



## **Anti-Retaliation Policy**

This Anti-Retaliation Policy (the “Policy”) applies globally to all RRD employees, and to members of the board of directors, agents, consultants, contract labor, and others when they are representing, acting for, or acting on behalf of RRD (each a “Covered Person,” and collectively, “Covered Persons”).

RRD is committed to maintaining a work environment that is free of harassment, intimidation, discrimination, and retaliation for engaging in protected activity, including reporting or participating in investigations of suspected violations of law, the Principles of Ethical Business Conduct (PEBC), or other Company policies and procedures. Such an environment is crucial to promoting an atmosphere in which Covered Persons feel safe to engage in frank, honest communication—raising questions or concerns at any time without fear of retaliation.

RRD strictly prohibits any form of retaliatory action against Covered Persons who raise issues, ask questions, make reports, participate in investigations, refuse to participate in suspected improper or wrongful activity, or exercise workplace rights protected by law (in each case, “Protected Activity”).

### **Protection from Retaliation**

Any Covered Person who engages in Protected Activity will be shielded from retaliation. Retaliation occurs when an employer takes an Adverse Action against a Covered Person because she or he engaged in Protected Activity. Adverse Action includes but is not limited to demotion, suspension, termination, failure to hire, failure to promote, failure to give equal consideration in making employment decisions, adverse impact to working conditions, denial of employment benefits, and creating a hostile or intimidating work environment.

RRD prohibits retaliation even if the concerns raised are not confirmed following an investigation. However, a Covered Person may be subject to Adverse Action if she or he knowingly makes a false allegation, provides false or misleading information in the course of an investigation, or otherwise acts in bad faith.

This Policy does not exempt Covered Persons from the consequences of their own misconduct or inadequate performance, and self-reporting misconduct or performance issues is not Protected Activity. This Policy also does not prevent RRD from managing performance or conduct issues after a Covered Person has engaged in Protected Activity, so long as Protected Activity is not the reason for the performance or conduct management.

### **Obligation to Raise Concerns**

RRD depends on its employees, agents, and other representatives to raise questions or concerns so that the Company can take appropriate action. All Covered Persons are required to report any reasonable suspicion of improper or wrongful activity. Several different channels for reporting are available, which are explained in detail in the PEBC and on the RRD intranet.



Reports of suspected improper or wrongful activity will be treated confidentially, and Covered Persons may choose to report concerns anonymously. If submitting a concern anonymously, it is important to provide sufficiently detailed information regarding the subject matter of the concern and to identify potential witnesses to enable RRD to effectively address the concern.

Covered Persons who believe that they have witnessed retaliation, that they have been personally retaliated against, or that any other violation of this Policy has occurred must immediately notify the Chief Compliance Officer, the Human Resources Department, or a member of the Legal/Compliance Department. RRD takes all claims of retaliation very seriously, and reports will be reviewed promptly and investigated where appropriate.

Covered persons who have questions concerning this Policy also should contact the Chief Compliance Officer, the Human Resources Department, or a member of the Legal/Compliance Department.

### **Consequences for Policy Violations**

Any Covered Person who retaliates against another for engaging in Protected Activity, or who otherwise violates this Policy, is subject to disciplinary action, up to and including termination.