



## Policy Letter No. 7

### Subject: Human Rights

Xerox Corporation and our affiliates and distributors do business in more than 160 countries. Our 130,000 employees work with customers, suppliers and partners in every corner of the globe. We are truly a global enterprise and with that comes the responsibility to behave responsibly as a corporate citizen in the smallest towns to the largest countries, with every employee engagement, every partner relationship and every customer touch point. We do this by running our global business with great respect for human rights. We are principally guided by the United Nations Universal Declaration of Human Rights. Our support for these principles is embedded in our codes 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. We inspect for compliance through our management processes including operations reviews, risk management and internal audit systems, and supplier assessments.

#### Our People

People are at the core of a successful enterprise, and they deserve much more than a way to make a living. Our first priority is the protection of the health and safety of our people, no matter where in the world they work. We apply employee health, safety and emergency preparedness standards that meet and often exceed regulatory requirements. We believe strongly that every employee should be treated with respect and dignity. That's why our employee code of conduct and human resources policies and practices reflect our firm commitment to providing a workplace that is safe, inclusive, and ethical. We provide fair performance-based compensation and offer opportunities for our people to build rewarding careers. The benefits and assistance we offer as an employer are aimed at helping our people have healthy, balanced lives. We support this commitment through well-defined policies and in compliance with rights and responsibilities provided for in local laws. Through our relationships with our people, we are guided by human rights principles established in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. These principles call for creating environments free from discrimination, prohibitions against child and forced labor, freedom of association and the right to engage in collective bargaining.

#### Our Customers

Xerox is mindful of doing business with customers who too are respectful of human rights. We have high standards for how we conduct our business around the world to ensure interactions with all customers are based on ethics and integrity. We do not let local norms rule our business but we respect local cultures. The values of our company and our codes of conduct guide our business operations and customer relationships. We comply with U.S. laws and regulations prohibiting commerce with certain countries, organizations and individuals.

Through the advancements of digital printing technology, our industry can be exposed to improper use like counterfeiting and black market sales of products and supplies. We cooperate with appropriate law enforcement officials to help ensure that Xerox technology and services are not used for illegal activity and that Xerox plays a leading role in ceasing illicit operations involving document management systems and supplies.

The company's risk management and internal audit organizations assess Xerox's business operations around the world, helping to ensure compliance of human rights principles for our business and with our customer relationships.

#### Our Supply Chain and Distribution Channels

The productivity of our business model is increasingly more dependent on working with partners and suppliers from around the world. While globalization increases our ability to compete more effectively in 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 the environment and ethical business practices.

Xerox has adopted the Electronic Industry Code of Conduct (EICC) to set standards for our vendors throughout our supply chain. The EICC is based on recognized standards and principles including the ILO and the Universal Declaration of Human Rights while maintaining a focus on our industry and applicable local laws and regulations. In addition to setting standards, our membership in EICC includes provisions for monitoring and auditing for compliance in our supply chain.

The company's high standards for human rights and sustainable business practices are manifested in supplier relationships not only in the manufacturing of Xerox products but also in the sourcing of paper and other supplies that carry the Xerox brand name. In addition, third parties that conduct business on our behalf by selling and servicing Xerox technology are expected to manage their businesses with high ethical standards and respect for human rights.

#### Our Communities

Corporate citizenship and human rights extend into the communities where Xerox people work and live and where our brand is represented and visible. We respect laws, labor practices and customs in the countries in which we operate, ensuring alignment with our high standards and codes of conduct, many of which exceed the requirements dictated by local laws and regulations. We serve to be a positive influence in 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. We are mindful of the people and environment affected by our business infrastructure. In developing our business around the world, we carefully evaluate each country in which we operate to protect our brand and reputation and to ensure that Xerox can operate successfully while maintaining our own standards of integrity and ethical business practices.



Ursula M. Burns  
Chairman of the Board of Directors and Chief Executive Officer

Date: May 20, 2010