Maintaining a Safe Work Environment

Employee Safety
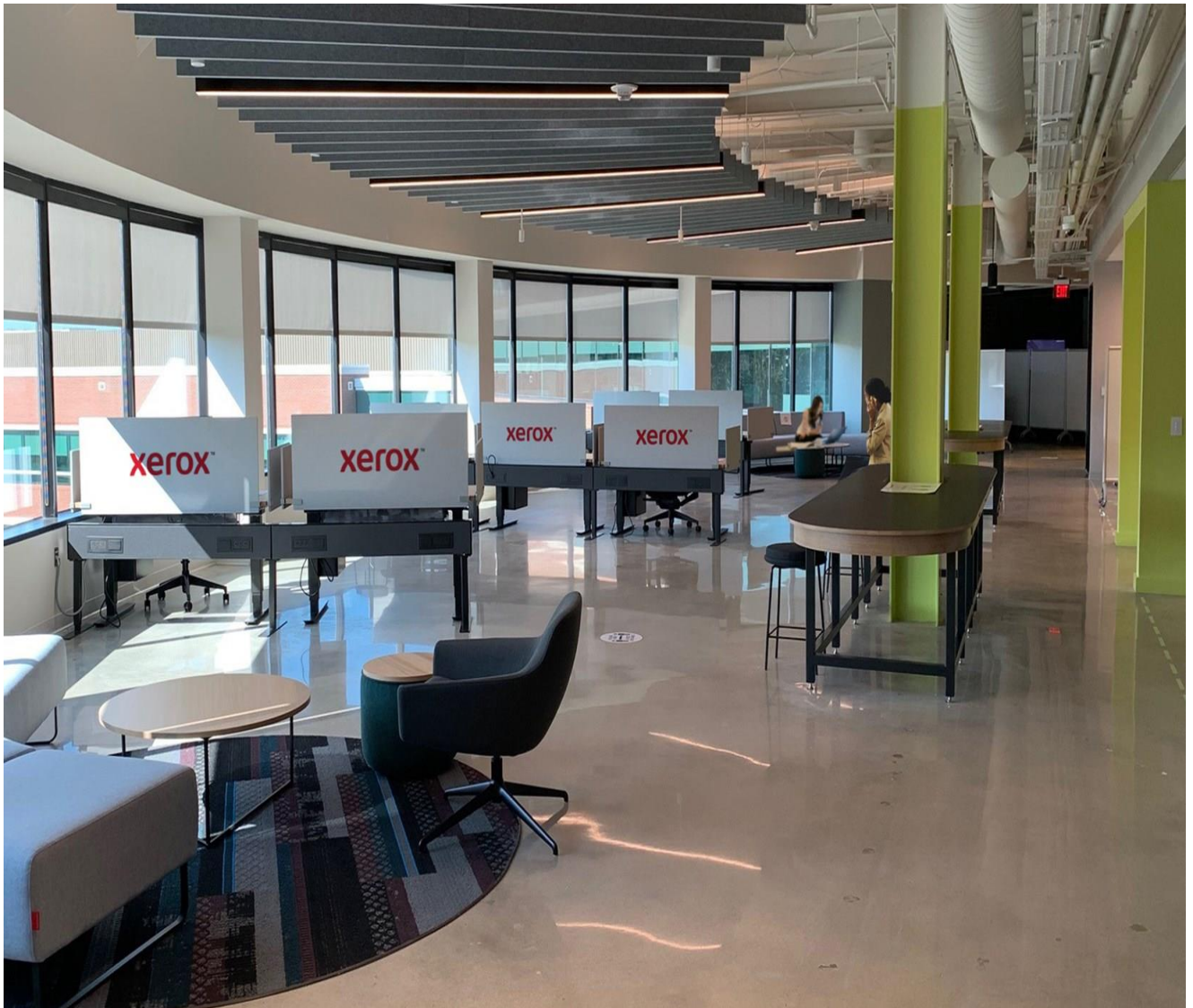
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Safety Performance

We are committed to maintaining a safe work environment for our people. With a global incident reporting process in place, we track and monitor safety performance.

This, in combination with workplace safety inspections and hazard analysis, ensures we can focus our improvement efforts on areas where we can have the greatest impact to prevent incidents where our employees and others are at the most risk. Workplace accidents and near misses are investigated, and trends related to the root causes are closely and carefully monitored. Employee safety communications take a variety of forms, given the great diversity in our operations and workplaces.

To educate and keep our employees safe, we provide:

- site-specific hazard management,
- off-the-job safety information, and
- communications regarding unique safety concerns for all locations.

