MERRILL CORPORATION

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

INTRODUCTION

Merrill Corporation ("Merrill") has a responsibility to be alert to the risks of slavery and human trafficking in our business and in our work with third party vendors and suppliers. Thus, employees are expected to report such concerns and management are expected to act upon them.

ORGANIZATION'S STRUCTURE

Merrill provides technology-enabled platforms for secure content sharing, regulated communications and compliance services. Merrill is a Minnesota corporation with its headquarters located in St. Paul, MN and other locations worldwide such as Europe, Asia, Africa, South America, and North America.

Merrill has an annual turnover in excess of £36m.

OUR BUSINESS

Our business is organized into service lines including DatasiteOne, Financial & Regulatory Disclosure and Translations.

OUR VENDORS AND SUPPLIERS

Our vendors and suppliers supply chains includes but is not limited to translations, technical solutions and print.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. This Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk Merrill, where possible, builds long standing relationships with customers, third party vendors and suppliers and makes clear our expectations of business behavior.

With regards to national or international vendors or suppliers, we prefer to work with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to adopt ‘one-up’ due diligence on the next link in the chain.
We have systems in place to report concerns and to protect whistle blowers.

**SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. We expect all those that we engage in business with to comply with our values and the law. We require this contractually.

**TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and with our customers, third party vendors and suppliers, we will include training and this Policy to all relevant individuals and entities. All employees have been informed of Merrill’s expectations regarding slavery and human trafficking via Annual Security Training.

**OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We use the following to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or with our vendors or suppliers:

- Completion of contracts audits by area managers;
- Use of payroll systems; and
- Communication and training regarding Merrill’s behavioural expectations with our employees and third party vendors and suppliers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group’s slavery and human trafficking statement for the current financial year.