistent with the principles of our 3D Systems Code of Conduct.

#### **Establish Clear Expectations**

- If you are responsible for a supplier or business partner relationship for 3D Systems, communicate the expectations of them to follow our Supplier Code of Conduct. These standards include expectations around business integrity and ethics, human rights and safety, and environmental compliance and ecological standards.
- Ensure suppliers and business partners cascade similar expectations to their supply chain through their own Supplier Code of Conduct.

#### **Act Responsibly and Build Trust**

- Practice and promote high professional standards in your working relationships with 3D Systems suppliers, business partners, vendors, and other third parties.
- Protect suppliers, business partners, vendors, and other third parties confidential and proprietary information, as we require them to protect ours as well.
- Always disclose potential conflicts of interest involving a potential supplier or other third party.

#### **Monitor Performance**

- Once a contract is in place, monitor the performance of our suppliers and business partners to ensure they are honoring commitments outlined in their contract.
- If you see or suspect any activity that could put 3D Systems at risk, report your concerns.





- One of our suppliers is under investigation for dishonest sourcing practices. Since it does not impact 3D Systems directly, do we need to take action?
- Yes. We expect everyone we work with to operate ethically. The practices of this supplier could affect our ability to serve the needs of our customers and subject us to reputational harm. You should report the matter immediately so we can respond appropriately.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the ethics and compliance team at <a href="mailto:compliance@3dsystems.com">compliance@3dsystems.com</a>.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting options</u>.

# **Key Highlights**

- Business Partners are entities or individuals with whom we collaborate to achieve shared business objectives, such as codeveloping products or leveraging complementary expertise.
- Resellers and Distributors are entities that are authorized to promote, sell, and service 3D Systems products to end customers in defined markets.
- Suppliers are entities or individuals that provide goods, materials, or services to us. They play a critical role in our supply chain by delivering necessary inputs that we use in production and to support operations.
- Vendors are entities or individuals that typically sell ready-to-use goods or services directly to us for resale, use in our operations, or to support our business functions.
- Contractors are individuals or companies hired to perform specific tasks under a contract. They are not employees but are engaged on a temporary or project-based basis to provide specialized skills or services.





# Meeting Government Contracting Standards

#### **Our Commitment**

We are committed to building open, honest, and fair relationships with all our third parties, including government agencies. Our business dealings with U.S. and other government entities around the world are subject to laws and regulations that are typically more stringent than those that apply to standard commercial transactions.

If you are involved in these types of business activities, you are expected to become familiar with the applicable governmental laws and regulations through our 3D Systems Government Contracting Compliance Policy and to act in accordance with them. Failure to comply with our policy can harm 3D Systems as well as employees involved. Those involved may be subject not only to disciplinary action by 3D Systems, but also to personal civil or criminal liability for failure to comply with applicable laws and regulations.

#### **Our Expectations**

#### **Partner Upfront with Legal**

• If you are engaged with a government for potential business, involve the legal team timely, upfront, and throughout the contract term to ensure the contracting process and government-specific laws and regulations are adhered to.

#### **Understand the Additional Laws and Regulations**

- When working with governments, understand the rules that apply to your work and follow the Government Contracting Compliance Policy.
- Follow other 3D Systems policies for additional compliance obligations that may exist, such as anti-corruption laws, export controls, labor standards, environmental laws, and more.
- Partner with the legal team to understand rights or restrictions of intellectual property developed under government contracts.
- Do not give, solicit, or receive anything of value to or from government officials.
- Securely store all government records and data in approved 3D Systems locations.



- You have had several meetings with a government contracting officer who you met as a result of 3D Systems' work with their federal agency. Can you offer to take the government official out to a professional basketball game?
- No. This could lead to a perception of favorable treatment, would be something of value that could influence the government official, and could raise the appearance of impropriety.

# **Key Highlights**

If you work with government contracts, please keep the following in mind:





Cost Allocation: Charge your time correctly and help ensure that all costs are recorded to the appropriate contract in line with contract terms.

**Billing and Invoicing:** Carefully review each invoice entry to verify that billing aligns with contract obligations and is fully compliant.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the legal team at <a href="legal.department@3dsystems.com">legal.department@3dsystems.com</a>.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting options</u>.

#### **Key Policies**

- Government Contracting Compliance Policy
- Anti-Corruption Policy





# **Preventing Money Laundering**

#### **Our Commitment**

Money laundering is the process used by criminals, terrorists, and others to move funds gained from illegal activity through legitimate businesses to make the funds appear legitimate.

Money laundering includes implementing illicit money into legitimate financial systems, disguising the source of the money through a series of multiple or unusual transactions, and making the illicit money available from legitimate accounts for legitimate purposes. Money laundering is illegal. We comply with anti-money laundering laws in all countries where we do business.

We conduct business carefully to help prevent money laundering and other financial crimes. Remaining alert, cautious, and inquisitive also helps protect 3D Systems, our Values, and the economy. We rely on you to monitor your business closely so we can take the necessary action to help prevent or report suspected financial crimes.

