

Environment, Health, Safety and Sustainability Policy



EFFECTIVE DATE

July 10, 2023

REVIEWED ON DATE

July 22, 2024

SCOPE

Xerox Holdings Corporation and its subsidiaries globally.

SUMMARY

This policy establishes the commitment of Xerox Holdings Corporation to the environment, health, safety, and sustainability of its employees, customers, suppliers, and communities where we do business, including elements specific to Xerox workplaces, operations, and real estate and to Xerox products and materials, including those that are part of a service offering.

DEFINITIONS

EHS&S: Environment, Health, Safety & Sustainability organization

Xerox Standards: set of requirements and performance criteria for Xerox workplaces, products, and services in fulfillment of the corporate EHS policies. Standards are available internally.

Operating Units: all organizations and employees across the company globally.

Real Estate Transaction – a new occupancy, purchase, lease, renewal, change of use or termination, including those associated with mergers, acquisitions, divestitures and modification of facilities or property.

Product Related Incident - an event or condition that has or could have resulted in injury, illness, or property damage. Examples of incidents include machine fires, smoke generation, physical injury to an operator or service representative. Alleged events and product conditions are included in this definition.

Material - any chemical, compound, or consumable that is used, manufactured, sold and/or placed in a customer location by Xerox.

Product - Any hardware item developed or acquired for sale and/or placed in a customer location by Xerox or bearing the Xerox brand, including all packaging and peripherals.

POLICY

- Comply with applicable environment, health and safety laws, rules, regulations, and Xerox Standards.
- Take appropriate measures to protect the environment and health and safety of our employees, customers, suppliers, and neighbors from unacceptable risk.

Environment, Health, Safety and Sustainability Policy (continued)

- Take appropriate measures to prevent workplace injuries and illnesses; provide employees with a safe and healthy work environment.
- Proactively perform due diligence to identify, assess and mitigate environment, health, and safety impacts before starting a new activity or project, including in the design and acquisition of products/services, and mergers and acquisitions.
- Take appropriate measures to eliminate unacceptable risks from facilities, products, services, and processes.
- Strive for continual improvement of its environmental management system through prioritizing, setting objectives and targets, and implementing processes to conserve water and other natural resources, preserve biodiversity and prevent deforestation, eliminate the use of toxic and hazardous materials, prevent pollution, and recover, reuse, and recycle products and materials.
- Reach net zero greenhouse gas emissions.
- Strive for continual improvement of its safety management system through prioritizing, setting objectives and targets, and implementing processes and preventative programs to reduce the risk of injury, illness, fatality, and loss of assets.
- Exhibit leadership and innovation to address climate change by reducing the carbon footprint of our operations, distribution/logistics, products, and services.
- Aid employees, customers, suppliers, and partners in recognizing the impacts of their work activities on the environment and their role and responsibility in striving for more sustainable work practices.
- Require suppliers and contractors to adhere to applicable environment, health, and safety laws, rules, regulations, and Xerox Standards.

RESPONSIBILITIES

Operating Units shall:

- Comprehend and comply with environment, health and safety laws, rules, regulations, internationally recognized standards and codes and Xerox Standards that apply to their operations.
- Provide funding and resources to ensure that Xerox facilities/workplaces conform with applicable environment, health and safety laws, rules, regulations, internationally recognized standards, codes, and Xerox Standards and to remediate environmentally contaminated workplaces and real estate.
- Develop and maintain an emergency preparedness program.
- Strive for continual improvement of its safety management system and develop/implement preventative programs to reduce the risk of injury, illness, fatality, and loss of assets.

Environment, Health, Safety and Sustainability Policy (continued)

- Strive for continual improvement of its environmental management system through setting objectives and targets and implementing processes to conserve water and other natural resources, preserve biodiversity and prevent deforestation, eliminate the use of toxic and hazardous materials, prevent pollution, and recover, reuse, and recycle products and materials and manage environmental sustainability activities.
- Maintain any third party environmental and safety certification systems such as ISO 14001, OHSAS 18001, and ISO 45001.
- Inform EHS&S prior to interfacing or engaging governmental authorities or agencies responsible for environment, health and/or safety or when contacted directly by these agencies.
- Work with Global Real Estate & Facilities (GREF) to obtain EHS&S approval for any real estate transaction.

In addition, organizations engaging in product development or sourcing, or innovation shall:

- Develop and/or acquire Products and Materials that comply with applicable laws, rules, regulations, and Xerox Standards.
- Obtain EHS&S approval prior to finalizing a Material formulation, and Product design or acquisition.
- Ensure all Products and Materials are tested, and where appropriate, certified, or approved to applicable standards and regulations.
- Manage the environment, safety and health aspects of all Products and Materials throughout their life cycle.
- Notify EHS&S of a Product Related Incident; provide management and resources to resolve.
- Engage EHS&S to validate environmental sustainability claims or messages.

EHS&S shall:

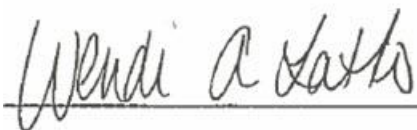
- Provide technical subject matter expertise and Xerox-specific knowledge/experience to enable the Operating Units to satisfy the requirements of this policy.
- Maintain environment, health and safety standards that comprehend the Xerox business model and reflect current and anticipated regulatory requirements and provide guidance to Operating Units to achieve compliance and approvals.
- Lead required risk assessments, involving applicable Operating Units and appropriate subject matter experts.
- Conduct environmental, health and safety audits.

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- Manage the remediation of all contaminated sites.
- Manage financial reserves according to Generally Accepted Accounting Principles (GAAP) or government agency requirements.
- In conjunction with Corporate Risk Management, develop insurance and property protection criteria to reduce the potential for property losses and maintain levels of protection acceptable to the Corporation.
- Establish corporate occupational exposure limits for chemicals and physical agents.
- Provide guidance on appropriate occupational health and wellness support services for Operating Units.
- Validate that all products and materials are tested, and where appropriate, certified, or approved to applicable standards and regulations.
- Work with Operating Units to resolve occupational health issues and Product Related Incidents.
- Review and validate environmental sustainability marketing claims.
- Interface with regulatory agencies, industry groups, governmental environment, health, and safety authorities, and other stakeholders on environment, health, safety, and sustainability topics on behalf of the Corporation.
- Monitor and report the progress of the corporation in satisfying the requirements of this policy.

Board of Directors shall:

- Review material environmental, health, and safety matters, including climate-related issues.
- Through its oversight of the Enterprise Risk Management process, review Xerox's assessment and management of climate-related risks.
- Be briefed on Corporate Social Responsibility related issues, including significant EHS&S topics, at least one time per year.



Vice President, Environment, Health, Safety and Sustainability