



misconduct reporting procedure

application

This policy applies to all employees of Randstad Sourceright (RSR) and Randstad Enterprise Group (REG). References in this procedure to Randstad are to RSR and REG.

summary

See Annex 1 for a summary of reporting options.

background

RSR and REG expect all employees, including directors and officers, to behave at all times in accordance with our core values and Business Principles. This means acting responsibly, with integrity, and in compliance with our policies and procedures, as well as applicable laws and regulations. We expect our employees to help us maintain our excellent reputation by adhering to the high standards reflected in our core values: to know, to serve, to trust, simultaneous promotion of all interests and striving for perfection.

RSR and REG promote a culture of openness and accountability, and encourages all stakeholders to speak up on any (suspected) ethical concerns, dilemmas, or other incidents where conduct falls short of our core values and/or the Business Principles (Misconduct). Speaking up is essential to enable us to protect our people, our company and values, our other stakeholders, and society as whole. However, as we understand that it takes courage to speak up, we want to offer you an easy and safe way to do so.

This Misconduct Reporting Procedure explains what your options are to raise your concern and/or to speak up on (suspected) Misconduct in confidence and without fear of retaliation.

how it works

We have established dedicated procedures set out in this document to ensure that any Stakeholder may raise concerns relating to Misconduct. Nevertheless, we understand that Misconduct may be reported informally through conversations with colleagues or managers and each employee is expected to be aware of what constitutes misconduct and to encourage the Stakeholder to make a report.



Good faith reports relating to Misconduct trigger protection for the reporting Stakeholder. Such reports will be treated in confidence (subject to the need to properly investigate and deal with the allegations, including permitting a right of reply) and we do not tolerate any form of retaliation for speaking up.

stakeholders

Our procedure is for any Stakeholder who wishes to speak up:

Stakeholder refers to anyone within or outside (with a relation to) the Randstad Group, and may include:

- corporate employees, incl. officers and directors, board members, and trainees
- talent, incl. temporary staffing employees, independent contractors, freelancers, and the self-employed
- former corporate employees and former talent employed by or through Randstad Group
- candidates and job seekers
- volunteers
- clients and suppliers, and their staff and subcontractors
- shareholders and investors

misconduct

This procedure applies to incidents of Misconduct. It should not be used for general issues relating to your employment relationship with Randstad or issues with Randstad services. In such cases, you should raise your concerns with your manager, HR department, local Randstad colleague or complaints line.

Examples of Misconduct (suspected or evidenced) that can be raised under this Misconduct Reporting Procedure include, for example, serious concerns related to:

- Randstad's core values, Business Principles, policies or procedures
- competition and antitrust laws and regulations
- discrimination and racism
- harassment and intimidation
- sexual harassment
- bribery and corruption
- other human rights principles (e.g., modern slavery/forced labor, child labor)
- health and safety failures and environmental issues
- fraud or misappropriation of company assets
- disclosure of confidential information, including personal data
- conflicts of interest
- criminal offences
- tax principles and policies



- failure to comply with obligations imposed by law or regulations (including incorrect finance, tax and accounting practices), including any breaches of European Union law

If you are unsure whether or not something constitutes Misconduct, please speak to your Local Integrity Officer or make a report. You will be contacted with feedback and we will let you know if it is being treated as a Misconduct report or refer you to a more appropriate channel.

where and how to speak up

We expect that any Stakeholder who witnesses or reasonably believes that Misconduct has occurred to report it.

In many cases involving minor incidents, it may be a good first step to speak to the person involved using the support of a trusted colleague or your manager. The person involved may not realise that their actions constituted potential Misconduct or there may be other mitigating factors of which you are not aware.

If you feel that this is not appropriate or you are uncomfortable doing so, you can make a formal report.

Due to the global structure of RSR and REG, we offer a variety of reporting channels. In all cases, the Global Integrity Officer will be notified although investigation may be delegated to local colleagues for language reasons or to ensure compliance with local HR processes.

your manager, HR representative, legal counsel or risk & audit

As a general guideline, the first person to approach when raising a concern is your direct manager (or employees), your consultant or their manager (for talent), or your regular business contact (other external stakeholders). You may also choose, depending on the nature of the concern, to discuss the matter with your HR representative, legal counsel, risk & audit, or other trusted party (e.g., ombudsman, confidant) in the organization. They may be able to help, mediate or guide you to the best function to address your concern. Speaking to management is usually the fastest and preferred route, and the best way to ensure a good and open work environment throughout Randstad.