#### **Our Expectations**

#### Be Alert and Use Good Judgment

- Use good judgment and pay close attention when working with customers and third parties, especially if the transaction is unusual or inconsistent with their profile.
- Always know who is behind every transaction and only conduct business with reputable third parties engaged in legitimate business activities.

#### **Protect 3D Systems**

- Apply heightened scrutiny to transactions involving high-risk jurisdictions known for weak money laundering regulations, high levels of corruption, or involvement in illicit activities.
- If any transaction, by either a customer or business partner, seems suspicious, report your concerns immediately.



- I work in Accounts Receivable and one of our customers is requesting another entity to make a payment on behalf of their account. This seems to be unusual, who should I go to with this request?
- Yes. This could be a red flag for money laundering activities. Report your concerns to your manager or <a href="mailto:compliance@3dsystems.com">compliance@3dsystems.com</a>.

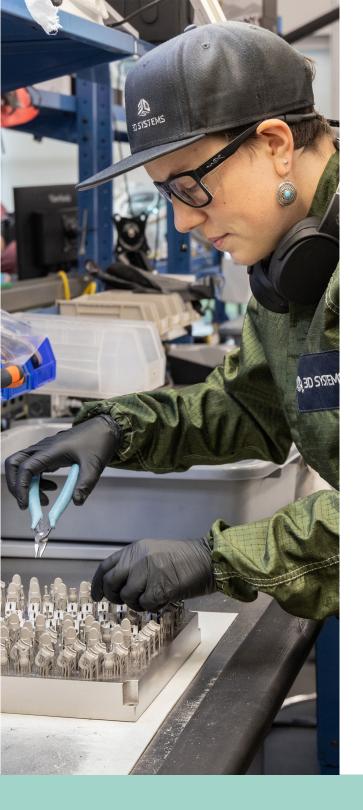
# **Key Highlights**

Examples of money laundering warning signs:

- A customer making several consecutive smaller payments on a large invoice.
- Unusual transaction patterns inconsistent with a customer's profile or typical business activities.
- Rapid movement of funds through multiple accounts, jurisdictions, or financial institutions without a clear business or legitimate purpose.
- Inability to explain the source of funds used in transactions.
- Transactions involving complex or convoluted webs of third-party relationships, such as multiple intermediaries.
  - Discrepancies or inconsistencies in invoices, contracts or other supporting documentation.

## **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the ethics and compliance team at <a href="mailto:compliance@3dsystems.com">compliance@3dsystems.com</a>.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting</u> <u>options.</u>



# **Avoiding Insider Trading**

#### **Our Commitment**

At 3D Systems, we adhere to laws and regulations related to insider trading and as documented in our Insider Trading Policy. It is illegal to purchase or sell 3D Systems stock, or securities of any other organization with which we have a relationship, based on material, non-public information.

You must never use material, non-public information about 3D Systems for personal gain, and must never give material, non-public information to others who may purchase or sell 3D Systems securities or the securities of other companies.

If you engage in insider trading, you could be subject to disciplinary action up to and including termination of employment and significant civil and criminal penalties. If you provide a 'tip' to someone who then buys or sells securities, both of you could be violating our Insider Trading Policy. You should trade securities only when information is lawfully and publicly available.

Review our policy and consult with our legal team to ensure you follow preclearance procedures, blackout periods, window periods, and other related requirements in compliance with insider trading laws.

# **Key Policies**

• Insider Trading Policy

## **Our Expectations**

#### **Maintain Confidentiality**

- Treat all material non-public information as confidential and refrain from discussing or disclosing it to individuals who do not have a legitimate business need to know.
- Do not discuss confidential information with family members, friends, or others outside of 3D Systems.
- Always be aware of your surroundings so that you do not inadvertently share information with anyone you should not.

#### **Understand How Your Role and Specific Time Periods Impact Compliance**

- Strictly adhere to trading windows and blackout periods, as applicable. These periods are typically implemented around significant corporate events to prevent the appearance of impropriety.
- Avoid trading when you possess material, non-public information, as doing as could raise concerns of insider trading.
- It is best to wait to trade until information has been properly disseminated to the public and there is a level playing field for all investors.
- Follow our preclearance procedures by seeking permission or obtaining clearance from the legal team before executing any trades of 3D Systems' securities.





- I am conducting due diligence for an organization that 3D Systems is considering acquiring, and the potential acquisition is still not public information. Can I buy shares of 3D Systems or the publicly traded stock of the acquisition target?
- No. Buying and selling Company stock with insider information could violate our Insider Trading Policy. Contact the legal team for guidance on insider trading.

