GRI Index



STATEMENT OF USE

Xerox has reported the information cited in this GRI Content Index for the period January 1, 2023, through December 31, 2023, with reference to the GRI Standards: GRI 2021 Content Index (GRI 1: Foundation 2021).

Disclosure	Response
GRI 2: General Disclosures	
2-1 Organizational details	Xerox Holdings Corporation or Xerox Corporation is a publicly held company at 201 Merritt 7, Norwalk, CT 06851-1056. Countries of operation: see Annual Report, p. 1, Business
2-2 Entities included in the organization's sustainability reporting	This report covers all operations of Xerox Holdings Corporation and its subsidiaries included within the Xerox 10-K, Exhibit 21
2-3 Reporting period, frequency, and contact point	Our CSR Report is published annually. The 2024 report covers data from January 1, 2023-January 1, 2024. The CSR report was released in September 2024. For questions, contact Victoria.DeYoung@xerox.com
2-4 Restatements of information	Progress Summary, Carbon & Energy accounting, footnote p. 10
	 Progress Summary, Global workforce by age group and gender 2022, footnote p. 15
	Progress Summary, 2022 % union population for Portugal, footnote p. 15
	Progress Summary, Xerox employee volunteer time rate, footnote p. 17
2-5 External assurance	CSR Report, p. 86, Reporting for Transparency
2-6 Activities, value chain, and other business relationships	2023 Xerox 10-K, pp. 1-3 Business
	CSR Report, pp. 79-84
2-7 Employees	Progress Summary, pp. 12-15
2-8 Workers who are not employees	CSR Report, pp. 76-77
2-9 Governance structure and	CSR Report, pp. 68-69
composition	Proxy Statement, pp. 16-18, Corporate Governance at Xerox
2-10 Nomination and selection of the highest governance body	Proxy Statement, pp. 4-5, 18-19
2-11 Chair of the highest governance body	Proxy Statement, p. 7, The Chair is not a senior executive of the company.

Disclosure	Response
GRI General Disclosures, continued	
2-12 Role of the highest governance body in overseeing the management of impacts	CSR Report, pp. 68-69
2-13 Delegation of responsibility for managing impacts	CSR Report, p. 69
2-14 Role of the highest governance body in sustainability reporting	CSR Report, pp. 68-69
2-15 Conflicts of interest	Proxy Statement, pp. 21,48,110
2-16 Communication of critical concerns	At Xerox, we bring critical concerns during scheduled and or special board meetings. However, we can contact the Board at any time by email or phone to address critical concerns. We do not report the total number or nature due to confidentiality.
2-17 Collective knowledge of the highest governance body	During multiple sessions throughout the year the board is updated on the current state of sustainability.
2-18 Evaluation of the performance of the highest governance body	The Corporate Committee reviews the annual self-assessment survey the Board takes. This does not include evaluating itself in overseeing the management of the company's impact on the environment or people.
2-19 Remuneration policies	Proxy Statement, pp.40-48, 55, 60, 70
2-20 Process to determine remuneration	Proxy Statement, pp. 28-76, Our Executive Compensation Guiding Principles
2-22 Statement on sustainable development strategy	CSR Report, Letter from the CEO, p. 70 Progress Summary
2-23 Policy commitments	Xerox Code of Business Conduct EH&S Policy Xerox and Human Rights Xerox Policy Letter on Human Rights
2-24 Embedding policy commitments	Corporate Officers are the most senior level with oversight of, or accountability for, the implementation of the policy commitments. The Audit Committee of the Board of Directors oversees our Ethics and Compliance program, and the Xerox's Ethics Office has the day-to-day responsibility for implementing the Ethics Program of Xerox, including the policy commitments regarding reporting of ethics and compliance allegations. Each organization integrates its policies into its operations through its unique policies and procedures.