the Local Integrity Officer

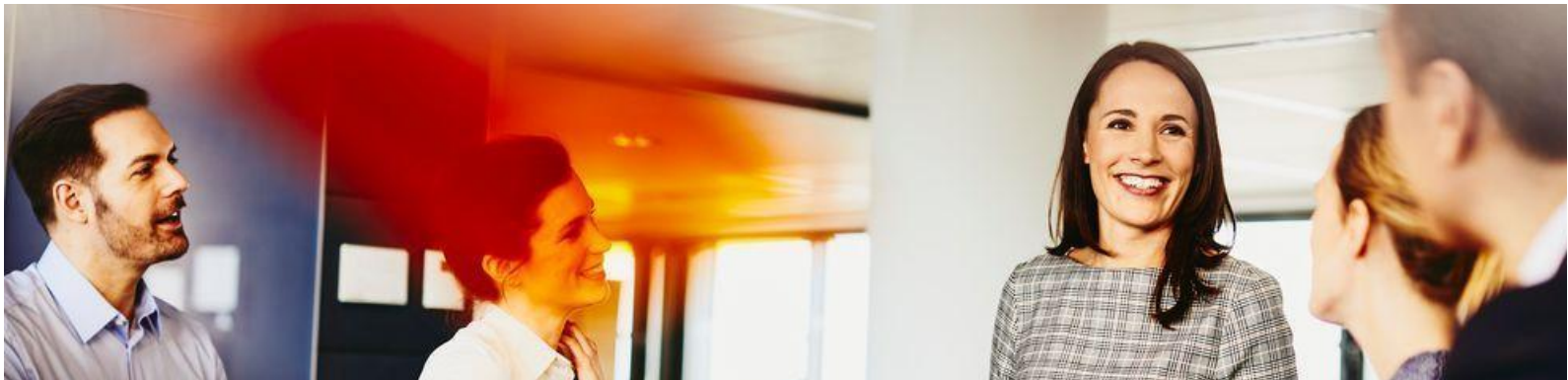
The Local Integrity Officer is the impartial person aligned to a country, region or business unit who ensures that all reports of Misconduct are assessed and dealt with in a lawful and timely manner.

For RSR EMEA, the Local Integrity Officer is Sally Beeken (sally.beeken@randstad.co.uk)

For RSR in APAC, you should refer to your country level procedure.

For RSR in North America, you should refer to your country level procedure.

For REG employees including global functions, the Local Integrity Officer is Robin Fisher (robin.fisher@randstad.com).



the Global Integrity Officer

RSR and REG have appointed Robin Fisher (robin.fisher@randstad.com) as the Global Integrity Officer. The purpose of this role is to coordinate misconduct reporting within RSR and REG and to have an overview of all reports relating to RSR and REG irrespective of how and where they were raised.

the Central Integrity Officer

The Central Integrity Officer is the impartial person or function appointed by the Randstad N.V. Executive Board to coordinate integrity issues under this procedure, and to provide regular reports to the Executive Board and annually to the Audit Committee of the Supervisory Board on cases reported via the Integrity Line or directly to the Local Integrity Officers and Central Integrity Officer.

The Central Integrity Officer ensures that any reports under this procedure on suspected Misconduct by one or more members of the management team of a Randstad Group company are reviewed centrally.

You may reach out to the Central Integrity officer by email (complianceofficer@randstad.com), or send a letter to Central Integrity Officer, Randstad N.V., P.O. Box 12600, 1100 AP Amsterdam-Zuidoost, The Netherlands.

If the suspected Misconduct involves members of the senior management team within RSR or REG, you may choose to contact the Central Integrity Officer at Randstad NV.

the Integrity Line (Speak Up facility)

