

# Randstad Group Supplier Code of Conduct

## Introduction

Randstad is the global leader in the personnel services industry. As a trusted partner in today's technology-driven world, we help people and organizations to realize their true potential. To underpin our claim to promote lifelong employment and contribute to the economic growth of society as a whole, we have defined our ultimate goal: By 2030, we will impact the working lives of 500 million people worldwide.

Sustainability has been one of Randstad's core values ever since the company was founded. Randstad is committed to environmentally and socially responsible corporate governance. We expect the same from all our suppliers. We also expect our employees to observe the principles of ecological, social and ethical behavior and to integrate them into the corporate culture. Furthermore, we strive to continuously optimize our business activities and services in terms of sustainability and ask our suppliers to contribute to this as part of a holistic approach.

We operate in a manner that serves the interests of all parties directly or indirectly involved in our business. Our suppliers make an important contribution to the quality of our services. Therefore, we expect our suppliers to adopt our standards and comply with this Supplier Code of Conduct, which is an integral part of our Terms and Conditions. It is designed to ensure that goods and services are procured in a socially responsible and sustainable manner and in accordance with our business principles.

As an industry leader in personnel services, we recognize the need to conduct business with integrity. For this reason, Randstad is a signatory to the United Nations Global Compact and respects and supports its ten principles relating to human rights, labor, the environment and anti-corruption. Full details can be found here: <https://www.unglobalcompact.org/aboutthegc/thetenprinciples/index.html>

The principles Randstad adheres to with respect to labor are set forth in the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work: Freedom of association and the right to collective bargaining, elimination of all forms of forced labor, effective abolition of child labor, and elimination of discrimination in the context of employment and occupation. Full details can be found here: <http://www.ilo.org/declaration/lang--en/index.htm>

Randstad is committed to upholding the highest ethical corporate standards. By making the Global Compact principles part of our strategy, culture and daily work, we ensure that Randstad employees and our suppliers meet these fundamental commitments. We consider the ten principles part of our corporate guidelines. Detailed information on our corporate guidelines can be found here: [https://www.randstad.de/s3fs-media/de/public/2020-07/geschaeftsgrundsaeetze\\_business\\_principles\\_randstad.pdf](https://www.randstad.de/s3fs-media/de/public/2020-07/geschaeftsgrundsaeetze_business_principles_randstad.pdf)

## 1. Supplier Code of Conduct

This Supplier Code of Conduct is designed to ensure that goods and services are procured in a socially responsible and ethical manner and in accordance with Randstad's corporate guidelines and the requirements of the German Supply Chain Act. The Code therefore leads to corresponding obligations for our Suppliers. Compliance with this Code is a key factor in determining whether we wish to enter into and/or continue a relationship with a Supplier. Suppliers are required to review all aspects of the Code and operate in accordance with the principles set forth. By signing the terms of the Code, the Supplier makes a

binding commitment to comply with these terms in all business dealings with Randstad. The terms of the Code also apply to any subcontractors or sub-suppliers of the Supplier and the Supplier is responsible for ensuring compliance throughout the supply chain. Randstad reserves the right to amend the Code.

A violation of this Code of Conduct may ultimately be grounds and cause for Randstad to terminate the business relationship, including all related supply contracts.

## **2. Legislation**

The Supplier must comply with all international, national and local laws relating to health and safety, labor and the environment. In addition, the Supplier must possess all necessary permits. If these are not available when an order is placed, the contractor must obtain them as soon as possible and within three months of order placement. Randstad will implement additional controls to ensure the protection of the company until the necessary permits are obtained. The Supplier will inform Randstad as soon as the required permits have been obtained. If local industry standards and/or international guidelines are stricter than locally applicable laws, the Supplier must comply with these stricter requirements.

## **3. Management systems and certification**

Randstad expects its Suppliers to comply with high industry standards relevant to the Supplier's industry related to data privacy and information security. If a Supplier uses artificial intelligence (AI) as part of its offering to Randstad, the Supplier will ensure that it uses AI ethically and responsibly and in accordance with Randstad's AI Principles.

Randstad strives to work with Suppliers that use certified quality management systems and standards (e.g., ISO 9001 and 14001). Suppliers must be able to provide the following information depending on the services or products offered:

information on the impact of its business activities on human rights, the environment, health and safety;

management information on controlling quality standards, combating bribery and corruption, and on data protection and information security;

the quantifiable targets that the company has formulated in these areas and the time frame in which it intends to achieve them;

interim information on the extent to which the company is making progress in achieving the targets set.

## **4. Monitoring and evaluation**

To ensure that global governance goals are met, Randstad tracks and monitors compliance with the Supplier Code of Conduct throughout the supply chain. In addition, compliance with the Code is discussed at Supplier meetings and at any other time as needed. If necessary, Randstad may decide to audit a Supplier with respect to the relevant aspects of the Code. This audit may be conducted by Randstad or by an appointed third party. If a Supplier is not (yet) able to comply with the provisions of this Code, Randstad will discuss with that Supplier what measures need to be taken to ensure compliance with the Code in the near

future. Failure to comply with the Code may result in either not entering into a supplier relationship or terminating an existing relationship. Termination of the supplier relationship includes the entire Supplier company together with affiliated companies.