Disclosure	Response
GRI General Disclosures, continued	
2-24 Embedding policy commitments, continued	Implementation of commitment with and through business relationships occurs via contractual clauses and via training of those who work on behalf of Xerox. Xerox monitors compliance with the policy commitments throughout its activities (across functions and geographic locations) and throughout its business relationships via risk assessments, enterprise risk assessments, and an Internal Audit by Xerox. Xerox considers compliance with contractual requirements when making sourcing decisions. Training includes Xerox Code of Business Conduct and Harassment Prevention training.
2-25 Processes to remediate negative impacts	CSR Report, pp. 32, 65
2-26 Mechanisms for seeking advice and raising concerns	We provide a variety of channels for employees, suppliers, and customers to receive guidance regarding ethics and compliance issues and to report suspected ethical violations. These channels include the Ethics Helpline, e-mail, Internet reporting, and both internal and external mail addresses. See Xerox Code of Business Conduct, p. 6, for additional information re: obtaining guidance and reporting concerns.
2-27 Compliance with laws and regulations	CSR Report, pp. 71-75 In 2023, there were no significant instances of non-compliance with laws and regulations.
2-28 Membership associations	CSR Report, p. 78, Affiliations
2-29 Approach to stakeholder engagement	CSR Report, pp. 76-81
2-30 Collective bargaining agreements	 Progress Summary, pp. 14-15, For employees not covered by collective bargaining agreements, working conditions are based on their country's laws. CSR Report, p. 51
GRI 3: Material Topics 2021	
3-1 Process to determine material topics	CSR Report, p. 70, Materiality at Xerox
3-2 List of material topics	CSR Report, p. 70
3-3 Management of material topics	 Climate Change: CSR Report, pp. 23-26 Supply Chain Procurement, Diversity and Due Diligence: CSR Report, pp. 60-65

Disclosure	Response
GRI 204: Procurement Practices	
204-1 Proportion of spending on local suppliers	CSR Report, pp. 60-63
GRI 302: Energy	
302-1 Energy consumption within the organization	Progress Summary, pp. 6-7CSR Report, pp. 23-26
302-3 Energy intensity	2024 CDP Report
302-4 Reduction of energy consumption	2024 CDP ReportProgress Summary, p. 6
302-5 Reductions in energy requirements of products and services	2024 CDP Report CSR Report, pp. 12-16, 19-21
GRI 305: Emissions	
305-1 Direct (Scope 1) GHG emissions	Progress Summary, p. 5CSR Report, p. 252024 CDP Report
305-2 Energy indirect (Scope 2) GHG emissions	Progress Summary, p. 5CSR Report, p. 252024 CDP Report
305-3 Other indirect (Scope 3) GHG emissions	Progress Summary, pp. 5-6CSR Report, p. 262024 CDP Report
305-4 GHG emissions intensity	2024 CDP Report
305-5 Reduction of GHG emissions	Progress Summary, pp. 4-6CSR Report, p. 252024 CDP Report
305-6 Emission of ozone-depleting substances (ODS)	CSR Report, p. 29
305-7 Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	Progress Summary, p. 9

Disclosure	Response	
GRI 308: Supplier Environmental Assessment		
308-1 New suppliers that were screened using environmental criteria	Progress Summary, p. 18	
308-2 Negative environmental impacts in the supply chain and actions taken	Progress Summary, p. 18	
GRI 401: Employment		
401-1 New employee hires and employee turnover	Progress Summary, p. 18	
GRI 404: Training and education		
404-2 Programs for upgrading employee skills and transition assistance programs	CSR Report, pp. 48-49	
404-3 Percentage of employees receiving regular performance and career development reviews	CSR Report, p. 48 The intent is for all employees (100%) to complete a performance review, which is a 3-part process (creation of goals/interim reviews/YE feedback). In 2023, an enhanced performance review program was launched to incorporate career development goals/discussion.	
GRI 414: Supplier Social Assessment		
414-1 New suppliers that were screened using social criteria	Progress Summary, p. 18	
414-2 Negative social impacts in the supply chain and actions taken	Progress Summary, p. 18	
GRI 418: Customer Privacy		
418-1 Substantiated complaints concerning breached of customer privacy and loses of customer data	CSR Report, pp. 57-59	