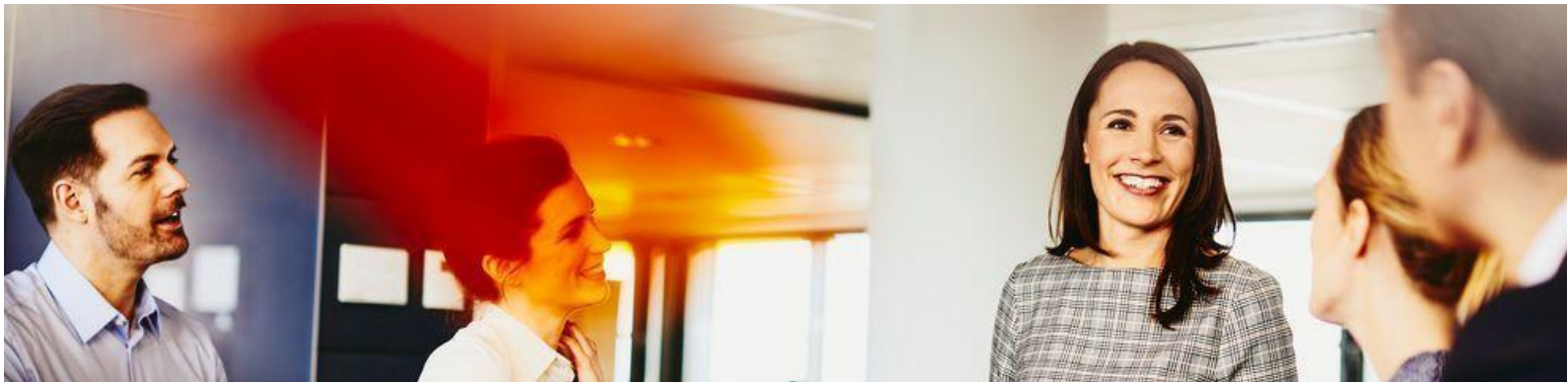
If you suspect or have witnessed Misconduct that cannot be reported via the regular reporting channels, you can speak up via the Integrity Line.

Reports can be submitted through the Integrity Line in the local language or in English, either online or orally (by phone). The Integrity Line consists of a secure webpage and a telephone hotline, accessible 24 hours a day via free local access numbers. Both are operated by an independent external provider. Although reports may also be submitted anonymously, Randstad encourages you to tell us who you are when you speak up, as this greatly facilitates the investigation of the report.

For full details of the facility and access, please see [Annex 2 to the global Misconduct Reporting Procedure](#).

local reporting

The Whistleblowing Directive requires companies to provide an option for employees to make a report in their local jurisdiction. To do this, you may use the Integrity Line local country option, full details of which are found in the link above.



external reporting

For employees based in the European Union, you have the option to report misconduct to an external authority, details of which can be found in your local misconduct reporting procedure.

Be aware that reporting externally can be impactful for the company and you. RSR is committed to the fair investigation of reports of misconduct and is fully committed to the principle of no retaliation. Reports are investigated under the supervision of a UK-qualified solicitor with a professional commitment to independence from the company.

anonymous reporting

If you want to report anonymously, we strongly advise that you report through the Integrity Line. This allows us to handle your report of potential Misconduct in the most efficient way, helps to minimize unreliable and false reports, best protects the privacy of everyone involved, and enables the Local Integrity Officer and/or Central Integrity Officer to communicate efficiently with you.

Randstad does not need to know who you are, but using the Integrity Line makes safe dialogue possible.

When speaking up anonymously, please make sure to provide sufficient details in order to allow your concern to be addressed. Anonymous reports that do not include sufficient details cannot be investigated.

what to include when you report

Randstad values any report made in good faith, whether anonymous or not. However, in order to be able to assess the merit of the report and decide on how to follow up, the Local Integrity Officer needs as much detail as possible.

Consider the following aspects when you speak up:

- what happened?
- who is involved - who did what and were there any witnesses?
- when did it happen?
- where did it happen?
- how did it happen - what means or methods were used?
- if you know, why did it happen?

We also encourage you to share any evidence, document, reference, photo, or any other relevant information that may assist us in assessing the report in a more efficient manner. If you do not have such evidence, any reference or recommendation of where to look for such material will be helpful.

You may not be able to address all aspects, but the more information we have, the better we can assess and follow up. When you report via the Integrity Line, the Local Integrity Officer



and/Central Integrity Officer may reach out to you (also via the Integrity Line) with further questions.

handling Misconduct reports

Where a report is made, it will be assessed by the Integrity Officer and if this procedure is engaged (i.e. the reported behaviour meets the definition of Misconduct), the following sections apply.

initial assessment and response

The Local Integrity Officer will confirm to you the receipt of your report, received directly or through the Integrity Line, within seven days of receipt. If further information is required to qualify the report, this will be addressed in the response message.

the investigation and feedback

The Local Integrity Officer ensures that all reported cases of potential Misconduct are investigated and dealt with in a lawful and timely manner, while respecting the rights of all individuals involved, in accordance with Randstad's investigation procedure.

In certain instances such cases may be referred to and handled by a local management representative and/or other relevant functions of the company, depending on the nature of the report. In these cases, the same practices with regard to, for example, confidentiality, non-retaliation and timeframes still apply.

After due assessment, the Local Integrity Officer may decide not to investigate a report if, for example:

- there is insufficient information for a fair investigation and it is not possible to obtain further information;
- there is a clear indication that the report was not based on merit, but was made in bad faith and with the mere intention to harm individuals or the company rather than to address Misconduct.

