

# Anti-Modern Slavery Statement



## A statement addressing the UK Modern Slavery Act

This statement complies with 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 (“Combating 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

We have a broad and diverse base of customers by both geography and industry, ranging from small and mid-sized clients to printing production companies, governmental entities, educational institutions, and Fortune 1000 corporations. Our business spans four primary offering areas: Workplace Solutions, Production Solutions, Xerox Services, which includes Managed Print Services (MPS), and Xerox Financial Services. Xerox’s supply chain operations are extensive and global, including sourcing technology to produce 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. 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 minimizing the risk. Examples of such impacts include discrimination, violence, loss of the right to freedom of expression and collective bargaining in workplaces; child/forced labor and human trafficking in the supply chain.

Xerox is committed to freely chosen employment, which is embedded in our Code of Business Conduct, in our position on labor relations in our employment practices, and in our relationships with suppliers. Xerox principles are guided by the United Nations Universal Declaration of Human Rights and the International Labor Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work which prohibits forced or compulsory labor and child labor.

Xerox’s Human Rights Working Group is led by the Global Spend Management/Supply Chain team and includes senior representatives from Human Resources and the Office of General Counsel. The Working Group is responsible for helping to 1) minimize discrimination, violence, loss of the right to freedom of expression and collective bargaining in workplaces; child/forced labor and human trafficking in the supply chain; 2) promote internal awareness and understanding of the company’s commitment to human rights; and 3) respond to customer requests for information related to the Human Rights Compliance program. The Human Rights Working Group considers the effectiveness of the program, the nature of the risk environment, and evolving best practices. As appropriate, the Human Rights Working Group recommends changes to this program. The Human Rights Working Group regularly engages internal and external stakeholders to understand best practices and determine how we can continually improve this program. Additional information about Xerox policies related to human rights is available [on our website](#).

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### Supplier Relations and Controls

In general, the greatest potential risk of slavery and human trafficking can exist in supply chains. Xerox believes that the risk of slavery and human trafficking is mitigated by clearly established standards, oversight and quality controls within Xerox's sourcing process, social compliance verification process and business operations. 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. We are actively involved in advancing industry-wide responsible practices through our engagement in the RBA. We are dedicated to respecting the rights and promoting well-being of workers and communities engaged in the global electronics supply chain. 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 recognized principles of international labor and human rights. Freely chosen labor is a primary standard in the Supplier Code of Conduct, prohibiting forced, bonded or indentured labor.

Xerox participates in RBA's [Responsible Labor Initiative](#), a multi-stakeholder initiative focused on ensuring that the rights of workers vulnerable to forced labor in global supply chains are consistently respected and promoted. Xerox also participates in the [Responsible Minerals Initiative \(RMI\)](#) and leverages its tools and programs to advance responsible sourcing.

The following highlight our efforts to eradicate forced and compulsory labor and child labor 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 with all our suppliers who provide direct materials and engineering services as outlined in the Xerox Supplier Code of Conduct, which includes the prohibition against forced or compulsory labor and child labor. 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 Xerox Supplier Code of Conduct.
- Xerox spends approximately \$4.0 billion per year on suppliers to support our operations. We recognize an obligation to actively manage our global supplier base and ensure these critical partners meet our high social, environmental, and ethical standards. To ensure the Xerox Supplier Code of Conduct is being adhered to, Xerox has evaluated numerous audits submitted via the RBA Online portal in the last year. To drive continuous improvement with suppliers, Xerox has begun the process of engaging a third-party vendor to assist with creating coaching plans for long term success.

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- 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 those suppliers identified in the initial risk assessment as high-risk, the supplier is either required to complete an annual Self-Assessment Questionnaire (SAQ), or is audited every other year by Xerox, or through a third-party auditor contracted by Xerox, 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 significant 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.
- To remain abreast of the current initiatives and occurrences members of the Human Rights Working Group actively attend teleconferences, webinars, and other meetings to monitor risks associated with labor recruitment practices.
- 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, or a contracted third-party auditor. Xerox may also initiate an audit of any supplier identified in the initial risk assessment as high-risk, regardless of their results on the SAQ.
- Xerox's suppliers cover many geographic locations for both our direct and indirect services and products. For those countries and areas with higher inherent risks related to modern slavery, focusing on the lower-level suppliers can prove to be difficult when identifying and managing such risks. However, we actively continue to work with our direct suppliers to push down our required standards to address risks for modern slavery or human trafficking.
- During the audit process, areas of nonconformance are evaluated and classified based on risk level and priority and are remediated through a corrective action process.
- All audits are on-site visits by trained Xerox employees, or a contracted third-party, and follow a consistent process. The RBA audit format is used to evaluate key critical sustainability areas, including but not limited to, labor practices, freedom of association, child labor, forced labor, human rights, recruitment fees, passport seizure and environmental concerns.
- Since 2010, Xerox has conducted over 400 SAQs and has audited over one hundred suppliers evaluating key risk areas related to labor, health & safety, environmental, ethics. In 2023, nineteen of Xerox's major suppliers completed SAQ's. Sixteen suppliers were identified as low risk and three were identified as medium risk. There were no high-risk suppliers identified.

