

## COMPLIANCE STATEMENT – MODERN SLAVERY ACT 2015

This statement is made pursuant to S.54, Part 6 of the Modern Slavery Act 2015 and the requirement for certain businesses to provide disclosure concerning their efforts to address issues of modern slavery and human trafficking in their own operations and in their supply chain.

### Executive Summary

Donnelley Financial Solutions Inc (DFSCO) is a global service provider and accordingly has a duty to operate its business in an ethical fair and responsible manner. DFSCO operates an information technology and service based business and considers that the risk that any form of bonded labour, child labour, forced labour, slavery, trafficking or workplace (“Modern Slavery and Related Human Rights Abuses”) abuse exists within its supply chain is low.

Donnelley Financial Solutions UK Limited (“DFSCO UK”) is 100% beneficially owned by DFSCO and has its business primarily based in the UK and Europe, as an employer and as a part of each of the communities in which our sites are located, that the expectations upon us are changing in line with the increased global focus on the role of business within Modern Slavery and Related Human Rights Abuses. DFSCO UK is evolving its approach to engage with this changing landscape of corporate responsibility and the new reality of supply chain awareness. DFSCO UK is continually reviewing its policies and procedures to take all steps necessary to prevent the risk of Modern Slavery and Human Rights Abuses occurring in its business.

### Structure, business and supply chains

Eradicating Modern Slavery and Related Human Rights Abuses in our supply chain is essentially our suppliers’ responsibility however DFSCO UK has undertaken the following actions:

- (i) **Strategic Approach:** DFSCO UK long term strategic goals include:
  - Identifying High Risk Areas for Modern Slavery and Human Rights Abuses in its supply chain;
  - Commit to contracting with its customers in an ethical manner that seeks (where applicable) to include appropriate measures to prevent Modern Slavery or Human Rights Abuses;
  - Develop a lasting corporate legacy on DFSCO UK zero tolerance policy to Modern Slavery and Human Rights Abuses;
  - Develop an engaging staff training programme on the impact of the Modern Slavery Act;
  - Develop a Code of Conduct for its suppliers to adhere to – to reflect the core ethical principles shared by DFSCO UK and its business.
- (ii) **Audit:** DFSCO UK will continue to develop its policy on Modern Slavery, which is currently reviewed throughout the year and with policies updated on an annual basis.
- (iii) **Due Diligence:** In our assessment of risk we will consider the nature of the risk, severity of the risk, the level of influence a business may have over its own supply base and the level of influence which may be interpreted that DFSCO UK may have over that supplier.
- (iv) **Self Assessment:** Through our internal assessment, we are looking at varied ways to assess risk through specific country risks, sector risks, transaction risks and business partnership risks.
- (v) **Contractual Review:** DFSCO UK has reviewed its contractual documentation in order to fully understand its process of identifying and stopping any Modern Slavery and Related Human Rights Issues, giving particular consideration to where applicable:
  - Principles of Ethical Conduct of its customers and suppliers; and
  - the UK Modern Slavery Act 2015 (in so far as it applies to the suppliers).
- (vi) **Remedies; Dealing with Infractions:** DFSCO UK will monitor any supplier it reasonably suspects of committing Modern Slavery and Human Rights Abuses and contact the supplier to further understand and investigate any potential violations. DFSCO UK will work with the supplier to remedy the breach if it believes that it is capable of remedy. DFSCO UK is

committed to incorporating robust termination rights into its contracts (with suppliers and customers) in order to terminate contracts where Modern Slavery and Human Rights Abuses are committed.

- (vii) **Training:** DFSCO UK is reviewing its current training modules with a view a mandatory training module for all employees that may have to give consideration to Modern Slavery Act 2015 and will be required to identify potential circumstances where Modern Slavery and Related Human Rights Abuses may exist.
- (viii) **Senior Sponsorship:** Due to the low risk of Modern Slavery and Related Human Rights Abuses that DFSCO has determined exists in its supply chain, DFSCO UK will continue to review its position with a view to evolving its policy on the Modern Slavery Act and to involve a proactive role of employees and senior managers within the company. Meetings with senior management to develop and evolve the DFSCO UK policies, preventing Modern Slavery and Related Human Rights Abuses, are planned on an annual basis.
- (ix) **Reality Check:** DFSCO UK aims to encourage and foster a culture of disclosure to ensure that any Modern Slavery and Human Rights Abuses are reported at the earliest opportunity.

**Signed for and on behalf Donnelley Financial Solutions UK Limited Date June 2018**



**TUAN JIN AW - DIRECTOR**