## **5. Social responsibility and respect for human rights**

We expect our Suppliers to understand and promote the importance of our human rights responsibilities when doing business for Randstad, both in the context of business relationships with the Randstad Group and in all other business relationships. This includes promoting a diverse and inclusive workforce – also among our Suppliers. We are particularly committed to protecting those groups of people who are especially vulnerable in the labor market. Depending on the country and/or region, vulnerable groups may include children, people with disabilities, migrant workers, the LGBTI+ community, indigenous peoples, ethnic minorities, and the long-term unemployed.

The Supplier shall respect human rights in accordance with Randstad's Human Rights Policy and in compliance with international treaties and regulations. The Supplier must be able to demonstrate that all of its products and/or services are manufactured without any violation of human rights. This includes, among other things, the rejection of child labor and compliance with employee rights (no forced labor, protection of health and safety, compliance with the Working Hours Act, no discrimination). Any form of non-compliance with human rights may result in termination of the Supplier relationship with Randstad.

### **Rejection of forced labor**

No forced labor, slave labor or comparable forms of labor shall be used. All work must be voluntary and without threat of punishment. Employees must be able to leave work or employment at any time. In addition, there shall be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment and humiliation. The commissioning or use of security forces must be refrained from if, during their use, persons are injured or treated in an inhumane or degrading manner or if freedom of association is affected.

### **Prohibition of child labor**

Child labor may not be used at any stage of production. Suppliers are required to adhere to the recommendation from the ILO conventions on the minimum age for employment of children. Accordingly, the age shall not be less than the age at which compulsory education ends under the law of the place of employment and in any case not less than 15 years. If children are encountered at work, the Supplier shall document the actions to be taken to remedy the situation and allow the children to attend school. The rights of young workers must be protected. Under the age of 18, they may not be used for work that is harmful to the health, safety or morals of children. Special protective regulations must be observed.

### **Fair remuneration**

The remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. Employees shall be provided with all benefits required by law. Payroll deductions as a penalty are not permitted. The Supplier shall ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

## **Fair working hours**

Working hours must comply with applicable laws.

## **Freedom of association**

The right of employees to form and join organizations of their choice and to bargain collectively and to strike shall be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of employees for the purpose of collective bargaining shall be provided. Employee representatives must be protected against discrimination. Employees may not be discriminated against on the basis of forming, joining or being a member of such an organization. They must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

## **Prohibition of discrimination**

Discrimination and unequal treatment of employees in any form is inadmissible unless it is justified by the requirements of employment. This applies, for example, to discrimination based on gender, race, ethnic or social origin, skin color, disability, health status, political conviction, origin, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual shall be respected.

## **Health protection, occupational safety**

The Supplier is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures shall be taken against accidents and damage to health that may arise in connection with the activity.

Excessive physical or mental fatigue must be prevented by taking appropriate measures. In addition, employees shall be regularly informed and trained on applicable health and safety standards and measures. Employees shall be provided with access to drinking water in sufficient quantities, as well as access to clean sanitary facilities.

## **Preservation of the natural resources**

The Supplier shall not, in violation of legitimate rights, take away land, forests or waters, the use of which secures the livelihood of individuals. The Supplier shall not modify soil in a harmful way, cause water and air pollution, noise emissions and excessive water consumption if this harms the health of individuals, significantly impairs the natural basis for the production of food or prevents access to safe drinking water or sanitary facilities.

## **Complaint mechanisms**

As part of the implementation of the German Supply Chain Act, Randstad has set up a complaints procedure through which both employees of the Randstad Group and external third parties / employees of Suppliers can file complaints. The complaints procedure can be found on our homepage at <https://www.randstad.de/fehlverhalten-melden/lieferkettensorgfaltspflichtengesetz/>. The Supplier shall inform its employees of this possibility in a suitable manner. The complaint procedure respects the confidentiality of identity.

## **7. Environment and ecological responsibility**

Recognizing that the world's natural resources are limited, Randstad has made environmental protection an important aspect of all its activities. Randstad therefore expects its Suppliers to comply with all applicable environmental laws and regulations.

In accordance with our Environmental Policy, Randstad strives to work with Suppliers who take specific action on a range of environmental issues. These include:

### Reduction of the carbon footprint

Suppliers shall strive to minimize the use of fossil fuels and minimize CO2 emissions by using energy from sustainable sources where possible. They have procedures in place to reduce consumption of natural resources, reuse materials, return recyclable waste products to recycling, limit business travel, and purchase recycled and environmentally friendly materials, depending on the Supplier's industry.

### Reduction of waste and water consumption

Within the scope of applicable legislation, Suppliers shall have a procedure for the safe separation, handling, storage, transport, use/reuse and disposal of waste, as well as for the sustainable use and reuse of water.

### Pollution prevention

Suppliers shall have clear pollution reduction targets and, where possible, use new technologies to this end.

