

ESG & SUSTAINABILITY POLICIES



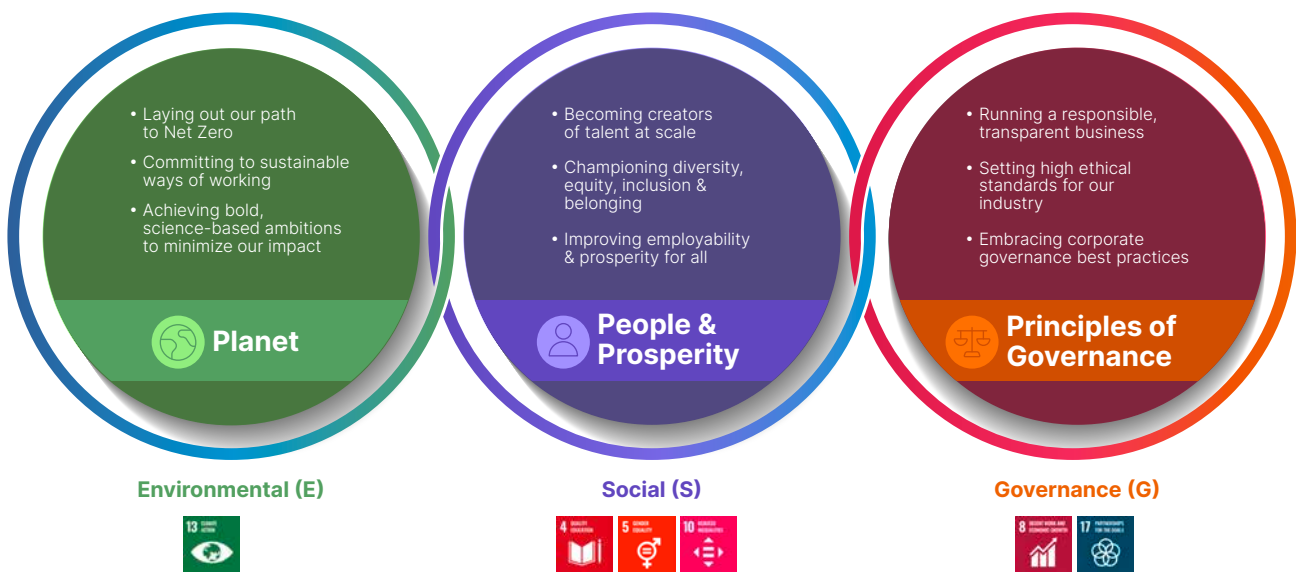
ESG & SUSTAINABILITY POLICIES

For 75 years, we have been convinced that access to sustainable, quality employment has the power to change the world.

Our sustainability plan (**Working to Change the World**) addresses the challenges of the world of work through three priorities (ESG), focusing on the areas where we have the most impact:

- > **Planet**, responding to the climate emergency;
- > **People and Prosperity**, placing talent at the heart of our approach;
- > **Principles of Governance**, setting high ethical standards.

OUR WORKING TO CHANGE THE WORLD PLAN



There are various **policies** behind our sustainability plan:

- ESG & Sustainability Policy
- Human Rights Policy
- Health, Safety and Well-being Policy
- Non-Discrimination/Diversity/Equity/Inclusion/Belonging (DEIB) Policy
- Policy on the fight against all forms of modern slavery
- Anti-Corruption Policy
- Policy on Gifts, Entertainment and Sponsorships
- Environmental Policy
- Social Dialogue Policy
- Information Security Policy
- Supply Chain Business Partner Policy

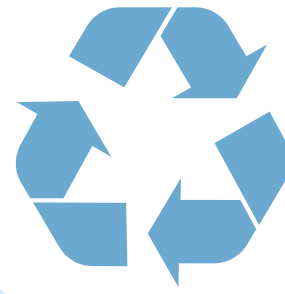
ESG & SUSTAINABILITY POLICIES

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ESG/SUSTAINABILITY

ESG & SUSTAINABILITY POLICIES

ESG & SUSTAINABILITY POLICY (Environnement - Social - Gouvernance)

“Doing Well By Doing Good”

OUR VISION AND SUSTAINABILITY PLAN

At ManpowerGroup, we want to make a positive contribution to society by making the world of work better.

Founded 75 years ago to help people find meaningful work, ManpowerGroup still embodies the principle of **“Doing Well By Doing Good”** that back in 1948 inspired our founder Elmer Winter. We remain committed to this **dual objective**: generating profit for our shareholders and creating value for all our stakeholders, employees, temporary workers and associates, candidates, customers, suppliers, partners, communities and for wider society.

Today, our work in the labour market is based on this founding principle and on the ManpowerGroup values (“People, Knowledge, Innovation”): **We believe meaningful and sustainable employment has the power to change the world.**

Our **sustainability plan (“Working to Change the World”)** addresses the challenges of the world of work through three priorities (ESG), focusing on the areas where we have the most impact:

> **Planet**, responding to the climate emergency;

> **People and Prosperity**, placing talent at the heart of our approach;

> **The Principles of Governance**, setting high ethical standards.



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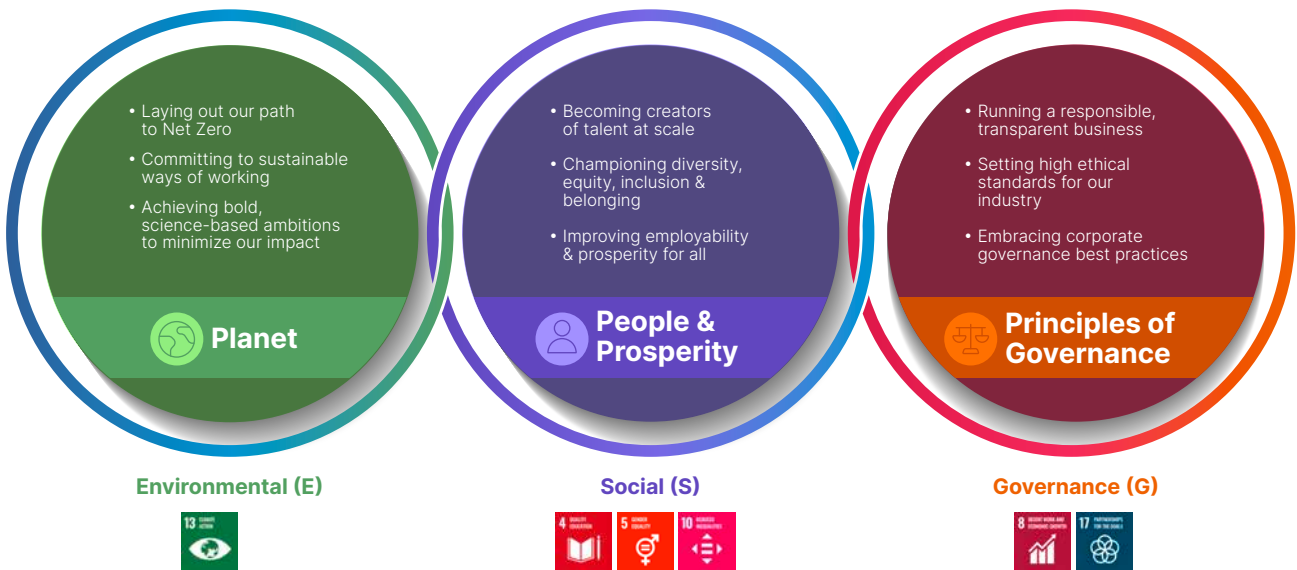


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OUR WORKING TO CHANGE THE WORLD PLAN



Our plan supports the **UN Sustainable Development Goals** where we can have the greatest impact: **Goal 4 (Quality education)**, **Goal 5 (Gender equality)**, **Goal 8 (Decent work and economic growth)**, **Goal 10 (Reduced inequalities)**, **Goal 13 (Climate Action)** and **Goal 17 (Partnerships for the Goals)**.

OUR ACTION ON THE LABOUR MARKET

ManpowerGroup has a dual mission:

- > **Helping every person to build their own career path** so that they can, directly or indirectly, have access to sustainable employment.
- > **Providing companies with access to talent, skills and capabilities**, combating discrimination and promoting diversity, equity, inclusion and belonging (DEIB).

ManpowerGroup Belgium's **social responsibility** and sustainability approach are a natural extension of our historical **values** (People - Knowledge - Innovation). We operate in a professional manner with high standards in the areas of quality, ethics and sustainability. Because we are aware of the importance of work in people's lives, we pursue **innovative human resources policies** that enable our employees to fulfil our mission in a successful way and to fulfil their role as experts in the labour market, to develop and to have fulfilling careers.

Various **commitments** support our sustainability plan:

- > **Human Rights Policy**
- > **Health, Safety and Well-being Policy**
- > **Non-Discrimination/Diversity/Equity/Inclusion/Belonging Policy (DEIB)**
- > **Policy on the fight against all forms of modern slavery**
- > **Anti-Corruption Policy**
- > **Policy on Gifts, Entertainment and Sponsorships**
- > **Environmental Policy**
- > **Social Dialogue Policy**
- > **Information Security Policy**
- > **Supply Chain Business Partner Policy**

Our **Sustainability Manual** sets out our vision, objectives and procedures for updating our plan. The manual, as well as the related Performance Indicators published in our **ESG & Sustainability Reports**, is audited by **EcoVadis**, the world's most trusted business sustainability ratings. EcoVadis assesses the ethical, social and environmental performance of suppliers.

Our vision, sustainability plan and policies are included in our **Code of Business Conduct and Ethics**, and all ManpowerGroup staff are trained and certified annually.

At ManpowerGroup BeLux, we are proud of who we are, what we believe in and how we reflect our values in all aspects of our business for the benefit of all our stakeholders.



Sébastien Delfosse

Managing Director ManpowerGroup BeLux

A modern office interior with large windows and a group of people in a meeting. The scene is brightly lit, suggesting a sunny day. In the foreground, a man in a white shirt is seated at a table, looking towards the right. In the background, a group of four people (three women and one man) are seated around a table, engaged in a discussion. The office has a clean, professional look with a mix of wood and metal accents.

