



Title: **Human Rights Policy Statement**

Policy No.: **HR 5-4**

Department: Human Resources

Supersedes: None

Date: January 11, 2021

Authorization: Chief Administrative Officer

Respect for Human Rights

Respect for human rights is a fundamental value of R.R. Donnelley & Sons Company (“RRD” or the “Company”). This Human Rights Policy formalizes RRD’s longstanding commitment to protect, uphold, and respect human rights for all people in accordance with and guided by international standards, including the UN Guiding Principles on Business and Human Rights, the ILO’s 1998 Declaration on Fundamental Principles and the UN Universal Declaration of Human Rights.

Business can only flourish in societies where human rights are protected and respected. Although governments have the primary duty to protect and ensure fulfillment of human rights, RRD believes that we also have a responsibility to respect human rights and that we can contribute positively to human rights challenges in the communities where we operate. This statement describes RRD’s approach to human rights in all aspects of our operations globally, including all employees in our organization.

Community Engagement

RRD seeks to build strong and lasting relationships with our partners in the workplace, marketplace, and community. These relationships are largely forged by our hardworking employees. RRD is acutely aware that as an employer, and as a part of each of the communities in which our sites are located, it is imperative we tackle and assess the issue of Human Rights. Tackling these issues is among the key priorities of RRD and its corporate responsibility strategy.





A Foundation of Compliance

Recognizing that governments have the responsibility to protect and uphold the human rights of their citizens, RRD respects and complies with the human rights laws of the countries where we operate. We train our employees and monitor behavior to ensure compliance with our policies, practices, and procedures, as well as applicable law. For example, RRD employees are required to formally certify compliance with our Principles of Ethical Business Conduct (“PEBC”) and complete online interactive compliance training.

We expect our suppliers and business partners to similarly adhere to these human rights principles. Our supplier code of conduct emphasizes these same standards. These human rights principles to which RRD is committed include freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced labor, the effective abolition of underage labor, and the elimination of discrimination in respect to employment and occupation. RRD is also committed to safe and healthy working conditions and individual dignity. RRD Suppliers who have questions or need assistance in these areas are encouraged to contact us directly and to consult our Supplier Code of Conduct.

Respect for the Individual

We commit to treating all people with respect, whether a co-worker, supplier, client or anyone doing business with us. This means treating one another with fairness and dignity in all our interactions in the workplace and as members of society. We seek and embrace differences in people, ideas, and experiences, and we value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and do not tolerate discrimination, harassment, or retaliation. It is Company policy to engage in activities such as hiring, promotion and compensation of employees, without regard to race, color, religion, sex, gender, gender identity or expression, sexual orientation, national origin, genetics, pregnancy, disability, age, or any other status protected by applicable law. Instead, the basis for recruitment, hiring, placement, development, training, compensation, and advancement at the Company is qualifications, performance, skills, and experience. RRD fosters an environment where every RRD employee belongs and is able to thrive because of their differences, not in spite of them.

The Company rejects forced, bonded or indentured labor or involuntary prison labor. All workers shall be voluntary, and workers are free to leave upon reasonable notice. Workers are not required to surrender government-issued identification, passports, or work permits as a condition





of employment. The Company prohibits the use of child labor. The term “child” refers to any person under the age of 15, under the minimum age for completion of compulsory education, or under the minimum age for employment in the applicable country. The employment of young workers below the age of 18 shall only occur in non-hazardous work and only when young workers are above the country’s legal age established for completing compulsory education. We support the use of legitimate workplace apprenticeship, internship, and other similar programs that comply with all laws and regulations applicable to such programs.

RRD fairly compensates its employees by providing wages that are in compliance with the local and national laws of the jurisdictions in which we do business. RRD also maintains employee work hours in compliance with local laws and applicable laws of the jurisdictions in which we do business.

We recognize there are different views about freedom of association. RRD respects the rights of its employees to join, form, or not to join an employee association or trade union of their choice without interference, consistent with applicable laws. Employees should exercise these rights in an informed manner, and with the benefit of thoughtful consideration and available information. In the exercise of these rights, we believe in the free exchange of ideas, opinions, and information provided there is no interference.

Act with Integrity

Acting with integrity guides how we approach our work related to respecting human rights, and we have committed to the following:

- Assessing, on a regular and ongoing basis, potential adverse human rights impacts, the severity of the potential impact, and our applicable standard operating policies;
- Integrating relevant human rights findings into policies and procedures;
- Tracking progress as part of RRD’s commitment to continuous improvement;
- Communicating with relevant stakeholders to shape and inform our work and priorities; and
- Training our teams and adjusting our human rights priorities, as needed.

While there exist a variety of mechanisms to raise and seek redress of actual or perceived human rights violations, RRD has developed additional grievance mechanisms to enable employees, clients, suppliers or suppliers’ employees, communities where we operate, and other stakeholders





to be heard and be given proper consideration. These mechanisms include, but are not limited to, our [anonymous Ethics Hotline](#) and longstanding Open Door Communications Policy for employees, and the internal structures that support resolution of each issue raised. We encourage stakeholders to raise concerns and to report activities they suspect may contravene the values and positions we express in this statement or any RRD policy. We will not tolerate retaliation against any party for raising concerns in good faith.

Governance

Our Ethics and Compliance Committee (“ECC”), comprised of senior leaders across the business, also reviews and approves this Policy on an annual basis and provides leadership and direction on corporate responsibility issues, including human rights. RRD’s Executive Leadership Team is responsible for our economic, environmental and social corporate responsibility programs and progress, including our dedication to human rights, and our adherence to RRD’s compliance programs. Further, the Corporate Responsibility & Governance (“CRG”) Committee of RRD’s Board of Directors annually reviews a variety of RRD’s programs including this policy.

