

# Anti-Slavery and Human Trafficking Statement



## **A combined statement addressing the UK Modern Slavery Act and the California Transparency In Supply Chain Act**

This combined statement complies with both the California Transparency in Supply Chains Act of 2010 and the United Kingdom Modern Slavery Act of 2015 which require large retailers and manufacturers to disclose their efforts to eradicate slavery and human trafficking from their supply chain. Similarly the revised Federal Acquisition Regulation (FAR) 52.222-50 ("Combatting Trafficking in Person") is aimed at removing slavery and human trafficking from the US Federal Government contracting supply chain. In response this statement reflects Xerox's efforts to combat the conduct that precipitates such crimes in our supply chain. This statement provides both current and potential customers the ability to make well-informed choices about the products and services they purchase.

### **Xerox business and supply chain**

Xerox is a global provider of digital print technology and related solutions, operating in over 160 countries. We have a broad and diverse base of customers by both geography and industry ranging from small and medium sized businesses to graphic communications companies, governmental entities, education institutions and large enterprises. Our business spans three main offerings: Managed Document Services, help customers optimise their printing and related workflow and business processes, whilst Workplace Solutions and Graphic Communications products and solutions support the work processes of our customers by providing them with efficient, cost effective printing and communications infrastructure.

Xerox's supply chain operations are extensive and global, including sourcing technology for the production of Xerox printing products from production suppliers as well as products for resale or internal use from other product suppliers. Services are also procured from suppliers to support Xerox's customer services and internal business operations.

Xerox is committed to freely chosen employment which is embedded in our Code of Business Conduct, in our position on labour relations and in our employment practices. Xerox principles are guided by the United Nations Universal Declaration of Human Rights which prohibits slavery, servitude and the slave trade.

### **Supplier Relations and Controls**

To strengthen our approach to supplier-facing sustainability and human rights actions, Xerox started working with the Electronic Industry Citizenship Coalition (now known as the Responsible Business Alliance or RBA) in 2006 and became a member in 2008. The RBA holds its members accountable to a common code of conduct and as a RBA member, Xerox is committed to continuously improving the social, environmental and ethical responsibility of its supply chain. Xerox has adopted the RBA's Code of Conduct on corporate social responsibility as its code of conduct for suppliers ("Supplier Code of Conduct") and reinforces it annually in a letter to its suppliers. The Supplier Code of Conduct includes labor standards based on recognised principles of international labour and human rights. Freely chosen labour is a primary standard in the Supplier Code of Conduct, prohibiting forced, bonded or indentured labour.

# Anti-Slavery and Human Trafficking Statement



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The following highlight our efforts to eradicate slavery and human trafficking from our supply chain:

### Verification

Xerox takes several steps to verify, evaluate and address risks of slavery and human trafficking in our supply chain.

- Xerox first sets clear expectations for all of our suppliers who provide direct materials and engineering services as outlined in the Xerox Supplier Code of Conduct. For example, our supplier on-boarding documentation and contracts contain language in which suppliers must affirm their commitment to comply with all provisions of the Code.
- Xerox conducts initial risk assessments of its suppliers based on location, foreign worker population and other business and supply assurance and risk-based criteria.
- For suppliers identified in the initial risk assessment as high-risk, the supplier is either required to complete a Self-Assessment Questionnaire (SAQ) annually, or is audited by a Xerox internal auditor every 2 years, which requires the supplier to measure their compliance with the RBA's Code of Conduct. The supplier's responses to the SAQ allow Xerox to identify where possible risks in the supply chain exist. If major risks are identified in the SAQ, an announced audit of that supplier is conducted (as more fully described below). The SAQ step also serves to raise suppliers' awareness about the importance of social responsibility topics, clarify Xerox's expectations, target areas for review, and document suppliers' assessment of their performance.
- In addition to the initial risk assessment and SAQ, Xerox procurement professionals and quality assurance engineers routinely conduct on-site visits of suppliers as part of our ongoing supplier verification.

### Audit

- As indicated above, if major risks are identified in a SAQ, an announced audit of that supplier is conducted by Xerox. Xerox may also conduct an audit of any supplier identified in the initial risk assessment as high-risk, regardless of their results on the SAQ.
- During the audit process, areas of nonconformance are evaluated as risk, priority, major, or minor and are addressed through a corrective action process.
- All audits are on-site visits by trained Xerox employees and follow a consistent process. Xerox utilizes the RBA audit format to evaluate key critical sustainability areas, including but not limited to, labour practices, freedom of association, child labour, forced labour, human rights, recruitment fees, passport seizure and environmental concerns.

# Anti-Slavery and Human Trafficking Statement



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- Since 2010, Xerox has conducted over 365 SAQs and has audited over one hundred suppliers with more than 60% of them showing improvement on closure of corrective actions assigned during initial audits in the categories of labour, health & safety, environmental, ethics and management systems elements of their operations. In 2019, Xerox conducted 16 SAQs as well as 30 announced, on-site supplier audits which represented more than 53% of Xerox direct supplier spend.