MANPOWERGROUP

Human Rights Policy



“As a signatory to the United Nations Global Compact, ManpowerGroup is committed to respecting internationally proclaimed human rights, and to making these principles a part of our culture, strategy and day-to-day operations.”

Jonas Prising, Chairman & CEO



Purpose

We believe that meaningful and sustainable work has the power to change the world.

Our Values are unwavering. People come first, and work is important in their lives. We trust, respect and provide opportunities for all, transforming people’s lives with jobs today and guiding them to jobs of tomorrow.

Our global reach, working with hundreds of thousands of organizations around the world, means we can influence the way people are treated across complex multinational supply chains. By respecting and promoting internationally declared [Fundamental Principles and Rights at Work](#), we can help ensure that work is a source of dignity and purpose.

We use our industry leadership to advocate for ethical recruitment practices, employment flexibility balanced with security, and opportunities for under-represented and vulnerable populations to develop in-demand skills and participate in the formal economy.

Policies and Principles

Our policy is straightforward: We expect ManpowerGroup employees and business partners to conduct business in a manner that respects Fundamental Principles and Rights at Work. We have a responsibility to comply with all applicable laws in the countries where we do business. Where differences exist between local laws and our standards, the higher standard will prevail.

We Have Zero Tolerance Toward Forced Labor and Modern Slavery

Forced labor (also known as modern slavery) occurs when individuals are coerced to work under threat of penalty, including violence, threats, intimidation, retention of identity papers, restricting freedom of movement, or manipulated debts. Requiring unreasonable working hours or paying workers less than minimum wage can also be considered modern slavery.

ManpowerGroup will not make use of any form of forced labor, including bonded, indentured or prison labor and we will not knowingly do business with any entity that benefits in any way from these practices.

We do not charge fees to candidates or jobseekers for services related to temporary or direct placements. All employment is voluntary, and we will not penalize or restrict the freedom of employees or associates to leave employment upon reasonable notice.

We will ensure that mandated working hours are reasonable and ensure fair and equitable compensation for time worked, in accordance with all applicable laws and regulations.

We Will Not Tolerate Racism, Discrimination or Harassment

We commit to fairness in the hiring and advancement of people regardless of differences of race, ethnicity, national origin, religion, cultural background, gender, age, disability, caste, marital status, union membership, political affiliation, pregnancy, health, sexual orientation, gender identity, or any other group protected under local law. We embrace individual differences in a spirit of inclusiveness that welcomes all people and seeks to provide them with the opportunity to unleash their potential.

We all share responsibility for maintaining safe and respectful work environments, free from unprofessional or abusive conduct of any type. We will not tolerate verbal, nonverbal or physical conduct by anyone associated with our business (including business partners) that harasses or creates an intimidating, offensive, abusive or hostile work environment, including any workplace violence, racism or sexual harassment.

All ManpowerGroup employees are required to comply with all anti-harassment and non-discrimination laws in the locations where they work.

We Support the Right to Freedom of Association and Collective Bargaining

We respect the right of employees to form and join organizations of their own choosing, and to engage in collective bargaining. We will not interfere with or seek to control employee representative organizations, will cooperate in good faith with fairly elected representatives, and will comply fully with the terms of collective bargaining agreements within appropriate national legal frameworks.

In accordance with our [industry code of conduct](#), we will not make workers available to client companies to replace employees of that company who are legally on strike.

We Protect the Rights of Children and Young Workers and Do Not Engage in Child Labor

ILO conventions define “child” as a person under 18 years of age and “young worker” as under the age of 18 but above the minimum age for employment. “Child labor” refers to work that is dangerous or harmful to children and interferes with their education.

As a rule, we do not employ individuals under the legal minimum working age, or under the age of 15, whichever is higher. We maintain appropriate procedures to verify age and eligibility to work at the time of employment. We will not knowingly place young workers in jobs that could compromise their health, welfare or mandatory education.

We are committed to ensuring that young people have opportunities to develop skills and work experience, so they are ready to enter the labor force when they leave education. We partner with public and private sector organizations to offer appropriate internships, apprenticeships and other world of work orientation experiences.

Roles and Responsibilities

This policy applies to everyone, including employees, associates, officers of ManpowerGroup and its subsidiaries, members of the Board of Directors of ManpowerGroup and others who perform services for us, as well as the clients, candidates and jobseekers we serve.

Employees

ManpowerGroup employees have a responsibility to read, understand, and comply with this policy. The policy will be provided to new employees during onboarding, and key concepts are reinforced during annual [Code of Business Conduct and Ethics](#) training.

We encourage employees to seek guidance from a manager or compliance officer when uncertain, and promptly report concerns or suspected violations.

Leadership

Oversight of the policy resides with ManpowerGroup's General Counsel.

ManpowerGroup leaders are responsible for establishing appropriate processes and controls to prevent violations and ensure compliance with this policy. Leaders and managers should encourage open and ongoing communications between themselves and their employees, as well as provide a positive role model for those we lead.

Business Partners

We expect that our third-party partners (including suppliers, consultants, agents, joint venture partners, or any other third party acting on our behalf) and clients (collectively referred to as "business partners") adhere to the standards as described in this policy.

ManpowerGroup can be held responsible for the conduct of a business partner. Due diligence should consider the reputation and integrity of a proposed business partner, as well as the extent of their internal controls to prevent human rights violations.

Our responsibilities do not stop once an agreement has been signed, and we must monitor the ongoing activities of our business partners. We encourage employees to share this policy with business partners so they are aware of our standards.

Associates, Candidates and Jobseekers

ManpowerGroup seeks to protect associates, candidates and jobseekers from human rights violations. In turn, we expect these individuals to respect our standards and promptly report concerns or suspected violations.



Risk and Impact Assessment

We will complete periodic global risk and impact assessments, evaluate existing processes and controls to prevent human rights violations and identify opportunities for continuous improvement.

ManpowerGroup operations in specific countries may perform additional procedures or issue additional guidelines to conform to local laws or to address local circumstances. Any additional, country-specific guidelines must be consistent with this policy. No violation of federal, state, or foreign laws will be permitted or tolerated.

Reporting and Non-Retaliation

Any person who becomes aware or suspects that this policy may have been violated shall immediately report their concern to their manager or supervisor, local compliance officer, the Global Ethics Compliance Officer or General Counsel's Office, or through the [ManpowerGroup Business Ethics Hotline](#).

The identity of any person reporting a suspected or actual violation will remain confidential, except to the extent necessary for the protection of ManpowerGroup's interests or as required by applicable law.

ManpowerGroup will not tolerate retaliation against anyone who makes a report in good faith, as stated in the [ManpowerGroup Anti-Retaliation Policy](#). Anyone who experiences what they believe to be any form of retaliation should report this concern as soon as possible to the General Counsel or the Global Ethics Compliance Officer.





Remediation

Should any situation arise where it is determined that individuals' rights have been violated, either through our own practices or those of our business partners, we will take the necessary steps to stop the practice and mitigate the impact to the greatest extent possible.

Disciplinary Action

Employees who violate this policy are subject to disciplinary action, up to and including dismissal and may also be subject to individual criminal and/or civil prosecution in relevant jurisdictions. Business partners who violate this policy are subject to termination of all commercial relationships with ManpowerGroup.

Additional Resources

- ✓ [ILO Declaration on Fundamental Principles and Rights at Work](#)
- ✓ [United Nations Global Compact Principles](#)
- ✓ [World Employment Confederation Code of Conduct](#)
- ✓ [ManpowerGroup Code of Business Conduct and Ethics](#)
- ✓ [ManpowerGroup Supply Chain Business Partner Policy and Supplier Code of Conduct](#)



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ESG/SUSTAINABILITY

HEALTH, SAFETY AND WELL-BEING

HEALTH, SAFETY AND WELL-BEING POLICY

“Safety, health and well-being is everyone’s concern.”

As a key player in the world of work, ManpowerGroup Belux sees preventing occupational risks an absolute priority. When it comes to a responsibility to the life, health and well-being of our permanent, temporary and contract employees, we are uncompromising and expect everyone to be involved. Our policy on prevention, safety and health at work is based on three major objectives:

- Preserving the physical and psychological integrity of our employees;
- Reducing the number of accidents at work and work-related illnesses;
- Improving working conditions to promote professional well-being.

This is why we are developing expertise, actions and dedicated resources to reduce occupational risks. Organized around a central structure that defines the prevention and safety policy, we deploy prevention projects across our network of branches and the various ManpowerGroup brands. Our actions are part of a continuous improvement process and based on the following guiding principles:

- Regularly identifying of the risks involved;
- Complying with legislation on safety, health and well-being at work;
- Implementing and monitoring of action plans at each level of the hierarchy;
- A strong partnership with our customers;
- Analysing of accidents at work in-depth;
- Regularly reviewing and implementing corrective actions;
- Monitoring of indicators and evaluation of progress;
- Consulting of employees and their representative bodies;
- Raising awareness and training employees throughout their career.

This policy is included in our Code of Business Conduct and Ethics, and all ManpowerGroup staff are trained and certified annually. By integrating prevention into its daily practices, ManpowerGroup strengthens its social, economic and human values. This policy shows ManpowerGroup’s commitment to all the people and stakeholders working with and at ManpowerGroup.

Sébastien Delfosse

Managing Director ManpowerGroup BeLux

ManpowerGroup BeLux
PR/11/2/ENG - 01/06/2023



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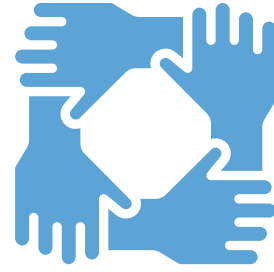
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ESG/SUSTAINABILITY

DIVERSITY, EQUITY, INCLUSION,
BELONGING (DEIB)

NON DISCRIMINATION/ DIVERSITY, EQUITY, INCLUSION, BELONGING POLICY (DEIB)

“We want to create a world of work where there is space for everyone. ”

THE DNA OF MANPOWERGROUP

Since the creation of the ManpowerGroup in 1948, our mission in the labour market has been based on the belief that every individual should be able to develop their potential and gain access to meaningful and sustainable jobs. Based on our values, we are committed to doing everything in our power to combat all forms of discrimination and to strengthen **diversity, equity, inclusion and belonging** (DEIB) within our company, among our customers and within the communities in which we live and operate. We want to create a world of work where everyone has a place.