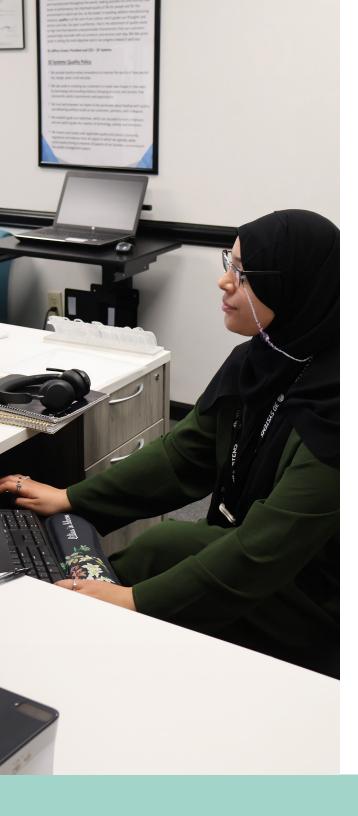
# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the legal team at <a href="legal.department@3dsystems.com">legal.department@3dsystems.com</a>.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting options</u>.

# **Key Highlights**

- Insider trading refers to the illegal practice of employees or other insiders trading stocks, securities, or other financial instruments based on material, nonpublic information about 3D Systems for personal benefit, or sharing information with others who then trade on it.
- Insiders are subject to additional trading restrictions and are typically individuals who have access to confidential information due to their position or relationship with 3D Systems, such as executive leaders, members of 3D Systems' Board of Directors, and employees who have access to material, nonpublic information due to their job responsibilities.
- Material Information is any information that could potentially impact the price or value of a security if it were known to the public, such as a Company restructuring, unannounced earnings, gain or loss of new contracts, changes in management, or possible acquisitions.
- Non-public information is information that is known within 3D Systems but has not been disseminated to the public.





# Regulating Charitable and Political Contributions

#### **Our Commitment**

We are committed to investing in the places where we live and work to create more resilient and vibrant communities for future generations. By serving the underserved to drive equity within the communities in which we live and work, we will strive to make a positive impact on society. We seek to support programs that align to our Company purpose, goals, and priorities through financial contributions, volunteering, and other outreach activities.

We encourage you to exercise your individual rights to be active in local and national politics. It is 3D Systems' policy to not use corporate funds for political contributions or political advocacy to influence political decisions, policies, or outcomes.

#### **Our Expectations**

#### Seek Guidance

- Ensure your charitable activities do not compromise your objectivity or negatively impact your professional responsibilities at 3D Systems, and do not present a conflict of interest.
- If you are considering becoming a candidate for political office or accepting an appointment to a government position, contact the legal team for guidance.

#### Act on Your Own Behalf

- We encourage you to become involved in your community. However, unless approved, do not make donations, or speak on behalf of 3D Systems.
- Be clear that you are acting on your own behalf and not on 3D Systems' behalf if you want to contribute your personal time or money to political activities. Do not use 3D Systems name to suggest that 3D Systems sponsors or endorses your personal politics, and do not use your position to pressure other employees to make political contributions or to support or oppose particular political candidates or causes.



- I have always been active in local politics, and recently I was approached about potentially running for office for a local governmental position. What do I need to consider?
- Ensure that your activities are based on your personal interests and do not interfere with your role at 3D Systems. For additional guidance on outside political activities while at 3D Systems, please contact the legal team.

# Key Highlights



Volunteer Your Time - As part of our 3D Gives Back Program, choose a charity or community service activity to get involved in! 3D Gives Back is a volunteer program where 3D Systems sites worldwide choose a charity or community service activity for collective volunteering.

This program empowers employees to select what suits them best, and all full-time and part-time employees are eligible to participate.

# **How To Ask Questions and Report Concerns**

- If you have questions, reach out to the legal team at <a href="legal.department@3dsystems.com">legal.department@3dsystems.com</a>.
- If you experience, see, or suspect behavior that may violate these commitments, report your concern through one of our <u>reporting options</u>.

#### **Key Policies**

Conflict of Interest Policy



# Waivers of the Code

In appropriate circumstances, the Chief Administrative Officer (or other authorized person) may grant a waiver of a provision of the Code. Waivers of the Code granted to any executive officer or director may be made only by the Company's Board of Directors or a Board committee and will be promptly disclosed as required by applicable SEC and NYSE regulations.

# **Closing Remarks**

3D Systems' legal, compliance, and ethical obligations and the situations we encounter go far beyond what is included in this Code. We must comply with both the letter and spirit of this Code, 3D Systems' policies, and the many global laws and regulations that affect our business. It is your responsibility to have familiarity with the principles of the laws that affect your job and to assist 3D Systems in complying with such laws. If questions arise about any matter of ethics or compliance, whether covered by this Code or not, or if you see something that seems inconsistent with 3D Systems Values, you should consult your manager, People and Culture Business Partner, the ethics and compliance team at <a href="mailto:compliance@3dsystems.com">compliance@3dsystems.com</a>, or anonymously contact 3D Systems' Open Line without fear of retaliation.

Our corporate policies are also a valuable resource for guidance on many compliance issues and must be followed. The responsibility for meeting these obligations cannot, however, be fully defined or guaranteed by any set of written rules. There will almost certainly be times when the best course of action can only be recognized by ensuring our actions are consistent with our Company Values and ethics. Driven by our passion for excellence in everything we do, we strive to achieve results the right way, according to the ethical principles in our Code and in a manner consistent with our values. In the end, our confidence must rest, as it always has, on the honesty, integrity, and good sense within each of us.