



Global Human Rights Policy

Effective December 1, 2024

Our Commitment

Human Rights are universal to all people regardless of our culture or background. At Donnelley Financial Solutions (“DFIN”), our commitment to respect human rights – the right to dignity, fairness, equality, freedom, and safety - is foundational to our business and arises from the [Core Values](#) that guide our interactions with employees, clients, shareholders, and suppliers.

Our Human Rights Policy (“Policy”) and commitment to respect human rights align with several international frameworks recognized globally such as - the United Nations Guiding Principles on Business and Human Rights (UNGP) and the International Bill of Human Rights which consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights. Other international standards guiding this Policy include the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct.

Applicability

This Policy and our commitment apply to the Company’s global operations, all employees and contractors, and its supply chain through vendors, suppliers, or any other third-party working or engaged on DFIN’s behalf. As a company, we abide by the laws in the countries where we operate. Where local laws are less stringent than our policies, we are guided by the more stringent policies and standards and encourage our suppliers to follow these standards and principles.

Scope

We respect human rights through several existing policies and practices that identify and prevent adverse impacts from DFIN’s business activities and outline actions to address these impacts if they occur.

- **Anti-Discrimination and Harassment** It is our responsibility to provide a work environment that is free of discrimination, harassment, and retaliation and to provide equal employment opportunities to all qualified applicants and employees regardless of race, color, religion, gender, age, national origin, ethnicity, marital status, sexual orientation, gender identity or expression, disability, or military status.
- **Code of Conduct** Our [Principles of Ethical Business Conduct](#) apply to everyone – directors, officers, and employees – and reflect our commitment to conduct business with the highest standards of integrity in our relationships with one another and with clients, suppliers, shareholders, and others in the communities where we live and work.
- **Data Privacy and Protection** Privacy is a fundamental human right and we recognize the importance of protecting the critical business and personal information entrusted to

us. Our approach to how we collect, share, use and protect sensitive information is described in the Company's [Privacy Notice](#).

- **Diversity and Inclusion.** It is our responsibility to ensure our workplace continues to be inclusive, equitable and diverse and that we have a culture supporting that commitment. We value all voices and want our employees to feel free in expressing theirs. We also encourage our suppliers to share in this commitment throughout their business practices.
- **Environmental, Health and Safety** DFIN's [Global Sustainability Policy](#) describes our commitment to operate the business in a manner that protects the environment and the health and well-being of the Company's most important asset – our people. Providing a safe work environment has always been one of DFIN's priorities in addition to using the world's natural resources responsibly.
- **Fair Compensation and Working Hours** DFIN's compensation programs offer market-driven pay and comprehensive benefits. In our pay-for-performance culture, we encourage employees to take ownership of business outcomes and accountability for their efforts to clients and one another. We comply with local and national laws governing employee wages and work hours and instill a culture where our employees can balance work with their family and personal responsibilities.
- **Freedom of Association and Collective Bargaining** We respect the legal rights of employees to associate freely and to join or not join a union. We believe that all parties' interests are better served when we maintain engaging, open, and two-way communication with our employees directly.
- **Grievance and Access to Remedy** We maintain a work culture in which employees are invited to raise questions or concerns to any level of management as described in the Company's *Open Door Policy*. We will not tolerate retaliation or discrimination for employees' voicing their concerns. Employees are also encouraged to make good faith reports of any suspicion of illegal practices, violations of adopted policies or misconduct as described in the Company's *Whistleblower Policy*. Concerns can be reported confidentially and anonymously.
- **No Forced Labor, Child Labor, or Human Trafficking.** As described in our [Modern Slavery Act Compliance Statement](#), DFIN has a zero tolerance for Modern Slavery abuses where individuals are exploited for personal or commercial gain. We oppose human trafficking and the use of forced labor, bonded labor, indentured labor and child labor in our business operations and supply chain and will comply with applicable laws prohibiting such exploitation.
- **Supply Chain Expectations** We are committed to respecting human rights in our supply chain and communicate those expectations in the company's [Supplier Code of Conduct](#). Suppliers must uphold internationally recognized human rights and are expected to avoid complicity in the abuse or violation of internationally proclaimed human rights standards.

Monitoring and Reporting

We have a duty to protect human rights in addition to respecting them. That is why DFIN takes this Policy seriously. If we become aware the company has caused or contributed to adverse rights impacts within the context of its own activities, we will seek to remedy those impacts. For employees, if you are aware of a violation of law or a company policy,

you should report this information to your supervisor, manager, the Chief Compliance Officer, or a member of the Legal Department. Alternatively, if you wish to remain anonymous, you may report your concerns using the company's "Report It[®]" hotline reporting platform. For suppliers and other third parties, penalties for violations of this Policy may include restricted activities, termination of an account, or other actions.

Governance and Accountability

This Policy is part of DFIN's Ethics and Compliance Program, overseen by the cross functional Ethics and Compliance Committee. An overview of the Company's compliance activities and corporate governance practices, including human rights protections, is provided periodically to the Executive Leadership Team and the Board of Directors, primarily through the Corporate Responsibility & Governance Committee. DFIN will review and update this Policy periodically to align with related Company policies and the interests of our stakeholders – employees, clients, and shareholders. This policy will be publicly available to our employees and stakeholders.

Daniel N. Leib
President and CEO