We are convinced that an **HR strategy** that takes the ‘**DEIB**’ dimensions into account is essential not only for attracting, developing and retaining talent, but also for strengthening the commitment, fulfilment and happiness at work for each individual. At ManpowerGroup, our human resources work, particularly our recruitment and talent management processes, are based on these principles.

NON-DISCRIMINATION/DIVERSITY

We believe that the strength of a group lies in its differences rather than in its similarities.

In its work, ManpowerGroup is committed to ensuring that all stakeholders (employees, permanent staff, temporary staff, clients, etc.) act in accordance with anti-discrimination laws and in particular the 19 so-called “protected characteristics”.

We want to promote diversity and the integration of everyone in the labour market and at ManpowerGroup **without distinction**:



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Alleged race	Sexual orientation	The birth
Disability	Health	Social background
Political beliefs	Ancestry	Gender
Skin colour	Age	Language
Philosophical or religious beliefs	Physical or genetic characteristics	Civil status
Trade union beliefs	National or ethnic origin	
Nationality	Financial resources	

(*) Anti-Discrimination Act (Gender Act - Racism Act - Act defining the protected characteristics), 2007

EQUITY

We want to ensure **equal opportunities** for everyone by providing equal access to opportunities and benefits without distinction. **We act in a spirit of fairness, impartiality and equity** by providing everyone with individualised support in their career development, through continuous training, or by rewarding performance transparently.

INCLUSION

We want the working environment to evolve to **fully include and value each individual by promoting diversity of cultures, backgrounds and ways of thinking**. We work for and with everyone, everywhere. We also believe that inclusion boosts the creativity and performance of individuals and teams.

BELONGING

We want to create a culture where everyone can be themselves and be fully recognised, every day. We stimulate open communication, based on respect and openness and the participation of everyone. This way, we **strengthen the sense of belonging** at all levels of our company.

OUR COMMITMENT

ManpowerGroup is committed to combating all forms of discrimination and promoting diversity, equity, inclusion and belonging (DEIB), based on three principles:

- **Equal opportunities:** to be accessible to everyone;
- **Equal treatment:** to ensure that everyone is treated equally in their career development (employment, promotion, training, etc.);
- **Societal commitment:** being an actor of change in the labour market (action, partnership, innovation, awareness raising, communication).

This policy is included in our **Code of Business Conduct and Ethics**, and all ManpowerGroup staff are trained and certified annually.

Together with everyone at ManpowerGroup, we are proud of working together with all our stakeholders making the world of work more diverse, fair and inclusive.



Sébastien Delfosse

Managing Director ManpowerGroup BeLux



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ESG/SUSTAINABILITY

POLICY AGAINST MODERN SLAVERY

POLICY ON THE FIGHT AGAINST ALL FORMS OF MODERN SLAVERY

“Prohibit all relations with actors closely or remotely involved with slavery”

One long-standing commitment and fundamental value in the Group's Code of Ethics and Professional Conduct, ManpowerGroup BeLux prohibits any economic relationship with actors that are in any way involved in human trafficking or any form of modern slavery. Without compromise, this principle applies to all of ManpowerGroup BeLux's activities.

Under Article 4 of the European Convention on Human Rights, “no one shall be held in slavery or servitude”. That means that human trafficking and modern slavery are offences that are strictly regulated and sanctioned under the Belgian Criminal Code⁽¹⁾.

HUMAN TRAFFICKING is the recruitment, transportation, transfer, harbouring or receipt of a person for the purpose of exploitation in any of the following circumstances:

- Using threats, coercion, violence or deception against the victim, their family or a person in a regular relationship with the victim, or
- by a legitimate, natural or adoptive ascendant of that person or by a person who holds authority over them or abuses the authority conferred to them by their functions, or
- by abusing a position of vulnerability due to age, illness, infirmity, physical or mental deficiency or pregnancy, apparent or known to the perpetrator, or
- in exchange for or by the granting of a remuneration or any other benefit or promise of remuneration or benefit.

SLAVERY is the exercise of the attributes of property rights against a person.

EXPLOITATION OF A SLAVED PERSON is the act of committing a sexual assault on a person, whose enslavement is apparent or known to the perpetrator, or of confining or subjecting them to forced labour or forced service.

(1) Art. 433(5) to 433(8) of the Penal Code



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FORCED LABOUR is the act, by violence or threat, of compelling a person to perform work without remuneration or in exchange for remuneration that is clearly not in line with the importance of the work performed.

FREE OR LOW-COST WORK also constitutes modern slavery and is characterised by the fact of obtaining from a person “whose vulnerability or state of dependence is apparent or known to the perpetrator”, the provision of unpaid services or in exchange for remuneration that is clearly unrelated to the importance of the work performed.

There are many forms of human trafficking and slavery such as debt bondage, forced labour, sexual slavery, forced marriage, traditional slavery, free or low-paid labour and exorbitant child labour.

All ManpowerGroup BeLux employees are asked to report any forms of slavery or human trafficking (as described above) that they may encounter in the course of their duties to their line managers.

This policy is included in our Code of Business Conduct and Ethics, and all ManpowerGroup staff are trained and certified annually.



Sébastien Delfosse

Managing Director ManpowerGroup BeLux

MANPOWERGROUP

Anti-Corruption Policy



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A MESSAGE FROM

OUR CHAIRMAN AND CHIEF EXECUTIVE OFFICER

Every one of us has a responsibility to ensure we uphold our high standards of behavior and integrity. Protecting our brand and reputation means we all have to make the right choices. I am counting on each one of you to promote and protect our brand by knowing, understanding and following this Anti-Corruption Policy, as well as the ManpowerGroup Code of Business Conduct and Ethics. Because of the commitment of all of our employees to working ethically, ManpowerGroup has been named one of the World's Most Ethical Companies for multiple years.

A handwritten signature in blue ink that reads "Jonas Prising".

Jonas Prising
ManpowerGroup CEO



I. Purpose

ManpowerGroup and its subsidiaries and affiliates worldwide are committed to conducting our business with honesty, integrity, trustworthiness, and accountability. This has been part of our heritage since our founding in 1948, and is the core of our Code of Business Conduct and Ethics (the “Code”).

We have a responsibility to comply with all applicable laws in the countries where we do business. This includes anti-corruption laws such as the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act, and similar laws in other countries and territories.

Our policy is straightforward: All employees, officers, the members of the Board of Directors (either of ManpowerGroup or any of its subsidiaries or affiliates), and others who act on behalf of ManpowerGroup (“ManpowerGroup Employees”) may not pay bribes or otherwise try to improperly influence anyone – in the government or in the private sector – even if such a payment is requested and called something other than a bribe. This is true whether an improper payment is made directly through a ManpowerGroup employee or through a third party, such as an agent or representative, vendor, client, partner, or other service provider.

II. This Policy Applies to Everyone at ManpowerGroup

This policy applies to all ManpowerGroup Employees, wherever located. All ManpowerGroup Employees are responsible for compliance with this policy in their conduct on behalf of the Company.

ManpowerGroup management is responsible for ensuring that employees under their supervision and authority comply with this policy. Management has vested certain employees with compliance responsibilities. Compliance personnel will assist ManpowerGroup Employees in understanding and complying with this policy and will take steps to maintain and implement an anti-corruption program, but the responsibility for compliance shall remain with ManpowerGroup Employees.

ManpowerGroup operations in specific countries may issue additional specific anti-corruption guidelines to conform to local laws or to address local circumstances. Any additional, country-specific guidelines must be consistent with this policy, except as approved by the General Counsel’s Office. No violation of federal, state, or foreign laws will be permitted or tolerated.

III. Oversight and Administration

The Audit Committee of the Board of Directors of ManpowerGroup is responsible for oversight of this policy and the Company's anti-corruption program.

As General Counsel, Richard Buchband oversees compliance with this Policy and the Company's anti-corruption program. Under his direction, Shannon Kobylarczyk, Global Ethics Compliance Officer handles the day to day inquires and routine approvals as outlined in this Policy.



If you have questions, please contact Shannon at **414.906.7024** or write to our team at ethics.training@manpowergroup.com or generalcounsel@manpowergroup.com.



IV. We Prohibit Bribery and Corruption in All Forms

ManpowerGroup strictly prohibits bribery and corruption of any kind in connection with the Company's business. Employees who are found to engage in bribery or corruption will face disciplinary action, up to and including termination, may face monetary penalties, and may be criminally prosecuted.

What Qualifies as Bribery and Corruption?

Bribery occurs when benefits (things of value) are provided directly or indirectly to individuals in order to retain a business advantage for ManpowerGroup. This includes benefits provided to government officials, business partners, clients or prospective clients, for their personal benefit in order to influence their actions or decisions in their official or business capacity.

Bribery is sometimes obvious and is sometimes very subtle. ManpowerGroup Employees are responsible for recognizing the red flags indicating possible bribery and corruption and responding to them in an appropriate manner as set forth in this policy. Beyond bribery, applicable laws prohibit other forms of corruption, such as trading in influence, and may require disclosures or other measures to ensure transparency.

Applicable laws prohibit bribery and corruption both of government officials and of private persons. Particular care should be taken by ManpowerGroup Employees in dealing with government officials, as the consequences of public sector bribery to the Company and the individuals concerned can be particularly harsh. Public tenders represent an area of particular sensitivity and should be treated accordingly if we are bidding in a public tender.

What Types of Benefits Can Constitute "Things of Value"?