For more information about our safety performance and compliance, see our CSR Progress Summary

Safe Facilities

To meet stringent fire and life safety requirements at all Xerox-owned and leased locations, the Environment, Health, and Safety team reviews all real estate transactions. These requirements have been established and implemented worldwide, regardless of location, size of the facility, or occupancy classification. The focus of our safety review is on life safety requirements, including safe egress in an emergency, fire and incident prevention, early detection, suppression, occupant notification, and prompt emergency response. These reviews also ensure that building-specific emergency plans are implemented and updated and that emergency drills are completed at least annually.

Asset Protection and Fire Safety

The Xerox Asset Protection and Fire Safety Program provides fire-safe workplaces and limits potential losses to company equipment and property from fire, explosions, and natural hazards such as windstorms, snow-loading collapse, and floods. The program includes periodic inspections and mitigation planning for all unacceptable risks. Review meetings of audited locations are regularly conducted with our corporate risk management team and our loss control engineering supplier to establish strategies that reduce the risk of losses. Our philosophy is to consistently hold our higher-value locations to a "Highly Protected Risk" standard. In addition, the locations are reviewed for conformance to Xerox standards and recognized fire, property, and life safety standards. We continue to demonstrate excellent loss control performance and benefit from favorable insurance rates and premiums.

Contractor Safety Process

The Contractor Safety Program at Xerox aims to ensure that contracted work conforms to all applicable regulations and company environment, health, and safety (EHS) requirements. Contractors are qualified to meet the safety and health requirements before beginning work at a Xerox location. Based on the complexity and potential safety hazards of the contracted work, contractors must submit a job safety plan. All workers at U.S. Xerox sites must attend a safety orientation session and complete the Occupational Safety and Health Administration's (OSHA) 10-hour safety course when appropriate to the job function. Incidents and injuries are tracked both as feedback to the contractor and to measure program effectiveness. First established in our Webster, N.Y. operations, this model has been applied successfully in many of our larger locations. We also function as a contractor for many client accounts. At these sites, we follow our internal safety standards, establish worker protection plans, deliver specific employee training, and maintain management oversight to ensure that our operations meet both Xerox and client requirements.

Environment, Health, and Safety (EH&S) Project Reviews

We continually modify our facilities, work processes, and operations to improve safety, efficiency, and effectiveness. To ensure these changes meet our applicable safety standards, regulatory requirements, and good management practices, occupational safety, and health professionals review projects. The scope of the project is defined, potential safety and environmental impacts are characterized, and control requirements are established and communicated before the project is initiated. The process informs the engineering and management teams of safety requirements and ensures that all project designs have controls integrated into the work plans.

This process also ensures environmental, health, and safety requirements are understood and implemented at the beginning of each project. Examples include capital improvements to facilities, manufacturing, and R&D areas. In addition, the health and safety hazards of new product technologies undergoing R&D are assessed. Recommendations are made on the design and implementation of controls to ensure employee safety (e.g., laser safety of medium- and high-powered lasers, local exhaust ventilation systems, and personal protective equipment)

Corporate EH&S Compliance Audit Program

A well-established internal audit program measures our success in implementing corporate standards, allows us to share best practices, validates regulatory compliance, and evaluates risk management processes. Corporate assessments at significant locations are conducted once every three to five years based on the inherent risks associated with site operations. These risks are re-evaluated on a regular basis and include site size and type of operation, specific EH&S regulatory applicability, and employee turnover.

Xerox audit teams evaluate operations against our internal standards, external regulations, and industry guidelines. When necessary, we also focus on a particular EH&S aspect based on technologies with unique hazards and evaluate management system performance. With the assistance of local managers and support staff, action plans are developed, and deficiencies are corrected.

Senior management is included on all final reports and/or corrective action plans resulting from the assessment, enabling immediate attention to issues with the potential to pose a significant risk of environmental damage, serious injury to employees, or regulatory noncompliance. The audit program of Xerox is an important mechanism for identifying and correcting performance gaps.

EH&S Employee Training

Beginning with our new hire orientation, employees are made aware of the environmental, health, and safety requirements relevant to all Xerox workers. As appropriate, employees receive training on topics such as hazard communication, hazardous waste management, spill prevention and response, recycling, ISO 14001, and various other topics. In addition to any regulatory-required safety topics, employees are trained in established safe job procedures based upon the job-specific hazards they may encounter and procedures and protective equipment they are expected to use.

Our EH&S policy is posted in our facilities and on our internal website. We utilize a variety of processes to deploy environment, health, and safety goals to all our operations, including integration into the product development process and services deployment process. Through our ISO 14001 environmental management system, employees are routinely involved in identifying the environmental aspects associated with their responsibilities.

A comprehensive company-wide safety training program is tailored to the specific situations our employees commonly encounter. Recognizing the unique hazards faced by our US-based technicians, who spend significant time driving, specialized driver safety modules have been implemented specifically for them.