### Certification

- Xerox requires all direct suppliers and critical indirect suppliers to represent and warrant their compliance with all applicable laws and regulations in Xerox agreements for the purchase of products. Similar representations are required by virtue of issuing Xerox purchase orders and other Xerox purchase documents.
- Xerox Global Procurement and Corporate Security screen all direct suppliers and significant indirect suppliers to ensure compliance with global anti-bribery laws and regulations, including but not limited to, the U.S. Foreign Corrupt Practices Act and U.K. Bribery Act. If a supplier is found to have violated applicable laws or contract terms and conditions, Xerox Global Procurement and Corporate Security review each situation on a case by case basis and determine the necessary course of action (i.e. terminate supplier relationship, instruct supplier to make corrective actions, etc.).
- If it comes to the attention of Xerox that a supplier has violated applicable laws or contract terms, Xerox will analyse each situation on a case by case basis and will determine the necessary course of action (for example, instruct the supplier to make corrective actions or terminate the supplier relationship).
- Critical direct and indirect suppliers are required to keep some or all of the following business documents on file while conducting business with Xerox:
  - All Xerox Purchase Orders and supplier invoices
  - Multi-National Master Purchase Agreement
  - Confidential Disclosure Agreement
  - Purchase Material Authorization
  - Business Resumption Plan
  - Product Safety and Certification Documents
  - Quality Plan and Quality Inspection Data
  - Restriction of Hazardous Substances (RoHS) compliance form
  - Tool Validation forms and records of the associated Xerox owned tool numbers
  - Responsible Business Alliance (RBA) Code of Conduct
  - Multi-National Survey Audit Reports
  - Conflict Mineral Templates

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## Internal Accountability

- Xerox has a Corporate Social Responsibility (CSR) Council which is comprised of several senior executives who are responsible for fostering a culture that promotes compliance and validating fair operating practices, environment, health & safety, labour, government affairs, reputation & brand, finance & real estate, philanthropy and supply chain & procurement. One senior executive member serves as the Executive Chair of the CSR Council and reports directly to the CEO and provides direction to the CSR Council.
- Xerox also has an Ethics and Compliance Program that is an integral part of its daily business operations and practices. To facilitate this commitment to integrity Xerox has:
  - A global, written [Code of Business Conduct](#) available in 19 languages
  - A supplemental [code of conduct for finance employees](#)
  - A specific code of [conduct for the Board of Directors](#)
  - A dedicated [Xerox Ethics Helpline](#) and a strictly enforced 'no retaliation policy' to promote comfort in using the Helpline
  - An Ethics & Compliance Governance Board comprised of senior executives representing all areas of Xerox business
  - Annual global communication of [business ethics policy](#) and CEO message on ethics and integrity
  - The Xerox Code of Business Conduct seeks to align employee actions and decisions with the company's core values and compliance requirements. Our position advocating for human rights and opposing human trafficking is codified in our Code of Business Conduct. All employee violations of the Code of Business Conduct are thoroughly reviewed and investigated on a case by case basis and each incident is treated seriously, fairly and consistently.
  - Xerox provides a variety of channels for employees, suppliers and customers to report suspected ethical violations, including phone, web, email and postal mail. The Ethics Helpline is available globally 24 hours a day, seven days a week in multiple languages, via toll-free telephone numbers ([www.xerox.com/ethics](http://www.xerox.com/ethics)) and our web reporting tool ([www.xeroxethicshelpline.com](http://www.xeroxethicshelpline.com)), which supports multiple languages.
  - Credible information regarding a potential violation of this anti-human trafficking policy, whether by a Xerox employee, subcontractor or agent, must be promptly reported to a manager, the Xerox Ethics Helpline or the Office of General Counsel. Employees aware of potential human trafficking violations also may contact the Global Human Trafficking Hotline directly at (US) 1-844- 888-3733 or [help@befree.org](mailto:help@befree.org) or Modern Slavery Helpline on (UK) 0800 0121 700. If in the UK a specific case of modern slavery is identified, it should be reported to the police immediately on 101. If potential victims are in immediate danger the standard 999 emergency number should be used. The Xerox Ethics and Compliance Program is overseen by the Audit Committee of the Board of Directors. The Ethics Office reports up to the Executive Vice President, General Counsel and Secretary via the Associate General Counsel and Chief Ethics

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Officer, with ongoing reporting responsibilities directly to the Audit Committee. The Executive Vice President, General Counsel and Secretary reports directly to the CEO.

### Training

- 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 recognise 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.
- 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.

For more information about social responsibility at Xerox, please visit the [Xerox Global Citizenship](#) site.

In accordance with the U.K. Modern Slavery Act 2015 and guidance thereunder, this 2019 statement on efforts to prevent Human Trafficking and Slavery in Our Business and Supply Chains was approved on 30 June 2020 by the directors of Xerox Limited, Xerox (UK) Limited and Xerox Finance Limited (as prior statements were in previous years in accordance with the Act) and has been signed by the undersigned directors for and on behalf of each of the above companies.

(Signature is required only by the Modern Slavery Act and not the California Transparency in Supply Chain Act.)

Signed

Signed

Signed

/s/ Daniel Benoit  
Director  
Xerox Limited

/s/ Anthony Arthurton  
Director  
Xerox (UK) Limited

/s/Anthony Arthurton  
Director  
Xerox Finance Limited

30 June 2020