"Things of Value" is a broad concept, and can include cash, cash equivalents (for example, gift cards), confidential information, meals, entertainment, travel, gifts, employment, contracts, in-kind services such as performing repair work on someone's home, or any similar types of goods or services that have tangible economic value.

Who Are Government Officials?

Government officials are broadly defined by anti-corruption laws.

They may include:

- ✓ Heads of state, ministers, and other political appointees;
- ✓ Civil servants;
- ✓ Other full or part-time employees of government;
- ✓ Private citizens acting in an official capacity;
- ✓ Security personnel (military, police, intelligence);
- ✓ Judges and legislators;
- ✓ Officers and employees of state-owned or controlled enterprises (for example, a state-owned petroleum company or airline); and
- ✓ Employees of other public institutions, including universities, laboratories, hospitals, and the like.

! The fact that a particular country does not treat an individual as a government official under the local law does not mean that the individual will not be treated as a government official under another applicable law. Compliance personnel are available to provide further guidance in cases of doubt.



V. Permissible Expenses

ManpowerGroup recognizes that providing gifts, entertainment, and hosting sponsorship or travel benefits is a legitimate part of doing business in many countries. However, it is your responsibility to follow the Policy on Gifts, Entertainment and Sponsorships as these activities may be considered to be corrupt benefits in some circumstances. ManpowerGroup's Policy on Gifts, Entertainment and Sponsorships explains when such expenses are permissible and when they are prohibited, and the controls that apply to such expenditures.



VI. We Do Not Allow Facilitating Payments

What Are Facilitating Payments?

“Facilitating payments” is a term that is used around the world in very different ways. In some countries, a facilitating payment is a euphemism for a bribe. In others, such as under the U.S. FCPA, it is a narrowly defined term that refers to certain small expediting, or “grease,” payments that, while not illegal, must be properly controlled and recorded on a company's books.

Facilitating payments are illegal under the laws of most countries around the world. In keeping with its policy of compliance with all applicable laws, **ManpowerGroup does not permit facilitating payments.** If you receive a request for a facilitating payment, you should decline to make it. It is not permissible to make such payments in the course of your work for the Company even if you bear the cost of such payments personally and do not seek reimbursement. All requests for facilitating payments should be reported to the Global Ethics Compliance Officer.

VII. Company Resources Cannot Be Used for Political Contributions and Activities

It is not permitted to use Company funds, property, or other resources to make any contribution or provide a thing of value to any political candidate, political party, or party official. Our Company will not reimburse anyone for any personal contribution made for political purposes. Everyone is welcome to participate in political activities on their own time and at their own expense, as long as it does not interfere with performance of duties with ManpowerGroup and is not in ManpowerGroup's name. In addition to being prohibited by Company policy, such payments can raise anti-corruption issues.

VIII. Charitable Contributions and Event Sponsorships Require Additional Consideration

ManpowerGroup is committed to serving the communities in which it does business. To that end, ManpowerGroup Employees may sponsor events or make contributions to charities for educational, social or other legitimate business purposes. Anti-corruption laws do not prohibit legitimate donations and sponsorships. But we have an obligation to ensure that funds that we commit for such purposes are used for the intended purpose, not diverted, and are given to proper recipients for proper purposes. Contributions and event sponsorships to known charitable organizations for legitimate business purposes, that are modest in amount, and that raise no special concerns may be made under this Policy without advance approval.

Examples of appropriate contributions include: a donation to the Girl Scouts to assist with a career-training fair for troops and donating to the Red Cross to assist with disaster relief.

Contributions and event sponsorships that raise special concerns require advance approval of the regional general counsel or financial director.

What do we mean by "special concerns?" Some examples are:

- ✓ The charitable organization or event is believed to be closely linked to a government official or a close family member or business associate of a government official.
- ✓ The donation or sponsorship is requested by a government official.
- ✓ The charitable organization or event organizer is not transparent regarding its usage of funds.
- ✓ The entity requesting the funds is not an established, known organization.
- ✓ The charitable organization or event organizer requests that the contribution be made in cash.
- ✓ Any other facts or circumstances that raise questions in your mind about whether the contribution will be used appropriately.

What is "modest" in amount? ManpowerGroup Employees are expected to use good judgment in this regard, but contributions below \$1,000 will generally be considered modest. In considering whether a contribution or sponsorship is modest in amount, the frequency of the contribution and related contributions will be taken into account. ManpowerGroup Employees should not subdivide a contribution into smaller amounts in order to have a contribution amount appear modest.



IX. We Must Keep Accurate Books and Records and Maintain Internal Controls

We are known for honesty and trustworthiness in all areas of our business. ManpowerGroup is required by law to keep complete and accurate books, records, and accounts. ManpowerGroup's accounting policies and internal audit procedures will generally ensure compliance with these requirements. Nonetheless, all expenditures must be fully and accurately described in all business documentation, not only as to the amount of the expenditure but also as to its nature or purpose. You should never create any record that is false or misleading, nor accept from any vendor or other third party a record that does not meet our requirements.

All business information including business and financial transactions must be reported in a timely and accurate manner. Additionally, you must follow established processes and obtain management authorizations as required. Financial information must reflect actual transactions and conform to generally accepted accounting principles. It is not permitted for anyone to establish undisclosed or unrecorded funds or assets.

X. Solicitation and Extortion Must Be Reported

In the event that a Government Official or another person (for example, a prospective client) solicits an improper payment from you, it is not an excuse to violate this policy. ManpowerGroup Employees should refuse such solicitation or request, and immediately report any solicitation or extortion to the General Counsel or the Global Ethics Compliance Officer.

Guidance note: Solicitations should be refused politely but clearly. You do not want your response to create the impression that you have agreed. Remind the requester that ManpowerGroup has strict policies and that you will lose your job if you engage in conduct that violates those policies.

XI. We Require the Same Behaviors from Our Business Partners

ManpowerGroup policy prohibits bribery and corruption whether it is direct or indirect. In some countries, it is commonplace to hire well-connected business agents or “finders” to help identify and solicit new business, to make introductions, or to lobby Government Officials. This can become a conduit for bribes. We expect that our agents, consultants, joint venture partners, or any other third party acting on our behalf (“Business Partners”) perform legitimate services, and adhere to the standards of ethical and professional conduct as described in this Policy and the [Code](#).

What are Red Flags Regarding Business Partners?

Warning signs (“red flags”) are any facts or circumstances – a pattern, practice, or specific event – that indicates the possibility of corruption. There are many examples of red flags, and the following list does not include all red flags that you may encounter.



- ✓ A new Business Partner is recommended by a Government Official.
- ✓ A Government Official or someone close to a Government Official has a business interest in a Business Partner.
- ✓ The Business Partner does not have experience performing the work it has been hired to do, or it is being hired solely because of its influence over a Government Official.
- ✓ The Business Partner makes suspicious statements (e.g., “don’t ask questions, I’ll take care of everything”), has a non-transparent structure, or insists on secrecy in its dealings with you.
- ✓ The Business Partner’s commission or profit margin is high compared to industry standards or the type of work it will provide.
- ✓ The Business Partner wants to be paid “under the table” or to an offshore account.
- ✓ The Business Partner refuses to sign a contract with anticorruption safeguards.
- ✓ The Business Partner submits false invoices, or refuses to provide documentation supporting invoices or claimed expenditures.

If you become aware of a red flag, please contact the [Global Ethics Compliance Officer](#) for guidance.

We Can Be Held Responsible for Conduct of our Business Partners

ManpowerGroup can be legally responsible for the conduct of a Business Partner when it occurs in the course of their work for the Company. In certain jurisdictions, ManpowerGroup may be held liable even if no one at ManpowerGroup was aware of illegal conduct.

No Business Partner should be asked to perform services for the Company without proper due diligence and without an agreement containing necessary anti-corruption safeguards. Commercial and financial due diligence is not enough. Due diligence should consider the reputation and integrity of a proposed Business Partner, as well as the extent of their internal controls to prevent improper conduct.

Ostriches are known for burying their heads in the sand when danger approaches. That’s fine for birds, but it is not acceptable behavior for ManpowerGroup Employees. Deliberately ignoring signs of corruption – acting like an ostrich, with your eyes closed – can have the same consequences as if you had positive knowledge of improper conduct.

Some examples of improper “head in the sand” behavior:

- ✓ “I don’t want to know how you get that government approval, just get it, and get it quickly”.
- ✓ “I’m not going to ask you any questions because I don’t want to know the answers.”
- ✓ I know this is a country with a lot of corruption, so I won’t ask our real estate broker how he manages with the local authorities”.

Red flags ([see page 10](#)), once identified, should be reported to the Global Ethics Compliance Officer who will assess the risk and determine whether appropriate safeguards can be implemented to reduce those risks to an acceptable level.

Our Responsibilities if We Work with Business Partners

Because of the potential liabilities associated with using Business Partners, a number of steps are required to protect ManpowerGroup:

- ✓ Business Unit for which the Business Partner will be engaged should conduct due diligence to reasonably ensure that the Business Partner is a legitimate entity, is qualified to perform services for which it will be retained, and maintains standards consistent with the legal, regulatory, ethical, and reputational standards of Manpower Group. The results should be documented and retained by the Business Unit. Contact the Global Legal Department if you are uncertain whether a Business Partner requires anti-corruption due diligence, or the degree of due diligence required.
- ✓ Business Partners should not be asked to provide services without a contract. Contracts help demonstrate the legitimate reasons why a Business Partner is being hired and the services s/he (or the entity being hired) is performing. Contracts also typically contain provisions to help protect ManpowerGroup. They are therefore important. Consult with your local Legal Department regarding what clauses are necessary.
- ✓ Employees should also ensure that any compensation paid to a Business Partner represents appropriate value for the legitimate goods or services provided. Payments to Business Partners should not be made in cash, to someone other than the contract counterparty, or to a place that has no connection with where the Business Partner is based or the contract activities take place, such as a tax haven or offshore location.

