

Matters Reported to the Xerox Ethics Office

At Xerox, we promote a culture where it is safe to speak-up, free from retaliation. We provide a variety of channels for employees, suppliers, and clients to report suspected ethical violations, including phone, web, email, and postal mail. For some cases, the Business Ethics Office provides guidance and takes immediate action; for others, including allegations of wrongdoing, an ethics investigation is required. When issues are brought to the attention of the Xerox Business Ethics Office that should be more appropriately handled by other functional processes, such as Human Resources or Corporate Security, the Ethics Office will refer the issue to the more appropriate process.

The Business Ethics Office tracks all cases from initial reporting to closure, case activity and trends, including the number of matters reported, case categories, outcomes and disciplinary action taken. Please see the charts below for some metric information relating to the matters received by the Xerox Ethics Office.

Matters Reported to the Ethics Office*	2019		2020		2021	
	Number	Percentage	Number	Percentage	Number	Percentage
Accounting and Financial Improprieties	23	9%	11	3%	6	2%
Business Integrity	49	19%	37	10%	37	11%
HR, Diversity and Workplace Respect	95	36%	107	28%	93	29%
Misuse, Misappropriation of Assets	8	3%	6	2%	15	5%
Safety and Security	17	6%	29	8%	48	15%
General Information	45	17%	160	42%	104	32%
Other	27	10%	30	8%	20	6%
Total Number of Matters	264	100%	380	100%	323	100%

* Category Definitions

Accounting and Financial Improprieties

Financial improprieties, improper accounting practices, and insider trading.

Business Integrity

Antitrust, bribery, conflict of interest, data privacy, confidential information, fraud, gifts, and regulatory compliance.

HR, Diversity and Workplace Respect

Discrimination, harassment, retaliation, compensation, leave of absence, work environment, and other HR-related matters.

Misuse, Misappropriation of Corporate Assets

Misuse of company information, issue on timekeeping, or inaccurate expense reporting and theft.

Safety and Security

Safety violations, unsafe acts or unsafe conditions, work-place violence/verbal abuse and potential substance abuse.

General Information

General information requests, rerouted customer inquiries, and external scams not involving Xerox employees.

Other

Product inquiry, policy inquiries, training/testing questions, duplicate reports, and all other matters.