
Policy Letters

**Subject:**

Xerox Human Rights Policy

Number:

POL 007

Effective Date:

September 18, 2024

Supersedes:

POL 007

Dated:April 5, 2023

SCOPE

Xerox Corporation and its subsidiaries.

SUMMARY

Social and environmental responsibility is a long-standing Xerox corporate value. As part of this commitment, Xerox respects the human rights of all stakeholders, which include our customers, employees, business partners, and the communities where we operate. We are committed to the International Bill of Human Rights and guided by the human rights principles of the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. Our support for these principles is embedded in the Xerox Code of Conduct, in our position on labor relations, in our employment practices, in our relationships with suppliers, and in how we build our business in emerging markets.

The business operations of any company have the potential to affect the human rights of its stakeholders. Xerox is committed to conducting human rights due diligence to identify and prioritize those impacts and mitigate or eliminate the risk. Examples of such impacts include discrimination, violence, loss of the right freedom of expression and collective bargaining in workplaces; child/forced labor and human trafficking in the supply chain; and breaches of data privacy affecting our employees, customers and other stakeholders. Aligned with our dedication to inclusion, diversity and social justice, Xerox is committed to respecting the rights of vulnerable groups, including minoritized religious, political, racial, and ethnic communities; people with disabilities; migrant workers and refugees; women; children; Indigenous and First Nations peoples; LGBTQ+ communities; union members, human rights defenders; and others who are disproportionately exposed to adverse impacts or who have inequitable access to remedy.

We have well-defined policies in compliance with national, state, and local laws that we integrate into our corporate-wide standards and processes pertaining to labor, relationships with suppliers and growth in emerging markets. Where national and international human rights standards differ, we will seek to uphold the higher standard. We monitor our potential and actual impacts through our enterprise risk management program and provide access to grievance mechanisms and remedy where appropriate .

POLICY

Our commitment extends to all stakeholders across our business operations and value chain, with special regard for the rights of the most vulnerable.

Our Employees - People are at the core of a successful enterprise, and they deserve more than just a means to make a living. Our first priority is protecting the health and safety of our people, no matter where they live. We apply employee health and safety standards that meet and often exceed regulatory requirements. We believe in treating every employee with respect and dignity, providing a safe workplace that is free of discrimination and sexual harassment and allowing freedom of expression and providing fair, performance-based compensation. We provide opportunities for our employees to build rewarding careers and healthy, balanced lives.

Our Supply Chain and Distribution Channels - The productivity of our business model is increasingly dependent on working with partners and suppliers globally. While globalization increases our ability to compete more effectively in

Xerox Global Ethics Helpline: <https://www.xeroxethicshelpline.com> or 1-866-979-0001

Ethics & Policies MyXerox Page: <https://xerox.sharepoint.com/teams/Ethics>

Policy Letters



Subject:
Xerox Human Rights Policy

Number: POL 007

Effective Date: September 18, 2024

Supersedes: POL 007

Dated: April 5, 2023

the marketplace, it adds a heightened responsibility to ensure that these third parties act on behalf of Xerox in a manner consistent with our human rights ideals, respect for environment and ethical business practices. Xerox has adopted the Responsible Business Alliance (RBA) Code of Conduct on corporate social responsibility as its code of conduct for suppliers ("[Supplier Code of Conduct](#)"). The Supplier Code of Conduct includes labor standards based on recognized principles of international labor and human rights. As a member of the RBA, we join other companies to drive improvements in global supply chains. We assess our governance processes, suppliers' social and environmental performance and undertake capacity building with the intent of improving the well-being of workers and their communities. Xerox also participates in the Responsible Minerals Initiative (RMI) and leverages its tools and programs to advance responsible sourcing.

Our Customers – It is critical to our business to act with the highest standards of integrity and honesty at all times in delivering our services, products and solutions. We respect our customers' human and civil rights and seek to ensure their experience with us reflects our values. We strive to perform adequate due diligence to prevent or mitigate adverse human rights impacts associated with our business operations, using our leverage where appropriate. At Xerox, we manage compliance with applicable privacy and data protection laws through the implementation of a comprehensive global privacy program that spans the enterprise. Our privacy program monitors developments in privacy and data protection laws in the countries where we do business to ensure compliance with applicable requirements and reviews and updates our privacy policies and procedures for handling personal data on a rolling basis, as needed, to reflect the developments in applicable privacy and data protection obligations.

Our Communities - Respect for human rights extends into the communities where our employees work and live and where our brand is represented and visible. We respect laws, labor practices and customs in the countries where we operate, ensuring alignment with our standards and codes of conduct, many of which exceed the requirements dictated by laws and regulations. We strive to be a positive influence in our communities, demonstrating that respect for human rights fosters successful businesses and successful people, all of which help to nurture successful economies and develop stronger communities.

EXCEPTIONS

None

RESPONSIBILITIES

All Xerox employees are required to complete the Xerox Code of Business Conduct training and ethics acknowledgement on an annual basis. The training is designed to enhance an employee's ability to recognize and respond to ethical issues, communicate the process and expectations about reporting suspected violations of the Code, and give instructions for obtaining additional guidance should an employee have a question or concerns about Xerox ethics procedures.

Xerox Global Ethics Helpline: <https://www.xeroxethicshelpline.com> or 1-866-979-0001
Ethics & Policies MyXerox Page: <https://xerox.sharepoint.com/teams/Ethics>

Policy Letters



Subject:
Xerox Human Rights Policy

Number: POL 007

Effective Date: September 18, 2024

Supersedes: POL 007

Dated: April 5, 2023

Additionally, all Xerox Global Procurement employees are required to complete a Supply Chain Transparency Course annually. The training is designed to aid in the mitigation of human trafficking by building awareness of how human trafficking and slavery manifest themselves in the supply chain.

The Human Rights Working Group consists of individuals from Global Procurement, Human Resources, and Office of General Counsel. The Working Group is responsible for helping to ensure this Policy is being implemented effectively and achieving our goals; promoting internal awareness and understanding of the company's commitment to human rights; and responding to customer requests for information related to the Human Rights Compliance program. The Human Rights Working Group considers the effectiveness of the program, the nature of the risk environment, and evolving best practices. As appropriate, the Human Rights Working Group will recommend changes to this program. This team is led by Global Procurement/Supply Chain and includes senior representatives from Human Resources and the Office of General Counsel. The Human Rights Compliance Working Group at Human.Rights.Compliance.Working.Group@xerox.com.

GRIEVANCES AND REMEDIATION

Access to grievance channels and appropriate remediation are central to our commitment to upholding human rights. We provide a variety of channels for all affected stakeholders - including employees, business partners, local communities and customers - to report suspected human rights violations. These channels include the [Ethics Helpline](#), e-mail, Internet reporting, and both internal and external mail addresses. Any concerns can be reported anonymously and without fear of retaliation.

Each concern raised is investigated and treated in accordance with our Code of Business Conduct. Where adverse human rights impacts have occurred, Xerox will take appropriate corrective actions and provide remedy when necessary.

REFERENCES

Business Ethics Office Charter, Policy ETH 100

Office of Compliance Charter, Policy COM 001

[Anti-Slavery and Human Trafficking Statement](#)

Xerox Global Ethics Helpline: <https://www.xeroxethicshelpline.com> or 1-866-979-0001

Ethics & Policies MyXerox Page: <https://xerox.sharepoint.com/teams/Ethics>