Our responsibilities do not stop once a Business Partner has a contract. We must constantly oversee the activities of our Business Partners. Any red flags or other concerns about the propriety of a Business Partner’s conduct that arise during the course of a relationship with a Business Partner should be reported to the Global Ethics Compliance Officer so that risks can be considered and appropriate safeguards developed

Some examples of concerns that could arise in a business partner conduct:

- ✓ The Business Partner asks for additional compensation when there is no legitimate need for it;
- ✓ You hear that a Government Official, or a close relative or business partner of a Government Official, has acquired an interest in the Business Partner; or
- ✓ You hear rumors that the Business Partner is under investigation for money laundering or some other criminal activity.

ManpowerGroup may conduct training of Business Partners, audits, or seek certifications of compliance in appropriate cases.

ManpowerGroup encourages its Employees to share this Anti-Corruption Policy with its Business Partners so they are aware of its commitment to lawful and ethical business practices. Additionally, our Supply Chain Business Partner Policy requires that our Business Partners provide positive assurances as to their commitment to certain key practices outlined in our [Supplier Code of Conduct](#).



XII. We Do Not Assist Clients with Improper Conduct

ManpowerGroup Employees working for a client should not allow themselves to be drawn into any improper payments or other improper conduct. Employees confronted with any situation that raises these types of concerns should discuss them as soon as possible with their supervisor or seek the guidance of Legal and Compliance personnel. Do not try to solve these types of problems on your own.

XIII. Merger and Acquisition Activity Requires Anti-Corruption Due Diligence

ManpowerGroup periodically engages in acquisitions of other businesses. By acquiring another company, ManpowerGroup can become liable for the prior conduct of that company. ManpowerGroup can also become responsible for continuing conduct that violates anti-bribery and anti-corruption laws. It is therefore the Company's policy that anti-corruption due diligence will be performed prior to completing an acquisition to enable it to identify and mitigate risks. Additionally, the Company will incorporate the acquired company into its internal controls and compliance program as soon as practicable, including through training new employees, reviewing third-party relationships, and conducting audits as appropriate. ManpowerGroup Employees are required to cooperate with any such efforts.



XIV. Annual Training and Certification

The Global Ethics Compliance Officer has established target criteria for mandatory annual training regarding anti-corruption principles. As a part of the annual training requirement, you are required to complete a certification in which you respond to certain questions and certify that you:

- ✓ have read and understand this Policy;
- ✓ will adhere to this Policy; and
- ✓ are not aware of any violation of this Policy.

XV. Reporting and Non-Retaliation

Any ManpowerGroup Employees who become aware, or suspect, that this Policy may have been violated shall immediately:

- ✓ Notify the General Counsel or the [Global Ethics Compliance Officer](#);
- ✓ Use the local ethics helpline number posted at their facility; or
- ✓ Use the global [ManpowerGroup Business Ethics Hotline](#). ManpowerGroup's outside service provider for the hotline maintains toll-free telephone lines which can be accessed as follows:
 - If calling from North America: **1.800.210.3458**. Click [here](#) for information about how to call from outside North America.

The identity of any person reporting a suspected violation will remain confidential, except to the required by applicable law. Anyone who makes a report through the ManpowerGroup Business Ethics Hotline also has the option to submit the report anonymously.

The Company will not tolerate retaliation against anyone who makes a report in good faith, as stated in the ManpowerGroup Anti-Retaliation Policy. Anyone who experiences what they believe to be any form of retaliation should report this concern as soon as possible to the General Counsel or the Global Ethics Compliance Officer.

XVI. Disciplinary Action

Employees who violate this Policy are subject to disciplinary action, up to and including dismissal and also may be subject to individual criminal and/or civil prosecution in relevant jurisdictions. Business Partners who violate this Policy are subject to termination of all commercial relationships with ManpowerGroup.

MANPOWERGROUP

Policy on Gifts, Entertainment and Sponsorships



ManpowerGroup®

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I. Introduction

This Policy is to assist you in determining whether to provide gifts, meals and entertainment, hosting, sponsorships, and travel benefits to third parties, particularly where government officials are involved. It also sets forth the processes that should be followed. It should be read and understood in conjunction with the [ManpowerGroup Anti-Corruption Policy](#). This policy applies to all employees, officers, members of the Board of Directors and others who act on behalf of ManpowerGroup.

Government officials may include:

- ✓ Heads of state, ministers, and other political appointees;
- ✓ Civil servants;
- ✓ Other full or part-time employees of government;
- ✓ Private citizens acting in an official capacity;
- ✓ Security personnel (military, police, intelligence);
- ✓ Judges and legislators;
- ✓ Officers and employees of state-owned or controlled enterprises (for example, a state-owned petroleum company or airline); and
- ✓ Employees of other public institutions, including universities, laboratories, hospitals, and the like.

ManpowerGroup's Anti-Corruption Policy strictly prohibits bribery and corruption of any kind in connection with the Company's business. Providing gifts, entertainment, and hosting, as well as sponsorship travel or other activities, can be a legitimate part of doing business. However, these activities can also be considered corrupt benefits in some circumstances and can lead to criminal liability for those involved. In addition, they may be regulated by the locale or country government where the benefits are provided, or restricted by the recipient's organization. This is particularly true where the benefits are received by individuals considered to be government officials under relevant laws. "Government officials" is a broad definition that can also include officials of government owned or controlled companies. In all cases, ManpowerGroup is required to maintain proper internal controls and adequate books and records relating to these benefits.

The rules and expense limits in this Policy govern your actions with third parties, such as clients, vendors, and government officials. Internal expenditures for gifts meals and entertainment – such as for your colleagues and teams – are not subject to this global policy. However, you are expected at all times to use good judgment, and comply with your local approval process, for such activities.

Any employee who becomes aware, or suspects, that this Policy has been violated should immediately:

- ✓ Notify their manager or supervisor,
- ✓ Notify the General Counsel or the Global Ethics Compliance Officer, or
- ✓ Report concerns through the [ManpowerGroup Business Ethics Hotline](#)



II. General Rules Applicable to All Types of Benefits

Gifts, meals, entertainment, hosting, and the provision of sponsorships or other benefits, including travel sponsorships, are referred to in this Policy as “Benefits.”

The following rules apply:

1. Benefits are **never** permissible when given to government officials, business partners, clients or prospective clients to influence their actions or decisions in their official or business capacity.]
2. Employees are expected to use good judgment in deciding whether to offer or provide Benefits and should be prepared to identify the legitimate business purpose of the Benefits. The specific sections that follow provide some examples of legitimate activities.
3. All requirements of local law and rules of the recipient’s organization should be complied with. Many companies limit the gifts or entertainment their employees can accept and client contracts may impose additional restrictions. Before you provide Benefits to a third party, it is your responsibility to obtain any required ManpowerGroup approvals, and also to confirm that local law, as well as the policies of your recipient, are being observed.
4. This Policy includes Global monetary limits. **Your country might have adopted lower expense limits to reflect local practices.** It is your responsibility to understand and comply with both Global and country-specific requirements.
5. Benefits should **always** be reasonable in amount and appropriate in nature.
6. Certain types of Benefits should never be provided. This includes cash Benefits, Benefits associated with illegal activity or activities that may harm the Company’s reputation, such as escort services, adult entertainment venues or gambling.

7. Appearances should be considered. Benefits most people would consider lavish or extravagant, or are of a personal character (for example, jewelry or luxury goods), tickets to premium events or trips to leisure destinations, should generally not be provided.
8. Benefits, such as gifts, given when there are pending business or contracting decisions with the recipient that could benefit ManpowerGroup may also create appearance issues, and should generally not be provided.
9. The frequency of Benefits to particular recipients should be monitored. Even relatively modest benefits, such as meals, when provided frequently, can create legal or appearance issues, and should be avoided.
10. The aggregate value of Benefits to particular recipients should also be considered. If the total value of gifts, meals and entertainment provided to a particular individual over the course of a year exceeds **\$250**, caution should be used before providing further Benefits to this individual.
11. The use of personal funds to provide Benefits is prohibited.
12. Benefit-related expenses must be accurate and complete and appropriately documented. Appropriate documentation includes receipts for expenditures, information about any attendees and beneficiaries (including name and place of employment), and explanation of the business purpose.
13. All expenditures for Benefits must be approved as set forth in [Section VII](#) below.
14. Operations that believe the circumstances of their business require different thresholds or approaches than what is set forth in this policy should discuss their needs with the Global Ethics Compliance Officer.



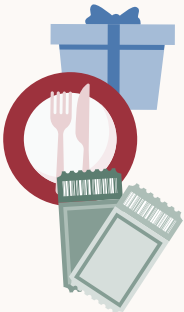


III. Gifts

All gifts should be appropriate to the occasion, reasonable in amount, and provided only as a courtesy or token of esteem. Gifts should not be given to influence the selection of the Company's services, or to influence or induce any action of a government official or business partner. **ManpowerGroup has a global gift limit of USD \$150.** You cannot exceed this global limit without prior written approval. To obtain approval, please refer to the [Approvals chart in Section VII](#). In addition to the global limits, Country-specific expense limits for gifts have been set by each country manager. Check your country-specific limit before providing any gift.

In addition to the guidance in Section II, the following guidelines apply to gifts given to Government officials, business partners, clients or prospective clients:

- ✓ Gifts should be given openly and transparently, consistent with the occasion. If you do not feel comfortable doing so, that is a sign of a potential issue.
- ✓ Local custom and practice in some locales may be different and should be taken into account.
- ✓ Cash and cash equivalents, such as gift certificates, traveler's checks, mobile phone top-up units, and checks, are never permissible gifts.
- ✓ Gifts to offices or groups that are intended to be shared with colleagues (for example, food baskets), are preferred over gifts to individuals.
- ✓ Particular care needs to be exercised with gifts to procurement officers or others who have the authority to award contracts to the Company. Gifts that are given when contracting decisions are pending may create the appearance of an improper intent to influence and should be avoided.
- ✓ Gifts of items for personal use or for family members or friends of government officials or business partners are less appropriate than Company promotional items, but may sometimes be appropriate (for example, flowers or a "hostess gift" when visiting someone's home for a meal)



As long as the gift is reasonable, examples of appropriate gifts include:

- ✓ Gifts to celebrate holidays that are commonly associated with gift-giving, including Christmas, Chinese New Year, and other similar events.
- ✓ Gifts to commemorate specific events, such as a business anniversary, closing of a business transaction, retirement, or the like.
- ✓ Gifts of promotional items engraved with the Company's logo, such as glassware, desk accessories, pens, coffee mugs, shirts, hats, etc., generally are appropriate gifts.

