

MODERN SLAVERY STATEMENT FOR THE FINANCIAL YEAR 2017

This statement is made pursuant to S.54, Part 6 of the Modern Slavery Act 2015 and is effective for the Company's financial year ended 31 December 2017.

In this statement references to the "the Company" or "RRD" shall be references to RR Donnelley UK Limited, and references to "the Group" shall be references to RR Donnelley UK Limited and its subsidiaries.

Executive Summary

RRD is a leading provider of outsourced communication and business services. We work with many of the world's leading organisations to help transform the way they engage and interact with their customers. The Company adheres to the letter and spirit of all applicable legislation. Further, it is the Company's policy to conduct its business with the highest ethical standards.

The Company believes that it has a duty to run its business responsibly and is committed to ensuring that no form of bonded labour, child labour, forced labour, slavery, trafficking or workplace abuse exists in its own businesses or within its supply chain. For the purpose of this disclosure we use the term "Modern Slavery and Related Human Rights Abuses" to encompass the above mentioned issues.

The Company 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 Modern Slavery and Related Human Rights Abuses in line with the increased global focus on the role of business in this space. As a result, the Company is actively enhancing its approach to engage with the changing landscape and evolving environment of Modern Slavery and Related Human Rights Abuses. Tackling these is among the key priorities of RRD and its corporate responsibility strategy. The Company's ongoing actions include the implementation of various procedures and policies alongside an incorporation of these concerns into our workplace attitude and our culture, and that of our suppliers.

Our Business

RRD's Structure, Business and Supply Chains

The Company and its subsidiaries operate in the United Kingdom, Ireland, and across Continental Europe, and provide services to clients in these and many other countries. Due to the nature of the services that the Company provides our supply chain is complex. Our vast and diverse network of suppliers stretches globally into Europe, the Middle East, Asia and the Americas and consists of small, medium sized enterprise and large scale corporations with the majority residing in the UK and mainland Europe. There are also various tiers of suppliers of the goods and services used by the Group in the services we provide to our valued client base.

As a business we are committed to acting responsibly and supporting the objectives of the Modern Slavery Act 2015. The Company has established an enhanced strategic approach to vetting current and new suppliers in these two channels through the following activities:

(i) **Due Diligence:** The Company currently carries out detailed due diligence prior to on boarding a new strategic supplier. We have broadened this process with expanded investigations including enhanced due diligence procedures. We will establish what form these investigations may take based on what is suitable for the assessed risk profile of the individual supplier. The Company seeks to maintain a zero tolerance approach in relation to failings around Modern Slavery and Human Rights Abuses which may become evident during due diligence enquiries. The Company is eager for a supplier's human rights approach and policy to play an integral part in our potential selection of that party to support us in our business and in delivering services to our clients.

(ii) **Our Policies:**

A. Principles of Ethical Business Conduct

RRD's Principles of Ethical Business Conduct policy outlines the human rights standards expected of both our employees and our suppliers, including:

- Provision of a workplace free of harassing, abusive, disrespectful, disorderly, disruptive or other unprofessional conduct;
- Anti-discrimination; and
- Anti-corruption.

These principles are endorsed by our internal policies including:

- Human Rights;
- Recruitment and Selection;
- Employment and Immigration;
- Disciplinary;
- Grievance;
- Open Door; and
- Whistleblower.

All of our employees receive a written contract and an employee handbook. Together these outline their terms and conditions of employment, including but not limited to pay, working hours, holiday entitlement and pay, overtime rates, sick pay, deductions and salary reviews. We carry out checks to ensure that our employees have a legal right to work in the UK or other countries in which they are employed. Any third party contract staff engaged by the Company are subject to the same checks as our employees. Each employee is responsible for ensuring they comply with the Principles of Ethical Business Conduct with an annual confirmation of this policy that employees must complete. Our Modern Slavery Statement is placed in a prominent position on the business website site, and the Company's intranet portal, and thereby accessible for all our employees to view.

Additional HR and payroll checks have been introduced within our own employee population to highlight any concerns or early warning signs of modern slavery.

B. Supplier Code of Conduct

Our Supplier Code of Conduct states that:

- Labour must be freely chosen;
- We do not allow child labour;
- Working hours must be in accordance with the local laws and applicable laws in the jurisdiction in which they do business;
- Employees wages must be fair and in compliance with local and national laws of the jurisdiction in which they do business;
- Employees must have access to clean toilet facilities and drinking water;
- There should be direct strong relationships with employees and employers;
- No employee should experience harassment or bullying of any sort; and
- Suppliers must comply with all relevant international, national and local health and safety regulations.

