

## **MODERN SLAVERY ACT STATEMENT**

Pitney Bowes' core value statement, "We do the right thing, the right way," defines how we've chosen to conduct our operations and sets the tone for how we interact with our stakeholders. Employees of Pitney Bowes are committed to treating our clients, business partners, co-workers and communities where we live and work with fairness, honesty, respect and integrity. The company's success as industry leader, employer, business partner and global citizen has been built on these commitments for more than 95 years. We are a member in good standing in the FTSE4Good Index, the responsible investment index sponsored by the FTSE Group.

This statement further sets out the steps we are taking to combat slavery and human trafficking.

### **ORGANISATION'S STRUCTURE**

Pitney Bowes Inc. (NYSE:PBI), is a global technology company powering billions of transactions – physical and digital – in the connected and borderless world of commerce. PBI has its head office in the United States of America. The PBI Group has over 13,000 employees worldwide in direct operations in 12 countries, and operates through partners in many other territories. The Group has a global annual turnover of US\$3.5 billion.

The PBI Group in the UK consists of Pitney Bowes Limited, Pitney Bowes Finance Limited, Pitney Bowes Software Europe Limited, Portrait Software International Limited and Borderfree UK Limited (among others).

### **OUR SUPPLY CHAINS AND DISTRIBUTION CHANNEL**

Our supply chain and distribution channel includes:

- Procurement of thousands of products, parts, supplies, software and services from suppliers located in multiple geographies (including The Americas, Europe and Asia);
- Warehousing and distribution from strategically located, third party facilities in North America and Europe and
- On-line sales channels, a direct sales and service force, and third party channels, retained to distribute and resell products and services.

### **OUR APPROACH TO PREVENTING SLAVERY AND HUMAN TRAFFICKING**

We are committed to maintaining business operations, including our supply chain, that do not use or rely on modern slavery or human trafficking; to acting ethically and with integrity; and to implementing and enforcing effective systems and controls in an effort to prevent slavery and human trafficking in our supply chains.

**Employee Accountability Standards:** PBI's internal accountability standards for employees are found in our Business Practices Guidelines (our employee code of conduct), our human resources policies and local rule of law. Our employee code of conduct provides that "Pitney Bowes opposes the use of forced labor or the unlawful employment of children in any place where we do business, or by any contractor, agent or supplier with whom we do business." PBI's corporate Global Human Rights Policy, based on the core standards of the International Labour Organization (ILO), and

provides that PBI “supports (to the full extent permitted by law), conduct that is consistent with the four core principles of the ILO Declaration on Fundamental Principles and Rights at Work.” Subject to the provisions or requirements of local law, and after due diligence and full and fair investigation, any PBI Group employee found to have engaged in slave labor or human trafficking will be subject to immediate termination of employment.

### **Supply Chain Accountability Standards:**

- **Supplier Selection:** As part of our initiative to identify and mitigate risk, PBI’s Supply Chain and Procurement functions engage in verifications of suppliers to evaluate and address risks of human trafficking and slavery in the supplier’s quality, environmental, human resources and security standards and operations. These verifications are conducted in connection with PBI’s pre-contract due diligence and evaluation process as further detailed in the section below on “Risk-based assessments and audits”. Once approved the supplier must contractually commit to meeting the standards set by PBI or be subject to restrictions or termination of their contractual relationship with us. Key suppliers are also subject, through contractual provisions preserving audit rights for PBI and any third-party reviewer retained by PBI, to a review of their facilities. In appropriate cases we conduct verification regarding whether our suppliers use labour brokers.
- **Supplier Code of Conduct:** All of our strategic suppliers are required to acknowledge and adhere to a Supplier Code of Conduct, to seek to conform to its standards and provisions and to apply the Code to their suppliers engaged in the production of goods for the PBI Group. As stated in our Code we require that, as a condition of doing business with us, suppliers:
  - agree not to engage in any form of human trafficking or slavery. PBI has given suppliers examples of good management practices for evaluating and addressing risks of human trafficking in their own supply chain including not using forced or involuntary labor of any type or illegal child labor. All employment must be voluntary and legal. (Code page 4.)
  - comply with all applicable wage and hour laws and regulations including those relating to minimum wages, overtime hours, piece rates and other elements of compensation and provide legally mandated benefits. (Code page 5.)
  - treat all employees with respect and not use corporal punishment, threats of violence or other forms of physical coercion or harassment. Every supplier should have a policy that prohibits inappropriate conduct and a process for employees to report such conduct for supplier’s investigation and resolution. (Code page 7.)
- **Risk-based assessments and audits:** PBI in its discretion expressly reserves the right to verify a supplier’s compliance with the Code through audits or on-site inspections including interviews of the supplier’s employees in order to

evaluate supplier's compliance with PBI's standards for trafficking and slavery in supply chains and other PBI supplier standards. Such audits or inspections can be carried out by PBI or by a third party at PBI's request. From time to time PBI has conducted, or has retained third-party auditors to conduct, audits of our key suppliers' operations and facilities for a broad range of standards including, but not limited to, quality, environmental, human resources and security standards and operations. These audits are arranged in advance with the cooperation of the supplier and usually consist of interviews with supplier management and facility inspections. We conduct a periodic risk assessment, based on a geographical location, to determine status and risk in our supplier base and include a review of Modern Slavery as a topic in regular Supplier Business Reviews. In the event we identify any areas of concern, PBI is committed to working closely with suppliers to address and resolve those concerns.

- **Whistle-blowing:** For many years PBI has sponsored an Ethics Help Line for use by employees, clients, suppliers and others to make inquiries and report concerns about potential violations of Company policy or the law. The Ethics Help Line is available in many languages, toll-free, 24 hours a day, seven days a week for callers to submit their concerns anonymously (if they so choose) and without fear of retaliation.

#### **TRAINING**

To better sensitize our supply chain employees to the risks of modern slavery and human trafficking in our supply chains and our business, we continue to provide live training to that staff. All PBI employees receive training on our Business Practices Guidelines which requires their compliance with law and PBI policy on a periodic basis. Both management and non-management employees in our Supply Chain and Procurement functions receive periodic refresher training on human trafficking and slavery risk mitigation and avoidance. Pitney Bowes is committed to the highest standards of conduct throughout our supply chain. On a regular basis we review and update our policies and procedures to ensure that our high standards are upheld and to guard against the mistreatment of anyone in our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2018.

This statement was approved by the Boards of the PBI UK Group, namely Pitney Bowes Limited, Pitney Bowes Finance Limited, Pitney Bowes Software Europe Limited, Portrait Software International Limited and Borderfree UK Limited.

Gerard Willsher, Director  
Date: 14 May 2019