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- Xerox has implemented a robust due diligence process to ensure that the company sources minerals responsibly and to help address the human rights risks in our complex mineral supply chain. The Xerox Conflict Mineral team aligns to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas as well as the Responsible Labor Initiative (RLI). Details about this program including due diligence strategy, efforts to hold suppliers accountable, and results of our work can be found in our [Conflict Minerals Policy](#). Xerox files its [Form SD Specialized Disclosure Report and Conflict Minerals Report](#) with the SEC on an annual basis, as required by law.

## Certification

- Xerox requires all direct suppliers and critical indirect suppliers to represent and warrant their compliance with all applicable laws and regulations within Xerox product purchase agreements. Similar representations are required by virtue of issuing Xerox purchase orders and other Xerox purchase documents.
- Xerox Global Spend Management 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 Spend Management 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.).
- To ensure full compliance, critical direct and indirect suppliers are required to keep 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

## Internal Accountability

- Xerox has a Corporate Social Responsibility (CSR) Council, which includes our CEO, senior executives, and CSR leaders, focused on centralized oversight of the corporation's management approach, including policies, goals, strategies, and actions to drive progress. Each council member is supported by individuals who have expertise and experience in the various CSR topic areas. An individual from the Executive Committee of the CEO chairs the Council to provide direction and guidance. The primary mission of the CSR Council is to drive strategies with a client-

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centric impact across Xerox and ensure that we implement a comprehensive CSR strategy, which includes issues related to fair operating practices, environment, health & safety, labor, government affairs, reputation & brand, finance & real estate, philanthropy and supply chain.

- 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 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 sets forth the framework of how we do business at Xerox by setting forth standards of integrity and compliance. It is designed to deter wrongdoing and promote honest and ethical conduct. Our position advocating for human rights and opposing human trafficking is codified in our Code of Business Conduct.
  - Xerox provides a variety of channels for employees, suppliers and customers to report suspected ethical violations, including phone, internet, email and postal mail and has a strong non-retaliation policy. 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 internet reporting tool (<https://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) 1-888-373-7888 or [help@humantraffickinghotline.org](mailto:help@humantraffickinghotline.org) or Modern Slavery Helpline on (UK) 0800 0121 700. If a specific case of modern slavery is identified in the UK, 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.
  - All reports of violations of the Code of Business Conduct, Xerox policy and laws/regulations are triaged and addressed in accordance with Xerox policy. Xerox is committed to conducting full and thorough investigations into reports of misconduct and taking appropriate and consistent corrective action and disciplinary action for substantiated violations.
  - The Xerox Ethics and Compliance Program is overseen by the Audit Committee of the Board of Directors. The Ethics Office is overseen by the Executive Vice President, General Counsel, Corporate Secretary and Chief Ethics Officer, with ongoing reporting responsibilities directly to the Audit Committee. The Executive

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Vice President, General Counsel, Corporate Secretary and Chief Ethics Officer reports directly to the Chief Executive Officer of Xerox Holdings Corporation.

### Training

- All Xerox employees are required to annually complete Xerox Code of Business Conduct training and complete an ethics acknowledgement on an annual basis. The training is designed to enhance an employee's ability to recognize and respond to ethical issues, communicate the process and expectations about reporting suspected violations of the Code of Conduct, and give instructions for obtaining additional guidance should an employee have a question or concerns about Xerox ethics procedures.
- Additionally, all Xerox Global Spend Management 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 2023 statement on efforts to prevent modern slavery in our business and supply chains was approved on 25 June 2024 by the directors of Xerox Limited, Xerox (UK) Limited and Xerox Finance Limited, in accordance with the Act) and has been signed by the undersigned directors for and on behalf of each of the above companies.

Signed

/s/ Richard Pitceathly  
Director  
Xerox Limited

Signed

/s/ Darren Cassidy  
Director  
Xerox (UK) Limited

Signed

/s/ Jacques-Edouard Gueden  
Director  
Xerox Finance Limited

June 2024

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To view our 2022 – 2023 Anti-Slavery and Human Trafficking Statement, please visit [https://www.xerox.com/downloads/gbr/en/u/UK\\_Modern\\_Slavery\\_Act\\_Transparency\\_Statement\\_2023.pdf](https://www.xerox.com/downloads/gbr/en/u/UK_Modern_Slavery_Act_Transparency_Statement_2023.pdf)