As far as relevant for the respective business area, Suppliers shall fulfill their ecological responsibility in the following areas:

- treatment and discharge of industrial wastewater;
- handling air emissions;
- handling waste and hazardous substances;
- reduced consumption of raw materials and natural resources;
- dealing with energy consumption/efficiency.

As part of the Randstad Net Zero program, we reserve the right to include a commitment to measure and reduce CO2 emissions in a future Supplier Code of Conduct.

## **8. Ethical business conduct**

Suppliers undertake to comply with the OECD Guidelines for Multinational Enterprises, the BSCI Code of Conduct or the Global Compact.

This applies in particular to the following principles:

## **Fair competition**

The standards of fair business, fair advertising and fair competition shall be observed. In addition, the applicable antitrust laws must be complied with, which, in dealing with competitors, prohibit in particular agreements and other activities that influence prices or conditions. Furthermore, these regulations prohibit agreements between clients and Suppliers that are intended to restrict clients' freedom to determine their prices and other conditions autonomously when reselling.

## **Confidentiality / Data protection**

The Supplier undertakes to meet the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of personal information. The Supplier shall comply with the laws on data protection and information security and the official regulations when collecting, storing, processing, transmitting and disclosing personal information.

## **Intellectual property**

Intellectual property rights shall be respected; technology and know-how transfer shall be made in a way that protects intellectual property rights and client data.

## **9. Employees**

The Supplier must respect and enforce the ILO principles outlined. As outlined in our Health & Safety Policy, Randstad places the highest priority on health and safety in our company, for all of our employees (both internal and temporary). We expect the same from our Suppliers. In addition, the Supplier must ensure that employees of the Supplier who go to Randstad locations are informed about the contents of this Code of Conduct and the corporate rules (including environmental rules) applicable at Randstad. The Supplier's employees may be required to complete Randstad's compliance training program if deemed necessary by Randstad. The Supplier shall also be responsible for ensuring that its employees who work to fulfill the Supplier's services have the qualifications and knowledge required for the activity. If it is determined that a Supplier's employees are in violation of any aspect of the Code, the Supplier shall be notified and an action plan shall be agreed upon to ensure that compliance with the Code is quickly achieved.

## **10. Anti-bribery policy**

In accordance with our business principles, we do not offer, pay or accept bribes. Randstad declines gifts or entertainment that could create undue influence or the appearance of undue influence. Randstad has an active policy to prevent bribery and corruption (see also <https://www.randstad.com/about-randstad/corporate-governance/compliance/>). The Supplier must cooperate fully in the prevention of bribery and corruption and ensure that its employees and subcontractors do not commit any act in violation of local legislation and international treaties. Gifts or entertainment offered to Randstad employees, unless of negligible value, must be approved by the employee's manager. Any form of non-compliance with regard to bribery and corruption will be investigated and will not be tolerated. Failure to comply may result in termination of the Supplier relationship with Randstad.

In general, the highest standards of integrity must be applied to all business activities. The Supplier shall have a zero tolerance policy in prohibiting all and any forms of bribery, corruption, extortion and

embezzlement. Procedures for monitoring and enforcing standards shall be implemented to ensure compliance with anti-corruption laws.

## **11. Implementation of the requirements and control options**

We expect our Suppliers to identify risks within their supply chains and to take appropriate measures. In the event of suspected violations and to safeguard supply chains with increased risks, the Supplier will inform the company promptly and, if necessary, on a regular basis about the identified violations and risks as well as the measures taken.

Randstad shall verify compliance with the standards and regulations outlined in this document using a self-assessment questionnaire and, if necessary, risk-based audits at Supplier production sites. The Supplier agrees that Randstad may conduct such audits once a year or for a specific reason to verify compliance with the Code at the Supplier's premises during normal business hours after reasonable advance notice by persons appointed by Randstad. The Supplier may object to individual audit measures if these would violate mandatory data protection regulations.

If a violation of the regulations of this Code of Conduct is identified, then Randstad will immediately notify the Supplier in writing within one month and set a reasonable grace period for the Supplier to bring its conduct into compliance with these regulations. If the situation cannot be remedied in the foreseeable future, the Supplier must notify Randstad immediately and, together with Randstad, develop a concept and schedule for ending or minimizing the violation. If such a violation has occurred culpably, the grace period expires fruitlessly or the implementation of the measures described in the concept does not remedy the situation after expiry of the grace period, making it unreasonable for Randstad to continue the contract until proper termination, and if no milder means are available, Randstad may terminate the contract / business relationship and terminate all contracts after the fruitless expiry of the grace period set, if Randstad has threatened to do so when setting the grace period. A statutory right to extraordinary termination without notice, in particular in the case of violations that are deemed to be very serious, shall remain unaffected, as shall the right to claim damages.

This Code of Conduct shall apply as the basis for all future deliveries and services.  
By signing this document, the Supplier undertakes to act responsibly and to comply with the principles/requirements outlined.

The Supplier further undertakes to communicate the contents of this Code to employees, agents and subcontractors in a manner that is comprehensible to them and to take all necessary measures for the implementation of the requirements.

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Name Street Postcode City

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Date, signature