

Subject: Xerox Human Rights Policy

Number: POL 007

Effective Date: January 1, 2019

Supersedes: Policy Letter No. 7

Dated: January 1, 2017

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. The Xerox Code of Conduct embeds our commitment to compliance, ethics, human rights, sustainability, privacy protection and community engagement into our daily operations.

The business operations of any company have the potential to affect the human rights of its stakeholders. Xerox is committed to identifying those impacts and mitigating or eliminating 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 customers.

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. We monitor our potential and actual impacts through our enterprise risk management program. We are committed to the Universal Declaration 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.

POLICY

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 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. 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.

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.

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EXCEPTIONS

None

RESPONSIBILITIES

As defined in Business Ethics & Compliance Office Charter, Policy ETH 100

FORMS/EXHIBITS

Any forms that are part of this policy or related process, exhibits that help illustrate concepts of the policies

REFERENCES

Business Ethics & Compliance Office Charter, Policy ETH 100

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