We maintain a tracker of all suppliers currently signed up for our Supplier Code of Conduct. We review and update this tracker and the obligations within the Code on a bi-annual basis. The Supplier Code of Conduct is likewise reviewed on an annual basis and updated as required with increased commitments and expectations on suppliers with regard to corporate social responsibility, and to reflect further obligations expected as new legislation and regulations are passed.

(iii) Audit:

Beyond the due diligence procedures outlined at (i) above, audits are regularly conducted for our existing strategic supply base. These audits assess a wide variety of issues including employment practices, subcontracting policies, working practices, management structures, capacity for types of workload and compliance with the our Supplier Code of Conduct. These audits are also intended to identify any Modern Slavery and Related Human Rights Abuses practices. We review what appropriate investigative and remedial actions should be taken if issues of concern are identified. The Company has expanded both the scope and scaled of our auditing program, particularly in relation to Modern Slavery and Related Human Rights Abuses practices during the past year. We have increased our audits to include Dubai, a potential high risk country regarding their employment practices, this has taken place within our supply base with satisfactory results.

The Company continually seeks to put in place improved and strengthened audit rights and procedures within our strategic supply base. The Company aims to analyse the audit tools currently utilised and determine any necessary improvements to the existing system, including but not limited to on-site physical inspections; policy audits and audits in line with risk profile. We have made significant progress within our audit programme of our Tier One Marketing Print suppliers with the increased number of physical site inspections, which evidenced no adverse findings. There was also no evidence or suspicion relating to Modern Slavery and Related Human Rights Abuses in our supply chain.

(iv) Contractual Review; Remedies:

Our supplier engagement documentation process considers Modern Slavery and Related Human Rights Abuses. In this documentation we include obligations to comply with:

- The Supplier Code of Conduct;
- Our Principles of Ethical Business Conduct; and
- The UK Modern Slavery Act 2015 (in so far as it applies to the supplier).

The Company has strengthened its position in dealing with any reasonable suspicion held by an employee of the Company of human rights infractions committed by a supplier whether or not connected to the supplier's business with the Group. The Company will contact the supplier and endeavour to hold meetings to understand the infraction and to agree remedies that can be taken, whether or not the matter in question involves informing appropriate authorities.

The Company is keen to work with the supplier and respond to the situation as a responsible company keeping in mind the best interests of those people who may be affected. Alongside these efforts, in the event of findings with respect to Modern Slavery and Related Human Rights Abuses which concern the Company, where we feel it necessary in an effort to protect our customers, our employees, our reputation and critically those people potentially at risk of human rights abuses, the Company may exercise these rights in terminating the relationship with the supplier.

(v) Training:

We are committed to ensuring that the Company's employees are equipped to understand the implications of possible Modern Slavery and Human Rights Abuses in our business and to identify risk factors and escalate appropriately. The Company has developed specific targeted training for our:

- Senior leadership team in relation to the Modern Slavery Act 2015;
- Dedicated Sourcing and Procurement colleagues; and
- Subject matter experts holding key relationships with our supply base.

We continue to review and evaluate training materials within the market place regarding new developments for the business, including potential new topics, focus areas and risks that arise within the area of Modern Slavery.

(vi) Senior Sponsorship:

The Company has a Corporate Responsibility (CR) Board which meets every quarter. Our Corporate Responsibility Strategy has been agreed by the Senior Leadership Team – the highest level management committee of RRD within Europe.


The delivery of our strategy is managed by a Corporate Responsibility Leadership Group chaired by our Vice President (VP) of Human Resources for Europe with additional VP and Director level representation from across the business, including: VP of Operations, VP of Sales & Marketing, Director of Client Services & Sourcing, Marketing Director, Director of Sector and VP of Legal.

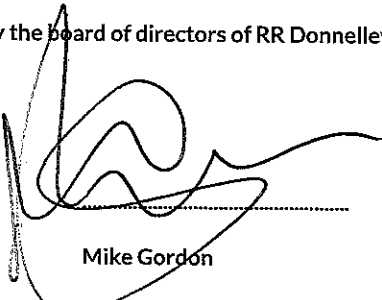
We acknowledge that Modern Slavery and Human Rights Abuses exist in many jurisdictions in which we operate and/or from which we procure goods or services. We embrace the increasing global focus on Modern Slavery and Related Human Rights Abuses. To that end we encourage fostering a culture of disclosure along with the procedures listed in this statement to better enable these issues to come to light so that we can work towards eradicating Modern Slavery and Human Rights Abuses.


Our executive leaders are there to ensure that we run our business responsibly and to implement procedures and policies to tackle Modern Slavery and Related Human Rights Abuses. We are committed to continually improve and excel in this area.

This statement has been approved by the board of directors of RR Donnelley UK Limited

Date: 27 JUNE 2018



John Farmer
Director

Mike Gordon
Director

Kevin Woor
Director