

DONNELLEY FINANCIAL SOLUTIONS

Selected Business Practices and Policies

For further details, please see our Principles of Ethical Business Conduct.

1. Anti-Corruption/Ethics

Donnelley Financial Solutions deals with suppliers, customers, employees and competitors on a fair and honest basis. Buying and selling is done on an “arm’s length” basis, free of any kickbacks, bribes, secret commissions, gifts or favors. We will not take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or other unfair dealing practices.

The Company will not, directly or indirectly, pay bribes to or otherwise improperly influence government officials, political parties or candidates for political office, even if such a payment or transfer of anything of value is requested by a foreign national or called something other than a bribe. We will not do indirectly what cannot be done directly; improper payments to intermediaries will not be tolerated.

2. Antitrust

It is the policy of Donnelley Financial Solutions to comply with all antitrust laws in the United States and in other countries where the company does business.

3. Child or Forced Labor

Donnelley Financial Solutions complies with all laws affecting employees and does not employ child or forced labor. The term “child” refers to any person employed under the age of 16, or, as applicable in the location in which the individual resides, under the age for completing compulsory education, or under the minimum age for employment in such location.

4. Coercion and Harassment

It is and has been the policy of Donnelley Financial Solutions to maintain a work environment free of unlawful discrimination for all employees. The Company will not tolerate or condone any verbal or physical conduct by any employee that harasses, disrupts, or interferes with another's work performance or that creates an intimidating, offensive or hostile environment. Any such conduct directed at an individual because of his/her race, sex, national origin, color, age, religion, genetic information, perceived or actual disability, perceived or actual sexual orientation, gender, identity or expression, pregnancy, age or military status is strictly prohibited.

5. Compensation and Working Hours

Donnelley Financial Solutions fairly compensates its employees by providing wages that are in compliance with the local and national laws of the jurisdictions in which we do business.

Donnelley Financial Solutions also maintains employee work hours in compliance with local laws and applicable laws of the jurisdictions in which we do business.

6. Compliance with Laws

Donnelley Financial Solutions acts with integrity and in compliance with all applicable laws in every country in which it does business, and we expect our employees to do the same.

7. Emergency Planning/Preparedness

Donnelley Financial Solutions identifies and assesses emergency situations and events, and minimizes their impact by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

8. Freedom of Association

Donnelley Financial Solutions recognizes our employees' right to join or not join a union, but we believe that all parties' interests are best served when we maintain good, solid and direct working relationships with our employees, customers, and suppliers. Our consistent lack of any significant negative activity in this area indicates that our employees agree. When such questions do arise, we believe in open discussion with our employees and will protect our employees' right to a government supervised secret ballot election where they can vote free of any coercion or intimidation.

9. Health and Safety/Workplace Environment

Providing a safe environment has always been Donnelley Financial Solutions' first priority. We regard working safely as our single most important job and join many of our customers in regarding safety as the first measure of operational excellence. To create safe working environments in our operations worldwide, Donnelley Financial Solutions has developed and implemented a "plan, do, check, act" safety management system. We have established a series of interrelated standards that define how health and safety should be managed across our global operations.

Donnelley Financial Solutions' goal is zero injuries. This important objective is reflected in practices and programs that have enabled our employees to post safety metrics that far outperform the industry's average.

10. Immigration

Donnelley Financial Solutions only employs workers with a legal right to work, and validates all employees' identity and entitlement to work, as required by law.

11. Monitoring and Compliance/Audit

Upon reasonable prior written notice, Donnelley Financial Solutions permits its customers to visit Donnelley Financial Solutions' facilities to review Donnelley Financial Solutions' compliance with these Business Practices and Policies. Donnelley Financial Solutions may restrict customers from areas or records containing information of Donnelley Financial Solutions, its employees, its other customers or consumers.

12. Nondiscrimination

Donnelley Financial Solutions is committed to ensuring equal employment opportunity and fair treatment for employees commencing with hiring and including any employment decision. We will not discriminate in any employment action on the basis of race, religion, color, national origin, sex, gender identity or expression, age, disability, perceived disability, sexual orientation, veteran status, or genetic information, or on the basis of any other status protected by applicable federal, state or local laws. The Affirmative Action Plans support the Company's effort to statistically monitor our progress toward a diverse workforce. This policy applies to all terms, conditions and privileges of employment.

13. Protection of the Environment

Donnelley Financial Solutions' environmental health & safety policy is to strive continuously to improve global Environmental Health & Safety performance by using practices that protect employees and the environment, including reducing the quantity of emissions, developing opportunities for recycling and pollution prevention and using paper, energy, and other resources more efficiently.

14. Retaliation

Donnelley Financial Solutions has an Open Door Policy which allows any employee to discuss any issue with any member of management. Employees may also call the company's Ethics Hotline, anonymously if desired, and report a concern. Retaliation for raising a concern or for participating in an investigation is strictly prohibited.

15. Security/Protection of Customer Assets

Employees are prohibited from taking customer or Company property, including furnished raw materials, in process goods, rejected and/or finished goods, from any Donnelley Financial Solutions facility, except for authorized business with the customer.

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In addition, employees are prohibited from trading in securities of the Company, its customers, suppliers or other business partners based on confidential information.