



INVESTIGATIONS POLICY

POLICY STATEMENT

RRD is committed to conducting its affairs ethically and in compliance with laws, regulations, and policies, and to safeguarding members of the RRD community and its resources.

REASON FOR THE POLICY

When a report of potential ethical misconduct or other wrongdoing is made, the Company has a responsibility to investigate and implement corrective action as needed. To meet this responsibility, employees of RRD must cooperate with investigations.

POLICY

An “investigation” is any RRD-authorized internal or external examination, inspection, inquiry, analysis, or review to determine facts. An investigation is not a hearing or legal proceeding and may be formal or informal. Investigations may be undertaken by RRD employees internally, by outside resources engaged by the Company, or by government agencies.

Duty to Cooperate

All employees must cooperate fully with investigations undertaken by RRD, whether using internal or external resources, and with investigations by government agencies in which the Company is cooperating. Employee cooperation with investigations includes, but is not limited to:

- Promptly acknowledging and responding to requests for information;
- Making oneself available for meetings with investigating officials;
- Providing full, accurate, and truthful information;
- Keeping confidential information learned or transmitted during the investigation, unless directed otherwise by members of the investigation team; and
- Preserving relevant information and documents, including emails and other electronic data.

Non-cooperation or obstruction of an investigation is subject to disciplinary action, up to and including termination of employment.



Confidentiality and Non-Retaliation

Confidentiality for individuals who are interviewed or otherwise cooperate in an investigation will be maintained to the extent possible by law. While absolute confidentiality cannot always be guaranteed, all matters will be kept private (i.e., shared only with those with a need to know).

To protect the confidentiality of individuals who participate in investigations and to protect the integrity of the investigative process, individuals normally will not be informed of the outcome of an investigation.

Retaliation based on an individual's cooperation with an investigation is prohibited and subject to disciplinary action. Any suspected retaliation should be reported immediately to the Chief Compliance Officer, consistent with RRD's Anti-Retaliation Policy.