IV. Meals & Entertainment

As used in this section, meals and entertainment includes both traditional restaurant meals, as well as cultural and sporting events, both in-person or virtual, where we might purchase admission tickets and related food and beverages. Note, meals or entertainment that are part of sponsored travel are covered in [Section V](#) below, Travel. **ManpowerGroup has a global meals and entertainment limit of USD \$200.** You cannot exceed this global limit without prior approval. To obtain approval, please refer to the Approvals chart in [Section VII](#). In addition to the global limits, Country-specific expense limits for meals and entertainment have been set by each country manager. Check your country-specific limits before providing any meals and/or entertainment.



Examples of legitimate meals and entertainment include:

- ✓ Lunch incidental to a business meeting with a client.
- ✓ Dinner to commemorate the launch of a new business relationship.
- ✓ Inviting a business partner or client to join an employee at a soccer match. Note, the total event expenses, including tickets and any food and/or beverage provided should not exceed the global limit.
- ✓ You have a two-day planning meeting with a client or prospective client. On the second day, you organize a closing dinner cruise.

In addition to the general guidance in [Section II](#) above, the following guidelines apply to the provision of meals and entertainment to Government officials, business partners, clients or prospective clients:

- ✓ Business meals should be infrequent, consistent with country norms and local business practices, and never extravagant.
- ✓ ManpowerGroup Employees should select venues for meals and entertainment that will fall within this Policy. If you leave it to the person you are entertaining to select the venue, you may create a situation where you will be unable to meet this Policy. Plan in advance and avoid difficult and embarrassing situations!
- ✓ Family members or friends of a government official, business partner, client or prospective client may not attend a meal, sporting event or entertainment activity at Company expense, unless the spouses or friends of ManpowerGroup Employees are also attending, or advance approval has been obtained from the Global Ethics Compliance Officer.
- ✓ Entertainment can be part of a legitimate business gathering, provided the primary purpose of the gathering is business or business development. Stand-alone entertainment outings with no related business purpose, such as a golf weekend, are not generally appropriate business entertainment and require specific advance approval from the Global Ethics Compliance Officer.
- ✓ A Company employee or representative should attend any sporting events or entertainment activities with the government official, business partner, client or prospective client. For example, giving tickets to a sporting event so the individual can attend the event alone or with guests of their choosing is generally not appropriate.
- ✓ Where possible, payment for hosted meals and entertainment should be made by ManpowerGroup Employees directly to service providers.
- ✓ In those more unusual circumstances where reimbursement to a Government official or business partner for meals or entertainment is appropriate, the reimbursement must be supported by appropriate receipts reflecting the nature and amount of the expense being reimbursed.

V. Travel Sponsorships

Generally, government officials, business partners, clients or prospective clients are expected to pay the costs of their own travel. However, there may be certain circumstances where the Company pays the travel expenses for a government official, business partner, client or prospective client to visit a company business location, for a joint meeting, or for some other appropriate business purpose. Travel sponsorship costs may include transportation, accommodation, and meals, as well as other incidental costs. Travel sponsorship by the Company can involve significant expenditures of funds and require approval. To obtain approval, please refer to the Approvals chart in [Section VII](#).



Examples where the Company can pay the travel costs include:

- ✓ A board meeting of a joint venture where the Company's partner is a state enterprise.
- ✓ A contract with a client requires you to pay for travel of personnel for training purposes.
- ✓ A potential client wants to observe how services are provided at a particular locale.
- ✓ A visit to the Company's headquarters to understand ManpowerGroup's capabilities.

In addition to the general requirements in Section II above, the following guidelines apply to the provision of **travel sponsorships** to government officials, business partners, clients or prospective clients:

- ✓ All sponsored travel should involve a legitimate business purpose. Travel sponsorships that are purely for leisure or entertainment will not be approved.
- ✓ Payments in the form of a per diem for persons whose travel is being sponsored, e.g., cash payments or "walking around money," will generally not be approved.
- ✓ Where possible, payment of travel sponsorship expenses should be made directly to the service provider, e.g., airline, hotel, restaurant.
- ✓ If reimbursement for sponsored travel expenses is appropriate, the reimbursement must be supported by appropriate receipts reflecting the nature and amount of the expense
- ✓ Generally, the sponsored individuals' company, agency or organization, rather than Manpower Group, should select the specific individuals whose travel will be sponsored.
- ✓ Sponsored individuals should be prepared to demonstrate that they have received all internal approvals to enable them to travel.
- ✓ No family members or friends may accompany the government official, business partner, client or prospective client on the trip at the Company's expense, unless the family and/or friends qualify to receive such hosting in their own right.

VI. Event Sponsorships

Event sponsorships can take various forms, for example, where the Company sponsors an exhibition, activity, program, or the like. Event sponsorships typically allow the Company to promote its services or to gain visibility and goodwill. Events that are closely connected with government officials, business partners, clients or prospective clients (for example, the sponsorship is requested by a government official, or the organization to be sponsored is known to be linked to a government official or an immediate family member of the official), present special issues, as do sponsorships made in the context of a pending contract. To obtain approval in such situation, please refer to the Approvals chart in [Section VII](#).

In addition to the general requirements in Section II above, the following guidelines apply to event sponsorships benefitting Government officials or business partners:

- ✓ Event sponsorships should have as their primary purpose the promotion of the Company's services, good corporate citizenship, or other legitimate business justification.
- ✓ The Business Unit seeking to sponsor the event should conduct due diligence on event organizers and persons seeking the Company's sponsorship and the results documented and retained. Where possible, payment should be made directly to the event organizer. Sponsorships should not be paid in cash.
- ✓ Company employees should take steps to verify that sponsorship funds are used for the intended purpose, and that the Company receives the agreed benefits in return for the sponsorship.
- ✓ Any travel in connection with the event sponsorship must comply with the requirements of the Travel Section of this Policy, set forth in [Section V](#).
- ✓ Gifts provided in connection with the event sponsorship must comply with the requirements of the Gift Section of this Policy, set forth in [Section III](#).



VII. Authorizations and Approvals

The chart below outlines the approval requirements under this Global Policy. Don't forget to comply with any local limits or approval requirements.

Gifts, Entertainment, and Sponsorships Approvals

Type of Benefit Provided	Approval Is Required For:
Gifts	Gifts exceeding \$150 per recipient.
Meals and Entertainment	Meals and entertainment exceeding \$200 per recipient.
Stand-alone entertainment outings with no related business purpose	All outings.
Travel sponsorships	All travel sponsorships.
Sponsoring events that are closely connected to government officials, business partners, clients, or prospective business partners or clients	All events.

Approval Process

All requests for approval should be emailed to:

giftsandentertainment.authorization@manpowergroup.com.

Please include details regarding the proposed expenditure, including the name, title and affiliation of proposed attendees, budget, service providers. You must also state the business purpose.

The Global Ethics Compliance Officer will consider your request. All approvals will be made in writing. If an approved expenditure changes materially from the proposal provided (e.g., if the actual budget significantly exceeds the proposed budget, or if the attendees change), re-approval is required.

Record-Keeping

You must retain records of expenditures. Any submitted expense reports must reflect, in writing, the names, titles and affiliations of the attendees and the business purpose for incurring the expenditure.

VIII. Administration and Inquiries



The General Counsel, **Richard Buchband**, oversees compliance with this Policy and the Company's anti-corruption program. Under his direction, **Shannon Kobylarczyk**, Global Ethics Compliance Officer handle inquires and approvals.

If you have questions, please contact Shannon at **414.906.7024** or write to our team at ethics.training@manpowergroup.com or generalcounsel@manpowergroup.com.



ManpowerGroup™



ESG/SUSTAINABILITY

ENVIRONMENT

ENVIRONMENT

“Now is the time for climate action.”

#TheChangeStartsWithYouAndMe



OUR COMMITMENT

ManpowerGroup is committed to the fight against global warming. In 2021, our climate targets were validated by Science Based Targets (SBTi), the leading authority on climate action in the world of business.

Our ambition is to reach net zero emissions no later than 2045 and in this transition we have committed ourselves, by 2030, to:

- **reduce direct emissions from our operational activities by 60%** (Scope 1 & 2 - energy and electricity consumption in buildings, company cars etc.)
- **reduce value chain emissions by 30%** (Scope 3 - waste management, travel, mobility, suppliers).



ManpowerGroup™



Manpower®



Experis®
ManpowerGroup



Talent
Solutions
ManpowerGroup®

ManpowerGroup Belgium shares the same ambition.

To achieve our global strategy, we have set the following objectives:



ENERGY

- 100% renewable energy for our offices by 2030.
- Progressive transition of our branch network to low-carbon footprint buildings.
- Decrease our energy consumption



MOBILITY

- Zero CO₂ emissions from our company cars by 2030.
- Implementing actions to decarbonize our commuting (mobility plan, flexible working hours, hybrid working models, minimizing business travel).

ZERO PAPER / ZERO WASTE / RECYCLING



- 95% of our external documents in electronic form by 2025 and reduce internal document printing moving towards 'Zero Paper'.
- 100% Sorting & Recycling: procedures in place to ensure optimal reduction and sorting of internal waste, as well as recycling of materials (office furniture, IT equipment, electrical equipment, ink cartridges, etc.)

SUSTAINABLE PROCUREMENT



- Use of sustainable products in the daily running of the company (office supplies, bags, promotional materials, cups, etc.)

We raise awareness of environmental issues among all stakeholders.

All ManpowerGroup employees contribute to the achievement of our climate objectives by adopting eco-responsible behaviour on a daily basis.