During the investigation, the Local Integrity Officer or other relevant function involved in the investigation may also reach out to you (via the Integrity Line or, when possible, directly) for further clarification.

At the latest three months from the acknowledgement of receipt, the Local Integrity Officer will provide feedback. If the investigation is not yet concluded at that time, further feedback will be provided again at a later moment. Please note that it is not always possible to share the details of the progress or outcome of the investigation for reasons of confidentiality, privacy and the legal rights of the parties involved. All parties are entitled to confidentiality, including the accused. Therefore, if you participate in or learn about an investigation, you must also keep the matter confidential.

If the potential Misconduct involves one or more members of the local management team of a Randstad Group company, the Local Integrity Officer will redirect the report to the Central Integrity Officer. The Central Integrity Officer may inform local management and will inform the responsible



member of the Randstad N.V. Executive Board and/or the Audit Committee of the Supervisory Board, subject to confidentiality and there being no potential conflict of interest.

Reports that relate to one or more members of the Randstad N.V. Executive Board or Supervisory Board will be handled by the Randstad N.V. Local Integrity Officer, who is a member of the Supervisory Board.

conclusions and actions taken

After the investigation is concluded, prompt and appropriate corrective action will be taken when and as warranted in the judgment of the relevant management level, taking into account the relevant company functions (e.g., HR, Legal).

Corrective action in the event of proven Misconduct may vary from a written warning, coaching, and/or apologies to those affected by the Misconduct through to the suspension or termination of the contract of or relationship with those responsible for the Misconduct, reporting to the appropriate authorities, and/or any other action relevant to the specific Misconduct.

protecting you and your right to speak up

Protecting your right to speak up on potential Misconduct is essential. One of the main purposes of this procedure is exactly that. This protection applies when you have reasonable grounds to believe that the information you report is true at the time of reporting, and this information constitutes Misconduct. Below, some key principles are highlighted.

confidentiality

All concerns raised via the Integrity Line or with the Local Integrity Officer directly are treated as confidential to the maximum extent, including your identity, consistent with the need to conduct an investigation (and, if necessary, take appropriate action). This also applies to anyone assisting you when speaking up in a work-related context.

Exceptions to confidentiality are possible when Randstad is under a legal or regulatory obligation to disclose the information, or if the report is made in bad faith. Information will only be shared with a limited number of authorized people directly involved in the investigation on a strict need-to-know basis. This may include external advisors involved in an investigation. Your identity and other information from which your identity may be deduced will not be disclosed to anyone beyond these people without your explicit consent. Depending on the purpose of sharing, the Local Integrity Officer will (further) anonymize the information prior to sharing it.

In principle, we are obliged to inform any person under investigation that he or she is the subject of an allegation of potential Misconduct. This notification may be delayed if there is a substantial risk that this jeopardizes the investigation or the gathering of evidence. Also in this case your identity will not be disclosed.

When you speak up in accordance with this procedure, Randstad is committed to treating your report seriously and with care. Randstad expects that you treat it in the same manner. This does not restrict you from reporting externally or publicly where this is possible under local law, or from seeking (legal) advice in relation to your reporting.



privacy/data protection

Any personal data obtained as part of any report and investigation under this procedure (including of the person speaking up, any person under investigation, and any witnesses) will only be used for the purposes described in this procedure and in accordance with relevant data protection laws and Randstad's data protection policy.

Personal data that is clearly not relevant for handling of a specific report shall be deleted without undue delay. Personal data on the Integrity Line will be deleted by the Local Integrity Officer three months after a case is closed. Personal data collected as part of an investigation may be retained for a longer period if this is required due to the nature of the allegations and/or investigation up to the maximum statutory limitation period for the relevant country, but no longer than is necessary and proportionate.

Personal data will only be shared with those who need to know and will be subject to an obligation of confidentiality to the extent possible and as consistent with the need to conduct an investigation and, if necessary, take appropriate action.

Exceptions are possible if Randstad is under a legal or regulatory obligation to disclose the information or if the report is made in bad faith.

non-retaliation

We encourage speaking up, and any person who speaks up will be protected from any form of threat or retaliation, provided that the reporting person has reasonable grounds to believe that the information on the potential Misconduct reported is true at the time of the report. You will not be blamed or held liable when you report in good faith and in accordance with this procedure.

Randstad will not retaliate against anyone reporting potential Misconduct. For example, Randstad will not discharge, demote, suspend, threaten, harass, or in any manner discriminate against anyone reporting potential Misconduct. This also applies to the person who assists the person speaking up in a work-related context. The right of non-retaliation is guaranteed under the Business Principles, and violation of this right will not be tolerated. Any form of threat or retaliation aimed at speaking up may lead to disciplinary measures.