Emergency Preparedness

Because emergencies and disasters often strike without warning, we have established an emergency preparedness and response program to help protect the safety of our employees, surrounding communities, and the environment.

To prepare for emergencies, we have implemented site-specific Emergency Action Plans in our facilities, globally, to assist with the execution of appropriate actions in response to local emergencies. Our plans account for common emergencies such as fires, weather-related emergencies such as tornadoes and hurricanes, and location-specific emergencies such as earthquakes and radiological emergencies. These plans also include shelter-in-place procedures to protect our employees from emergency situations that occur outside of our facilities, which may include environmental issues, social unrest, or other threats.

We also include resources and procedures for first aid medical response in the event of an injury to or illness of an employee in our facilities. For on-site medical emergencies, we have Medical Emergency Response Teams (MERTs). These MERT employees are provided with the training and equipment necessary to render a quick response to stabilize the emergency until more advanced medical support arrives.

In addition to emergency action plans established at the local operation level, there are preparedness plans at the corporate level, including major incident response, crisis management, and pandemic preparedness. These plans are designed with a central corporate strategy that utilizes an incident command structure. Incident response managers are responsible for local/regional tactical and emergency response, coordinating efforts at their respective locations with the Corporate Crisis Management Team, and dealing with local business operations issues. Response coordination and integration are a part of the planning process.

All preparedness plans are routinely tested for effectiveness through management reviews, corporate audits, and annual drills. Any discrepancies are noted, and corrective actions are implemented. Following an emergency, business resumption plans are implemented to ensure that operations are quickly restored.

Preventing and Monitoring Workplace Exposure

To protect Xerox employees from unsafe exposure to chemicals, noise, and radiation, we apply exposure limits to worldwide manufacturing, research, and technology service operations based on the threshold limit values (TLV) recommended by the American Conference of Governmental Industrial Hygienists. These reflect the best advice of a widely respected committee of international experts. However, in jurisdictions where government regulations are more stringent, Xerox meets those regulatory requirements. For some materials, including toners, certain solvents, and metals, we have established exposure limits that are more stringent than the TLV or existing regulations and standards.

Using the Xerox Exposure Assessment process, industrial hygienists, and safety professionals monitor, assess, and report workplace exposure. Effective process design, engineering controls, safe job procedures, and personal protective equipment are utilized to control exposure and protect employee health.

Medical surveillance programs are in place to monitor the health of employees working in operations with specific jobs and hazards (e.g., high noise, organic solvents). Healthcare professionals review the results of those medical exams to ensure employee health.

Ergonomics

Musculoskeletal disorders represent a significant portion of our work-related injuries, and we work to minimize the risk factors as a job is designed. We also study exposure to ergonomic hazards and raise awareness with employees so that they can make improvements to their workstations.

From manufacturing operations to office work, we continue to study the causes and potential remedies for workplace injuries:

- Manufacturing operations: Each operating unit is required to complete an "Action Limit Checklist" for all jobs. This checklist helps identify areas of ergonomic risk and prioritize necessary changes/modifications. All employees must have basic ergonomic training that includes identifying risk factors, common injuries related to poor setup, and simple strategies for improvement.
- Machine service: We have studied Xerox Technical Service Representatives' (TSRs') exposure to ergonomic hazards. The findings have helped Xerox select tools and develop procedures to mitigate the risk of musculoskeletal disorders. When designing new equipment, evaluations are done to assess risks for our TSRs. The best time to make a modification is when a product is still in the design or in an early test phase.
- Office ergonomics: Our largest employee population is office-based. Raising awareness to help employees make effective workstation changes is critical to minimizing risk for our employees. We have created computer-based training on ergonomic principles and practices to enable employees to go through the required training programs at a time that minimizes business interruptions. Recent employee requests highlight the increase in employees working remotely. Since many Xerox employees work a hybrid schedule, the Xerox ergonomics team developed simple, practical instructions on modifying common home areas into computer-based workstations to ensure a smooth transition.

Motor Vehicle Safety

Motor vehicle safety is a key part of Xerox's safety initiatives. Our company car program includes motor vehicle safety requirements for our drivers and accident prevention and reporting process. Employee driving records are reviewed regularly, and remedial motor vehicle safety training is provided to improve awareness and competency. The management team tracks motor vehicle accidents by frequency and type and reports those incidents through the proper channels.

We also conduct comprehensive safety reviews of all vehicle models before a car is accepted into our fleet. We review safety ratings, including crash test results and require safety features such as daytime running lights and safety barriers between the driver's seat and storage areas. Fleet drivers are asked to provide feedback about existing Xerox vehicles to help make better-informed selections around future purchases.