'The Change Starts With You And Me'

Sébastien Delfosse

Managing Director ManpowerGroup BeLux



ManpowerGroup™



ESG/SUSTAINABILITY

SOCIAL DIALOG

SOCIAL DIALOG POLICY

“We are convinced that maintaining a healthy social climate is essential for ensuring a healthy economic climate.”

We are committed to building trusting relationships with our social partners and to respecting the role of trade unions within their legal remit.

The Human Resources department of ManpowerGroup BeLux, in close collaboration with the Head of Social Relations and the Head of the Legal department, manages and leads ManpowerGroup’s professional, trade union and institutional relations.

They work with the:

- management of the social calendar and meetings of staff representative bodies;
- negotiations with representative trade unions;
- the individual and collective management of staff representatives;
- social elections.

Sébastien Delfosse

Managing Director ManpowerGroup BeLux

ManpowerGroup BeLux
PR/18/2/ENG - 01/06/2023



ManpowerGroup™



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Talent
Solutions
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MANPOWERGROUP'S INFORMATION SECURITY POLICY

TODAY'S CONTEXT: RAPID DIGITAL TRANSFORMATION

The severity, frequency and impact of cyber-crime has been on the rise for a number of years. Now, with the acceleration of remote working and rapid digitization organizations will require even greater prioritization of information security capabilities. Business and security leaders are being challenged with advanced operational speed, unprecedented resilience and increasing regulatory oversight.



“As technology evolves and we adopt new tools and expand our use of data and analytics to deliver more value to clients and candidates, we are committed to being good stewards of the information entrusted to us. Managing our information security is vital to ensuring trust and transparency with our employees, clients, candidates, associates and partners. At the same time, the frequency and sophistication of cyber attacks are rising and we take our responsibility to be vigilant and to educate our people seriously.”

Randy L. Herold
Chief Information Security Officer and Chief Privacy Officer

OUR GUIDING PRINCIPLES

Keeping information safe requires constant risk assessment. Our Information Security and Privacy Program is a global framework that goes beyond just preventative tool sets, combining people, process and technology to reduce risk and create value for our clients. Our top priority is to protect the data people entrust to us.

Our commitment to the highest standards of information security and data privacy are outlined in our global Code of Business Conduct and Ethics. Available in 20 languages our Code is shared with every employee and may be available to our stakeholders around the world.

PEOPLE

- Recognizing the best line of defense is not a tool or platform - it's our people.
- Understanding and influencing user behavior by knowing where information resides, how it moves across our systems, and who has access to it throughout the full information lifecycle, so that we can protect the data of our employees, clients, candidates, associates and third-parties.
- Leveraging collective threat intelligence through relationships with industry partners like the FS ISAC which allows us to share practices and maximize our security capabilities.

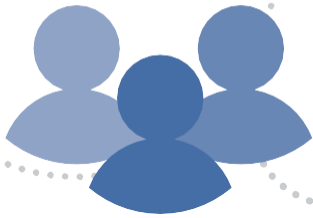
PROCESSES

- Positioning information security as a governing body – Information Security provides the oversight necessary to align our technology services with business, legal and regulatory requirements.
- Focusing on situational awareness and response time by targeting our monitoring capabilities specifically on ways we can improve our awareness.

TECHNOLOGY

- Recognizing that preventative technology is not enough to keep a determined attacker at bay, we've expanded our detection and response capabilities throughout the organization.
- Preventing credential theft by prioritizing privileged access management capabilities.

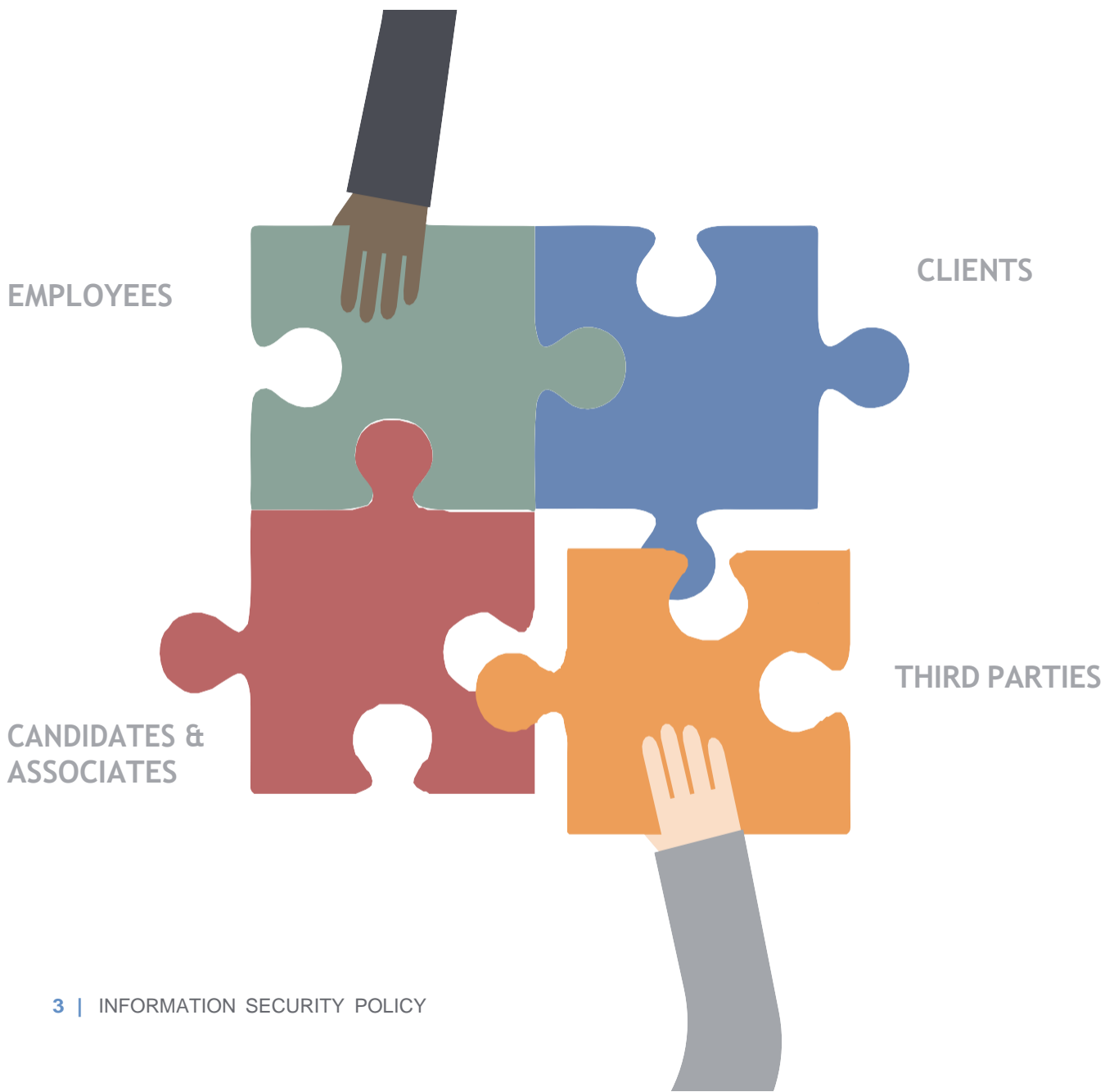




PEOPLE

PROTECTING WHAT MATTERS: OUR EMPLOYEES, CLIENTS AND ASSOCIATES

At ManpowerGroup, our impact extends far beyond our own internal operations. Our clients and associates entrust us with their business-sensitive data, and we take that responsibility seriously. Our Global Privacy Policy describes the types of personal information we collect from employees, clients, candidates, associates and third parties, how we use it, with whom we share it, and the rights and choices available to individuals regarding our use of their information. All privacy policies, maintained at the country level, align with our global standards and comply with local laws and regulations.



LEADING FROM THE TOP

Our Information Security philosophy is led from the top with our Board's oversight capacity to ensure key security threats are managed through an effective governance and management structure. The Chief Information Security Officer (CISO) meets quarterly with the Audit Committee of the Board of Directors to review and discuss security strategy and progress around our investments. Under the direction of the CISO, responsibility for our global security program resides at the highest levels of executive leadership reporting to the Chief Financial Officer.

A MULTI-LAYERED APPROACH TO GOVERNANCE

While our CISO maintains a regular reporting cadence with the ManpowerGroup Board of Directors, including an annual report outlining our compliance and adherence to this Information Security Policy, the Security function operates independently from Information Technology (IT). Regular updates are provided to both the Board and Executive Leadership Team, as well as various steering and working committees. The Information Security Program is assessed annually by an independent third party to ensure alignment with the current threat landscape.

Our organizational structure utilizes a functional approach where strategy, business alignment and oversight are direct responsibilities of the CISO. Functions, such as architecture, operations and vendor management, resident within the CISO's team of direct reports, which includes third-party contractors and managed service providers.

Our talented team dedicated to information security and data privacy has increased in size significantly over recent years. Our people are strategically positioned at the global, regional and local market levels to provide consistent policies, processes and technology solutions. Our highly trained staff maintains industry certifications that include: CISSP, CISM, CISA, CRISC, CSCP, CCISO, CCSP, CASP, CPDSE, ISO 27001 Lead Auditor, ISO/IEC 27005 Risk, Manager, CIPM, CIPP/E, FIP.

BUILDING THE CAPABILITIES AND SKILLS OF OUR PEOPLE

We recognize that preventative technology is not enough to keep a determined adversary at bay and acknowledge that our best line of defense against security threats is not a technology tool or platform – it's our people.

That's why we continuously develop updated employee education and awareness programs including online training, regular anti-phishing exercises and company-wide Cyber Month Campaign, offering daily bite-size training, instructor-led seminars, team activities and security related quizzes and competitions. All members of the Executive Leadership Team are included in all cyber training and phishing awareness campaigns alongside the whole organization. Through this awareness training, employees are educated on how to report suspicious activities they identify in their workplace environment or in the technology they use. As an example, seamless security integration enables employees to report suspected phishing emails with one click. Additionally, third party service providers and partners with access to sensitive data or systems are required to participate in security awareness training equivalent to that provided to ManpowerGroup employees.