If you notice or experience any threat or retaliation, you can report this via the Integrity Line or directly to the Central Integrity officer. When you speak up in accordance with this procedure on Misconduct in which you have participated yourself, Randstad will consider taking this into account as a mitigating factor when assessing the consequences of such Misconduct.

exception: reporting in bad faith

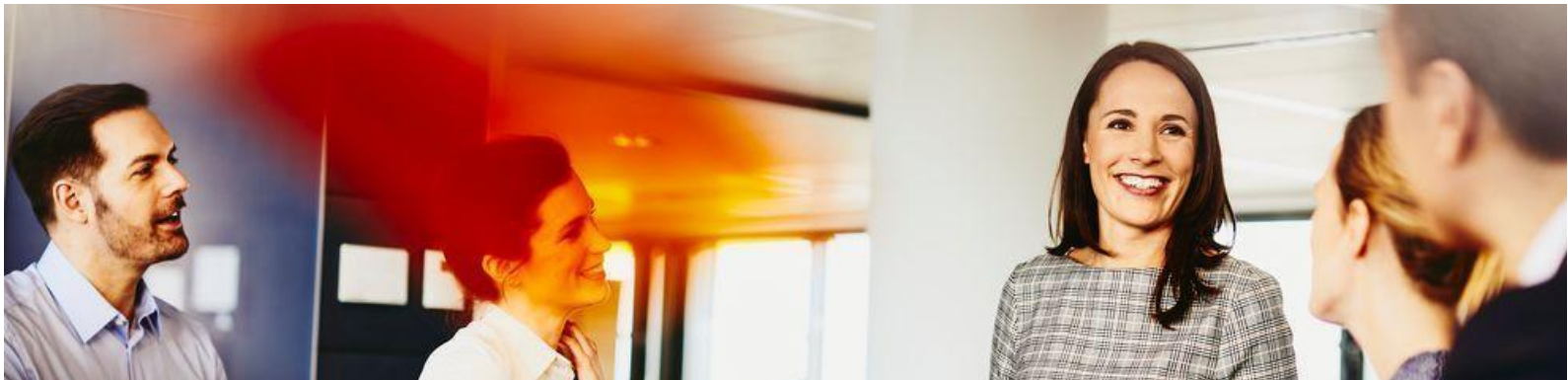
Reports are considered to have been made in bad faith if the reporting person knows, at the moment of reporting, that the allegation made is not true. This could be the case, for instance, when this procedure is abused (a) because of personal grievances, (b) for personal benefit, or (c) to intentionally harm the Randstad Group or any of its employees, including officers and directors. The Randstad Group sees reporting in bad faith as a very serious violation of our Business Principles. If appropriate, the Randstad Group may take further action (including disciplinary action) against anyone who knowingly makes a report in bad faith.



protecting the subject of an investigation

A person subject to an investigation into a potential Misconduct is also entitled to protection. The presumption of innocence is a leading principle. The Local Integrity Officer is responsible for monitoring and managing this procedure, also towards anyone who is accused of – or otherwise involved in – any potential Misconduct.

The person under investigation of a potential Misconduct will normally be notified of this fact within a reasonable timeframe, depending on the facts and circumstances and whether there is a perceived risk of destruction of evidence, retaliation and/or obstruction of the investigation. All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis. The person under investigation has the right to respond to the allegations and can appeal against any adverse findings or decisions.



annex 1 - summary of reporting options

You have a variety of reporting options available to you as an employee of RSR and REG.

<p>Speak to the person involved</p>		<p>minor incidents of misconduct may be resolved by addressing it directly with the other person, supported by a colleague or your manager</p>
<p>refer to a trusted colleague or confidante</p>		<p>you can engage with your manager, a colleague from HR, legal or risk & audit</p> <p>RSR EMEA Trusted Confidantes</p>
<p>local or central integrity officer</p>		<p>for serious Misconduct which will be investigated in accordance with this procedure</p> <p>RSR EMEA - sally.beeken@randstad.co.uk RSR APAC / NAM - refer to local procedure RSR/REG Global - robin.fisher@randstad.com Randstad NV - complianceofficer@randstad.com</p>
<p>SpeakUp / Integrity Line</p>		<p>permits anonymous reporting for serious Misconduct. To enable an effective investigation, please provide as much information as possible</p> <p>SpeakUp Details</p>
<p>local in-country reporting</p>		<p>Refer to SpeakUp Details.</p>
<p>local external reporting</p>		<p>See country level misconduct reporting procedure</p>