

---

---

## Ethics

**Subject:**

Non-Retaliation Policy

**Number:**

ETH 200

**Effective Date:**

January 1, 2023

**Supersedes:**

ETH 200

**Dated:**June 10, 2020

---

---

**SCOPE**

Xerox Corporation and its subsidiaries.

**SUMMARY**

This policy prohibits retaliation against employees who in good faith raise or report ethics and compliance concerns, including violations of Xerox's Code of Business Conduct, Xerox policies, or any law or regulation.

**POLICY****Non-Retaliation**

Xerox prohibits retaliation against any employee who raises or makes a good faith report alleging a potential violation of Xerox's Code of Business Conduct, Xerox policies, or any law or regulation regardless of whether the report is determined to be founded or unfounded following an investigation. Retaliation in response to a good faith report will not be tolerated. Retaliation occurs when an employer takes an adverse action against an employee for reporting a concern or potential violation. Examples of adverse actions include but are not limited to: (i) termination, demotion or suspension; (ii) failing to hire, rehire, or consider for promotion; (iii) adversely impacting working conditions or otherwise denying any employment benefit; and (iv) creating a hostile or intimidating work environment. Anyone found to have retaliated against someone who has reported a potential violation in good faith is subject to disciplinary action, up to and including termination of employment.

**Good Faith Reporting**

Good faith reports are those made with a reasonable belief in the truth of the report. Anyone who makes a report in bad faith, such as when a report is made maliciously or with knowledge that the report is false, or who provides false or misleading information during an investigation, or otherwise acts in bad faith, is subject to disciplinary action. This policy does not insulate a reporting party from the consequences of his or her own misconduct and does not prevent Xerox from managing performance concerns and addressing conduct issues after a concern or potential violation is reported.

**Reporting a Concern or Potential Violation**

Xerox people who have a good faith belief that Xerox's Code of Business Conduct, Xerox policies, or any law or regulation have been violated have an affirmative duty to report the suspected violation to the [Xerox Ethics Helpline](#) or by calling 866-979-0001. Additional calling numbers available at [www.xerox.com/ethics](http://www.xerox.com/ethics). If you report a concern or violation, you are encouraged to provide accurate and complete information to permit a thorough investigation or response. Omissions or errors in the initial data reported (who/what/when/where) may cause a delay in the case intake process that may delay or negatively impact the case assignment and/or investigation process. All reports will be handled in a confidential manner, with disclosure limited as needed to conduct a full investigation of the alleged violation, to carry out appropriate disciplinary or corrective actions, or to meet legal requirements.

**REFERENCES**

[Xerox Code of Business Conduct](#)

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

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

---

---

## Ethics



**Subject:**  
Non-Retaliation Policy

**Number:** ETH 200  
**Effective Date:** January 1, 2023  
**Supersedes:** ETH 200  
**Dated:** June 10, 2020

---

---

HR 107.1: Open Door/ Internal Escalation Process  
HR 201.3: Equal Opportunity, Non-Discrimination, & Harassment

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

Form 54001 (08/2022) Administration

Page 2 of 2