Through these enhanced and targeted awareness efforts, employee engagement and digital learning campaigns, and regular communications from the CISO and Information Security teams, we are nurturing a risk-aware culture across our organization and our resilience to social engineering continues to demonstrate measured improvement year on year.

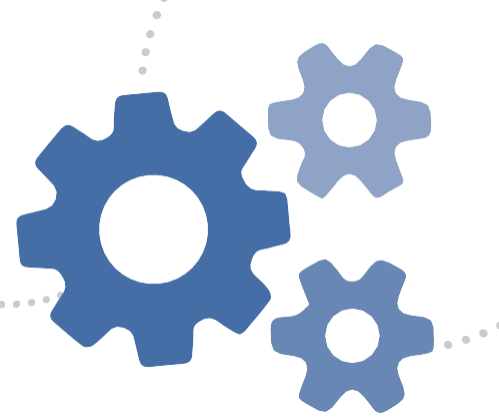


Embedding Security into our People & Culture Practices

ManpowerGroup ensures that industry-acknowledged security practices are incorporated into our People and Culture (P&C) employee management practices, including:

- Defining, documenting, and communicating the information security roles and responsibilities of employees, contractors and third-party users through the security awareness program
- Signing confidentiality agreements as part of an employment contract
- Requiring third parties to maintain compliance with information security requirements
- Ensuring that employees have access to current security policies, standards and procedures
- Providing employees – including Executive Leadership and CISO - with regular information security awareness training
- Ensuring that ManpowerGroup information assets are returned upon engagement termination
- Removing access rights to information upon engagement termination

PROCESSES



MAINTAINING PROTOCOL

We have established a comprehensive global information security framework, aligned with the NIST CSF (National Institute of Standards and Technology Cyber Security Framework) and internationally recognized ISO 27001 standard, which all of our operations around the world are required to adopt. All policies, procedures, controls and standards have been documented, communicated and operationalized; each has a dedicated owner and are reviewed at least annually for appropriateness and adequacy. ManpowerGroup uses multiple technologies as well as manual verification processes to enforce compliance with internal policies as well as regulatory and contractual requirements.

Policies: to align with industry standards.

Controls: to confirm policies are enforced.

Standards: to ensure contractual, legal and regulatory compliance.

Procedures: to utilize the standards.

SECURE, BY DESIGN

Recognizing preventive technology is not enough, all of our processes are designed with a defense-in-depth philosophy; if one layer of the process fails, a subsequent process is designed to mitigate the risk. Security controls are implemented across multiple layers and are integrated into a centralized monitoring solution, which ensures that we are able to monitor and respond efficiently 24x7. Through all our processes, we work to prevent credential theft by leveraging the principles of “least privilege” and “need to know” to minimize access risk and limit lateral movement within our environment.

OVERSEEING OUTSOURCED INFORMATION SECURITY SERVICES

Some daily operational security activities are outsourced to provide us with access to new skillsets and maximize our financial investment. All third-party resources leveraged for information security expertise are vetted prior to contract engagement and must meet or exceed ManpowerGroup's own policy standards. To ensure continued quality and information security assurance, these suppliers are held to contractually binding service level agreements, regular business reviews, and audits of their practices.

We have established controls to protect the integrity, confidentiality, and availability of information assets that are accessible to outsourcers, partners, clients, and external suppliers, including:

- ✓ Requiring that agreements or contracts with third parties that create, access, store, transmit and / or process ManpowerGroup information include the Vendor Information Security Requirements (VISR) defined for the type of services provided
- ✓ Requiring CISO or delegate approval to changes to information security requirements
- ✓ Requiring remediation or implementation of mitigation controls for identified third-party business processing risks
- ✓ Ensuring signed confidentiality and non-disclosure agreements or equivalent documentation are in place
- ✓ Only granting third-party access to ManpowerGroup information assets upon business need and requiring written approval by an authorized ManpowerGroup executive or their delegate

SOFTWARE DEVELOPMENT LIFECYCLE (SDLC)

Application development efforts follow the defined secure SDLC process where security requirements are defined, documented, and tested. Application development ensures secure coding practices are utilized and evidenced via pre-promotion security assessments. Additionally, educational materials for developers on secure coding are published and a strict separation of duties has been implemented between production and non-production environments.

Assessing for Risks

INSIDE OUT:

We continuously assess ourselves and adjust our defenses in real-time.

1 Collecting Data & Identifying Information Assets

The first step in our risk assessment process is to gather information from our business and technical subject matter experts. Both technical and non-technical evidential documentation is gathered as well as key performance indicator (KPI) reports.

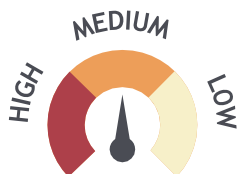
2 Analyzing Risks

ManpowerGroup's data classification standard allows us to quickly classify, and rank information assets based on their function, the criticality of the data they support, and the sensitivity of the data created, accessed, stored, transmitted or processed.

Controls are evaluated regularly to determine their protective and / or detective effectiveness. They are not assumed to be completely effective, therefore consistent reporting helps assess their impact. These reviews include physical and technical controls and apply to both ManpowerGroup operations as well as third party functions. Key performance indicators are used to identify which controls require attention and action is taken accordingly. And then the cycle repeats.

As part of the risk assessment process, we continually assess for potential threats and vulnerabilities.

- Vulnerabilities: solution weaknesses or control gaps that if exploited, could result in the authorized disclosure, misuse, alteration or destruction of information assets.
- Threats: potential agents for exploiting a vulnerability



3 Assigning Risk Ratings

The last step is assigning a rating (High, Medium or Low) for each information asset. The rating is a culmination of the information asset inventory, asset classification, threat and vulnerability assessment, and the control effectiveness evaluation.



4 Rinse, Repeat

The risk assessment process is a constant cycle of self-evaluation and remediation.

OUTSIDE IN: Staying Aligned with a Changing Threat Landscape

Each year an independent external assessor conducts a risk / threat assessment to evaluate the effectiveness of our program in the context of a fast-changing security landscape. This assessment, along with metrics and key performance indicators (KPIs), is reported to senior leadership and the Board. Additional independent assessments are also conducted throughout the year by third parties and clients as well as both internal and external audit. The results are shared with the Information Security team and remediation activities are developed and integrated into the on-going projects / daily activities of the Information Security team and their supporting partners.

Access Control

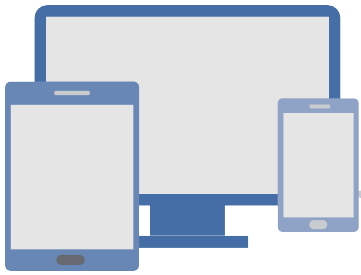
To safeguard our information assets, access is limited to authorized, business-justified entities with a “need to know.” We have taken thorough measures to prevent the inappropriate use of access credentials:

- Requiring strong authentication for and monitoring all access to sensitive information
- Issuing unique authentication credentials in accordance with “least privilege” and separate from standard user-level user IDs
- Disabling all system access after a period of inactivity
- Monitoring all network infrastructure, hardware and software while privileged access is in use
- Changing default access and configurations provided by hardware and software vendors
- Encrypting information shared in digital communications required by law, regulation or contractual agreement
- Requiring multi-factor authentication (MFA) for all remote access

Physical and Environmental Protection

Processes and procedures protect against unauthorized physical access, damage, and interference with business operations:

- Protecting secure areas with defined security barriers and entry controls
- Physically protecting all information assets such as paper files, end user devices, servers, network devices, databases, storage devices and backups from unauthorized access, damage, and interference
- Instructing employees to lock unattended systems and secure their workspace environment
- Securing facilities against unauthorized access per applicable local laws, regulations, and contractual requirements
- Ensuring that information retention and destruction follows ManpowerGroup’s Record Retention Policy



TECHNOLOGY

Monitoring Activity, Analyzing and Responding to Security Events

ACTIVITY MONITORING

ManpowerGroup has established an organization-wide Security Information and Event Monitoring (SIEM) solution that collects event information from ManpowerGroup devices (e.g. IDS/IPS, HIDs, system event logs and firewalls) and sends it to the Security Operations Center (SOC) for detailed analysis. The SOC correlates and analyzes the data to identify potential malicious behaviors / activity. The SOC also uses input from third-party threat analytics to assist in the identification of indicators of compromise (IOC) that may exist within the ManpowerGroup environment.

ANALYZING AND RESPONDING

ManpowerGroup uses an incident tracking system to document and track security events including:



Event Entry

Events reported to the Security team or identified by the SOC, where a designated member of the Security team assumes ownership of the event and the responsibility for updating the tracking system and escalations where necessary.



Tracking

Tracking occurs on all opened events to document investigation details, drive accountability and ensure timely closure. Escalation measures ensure appropriate parties are informed and necessary requirements are met, especially in a situation where timely escalation is required as part of regulatory compliance and / or the fulfillment of an established contractual agreement. Additionally, the root cause and responsible party are determined to assist in remediating the incident.



Remediation

Remediation may require participation from various teams and external parties. The Information Security team provides guidance or direction on appropriate corrective measures.



Incident Closure

An incident is classified as closed after evidence has been gathered to confirm that the required remedial actions and / or preventive measures have been performed or risk has been mitigated to an appropriate level which requires senior leadership sign-off.



Post-Closure Lessons Learned

After formal closure, a holistic review of the incident occurs, including root cause analysis, communications review and opportunities for improvement in the overall response / remediation process.

Encryption

Our encryption controls ensure that sensitive information remains confidential and protected while at rest or in motion. Protections include:

- Implementing an encryption standard that defines the requirements for encrypting sensitive information and ensures compliance with statutory, regulatory and contractual requirements
- Encrypting sensitive information when it is stored or transmitted across public networks
- Encrypting remote access connections into our ecosystem
- Requiring CISO approval for non-standard encryption methods

Malware

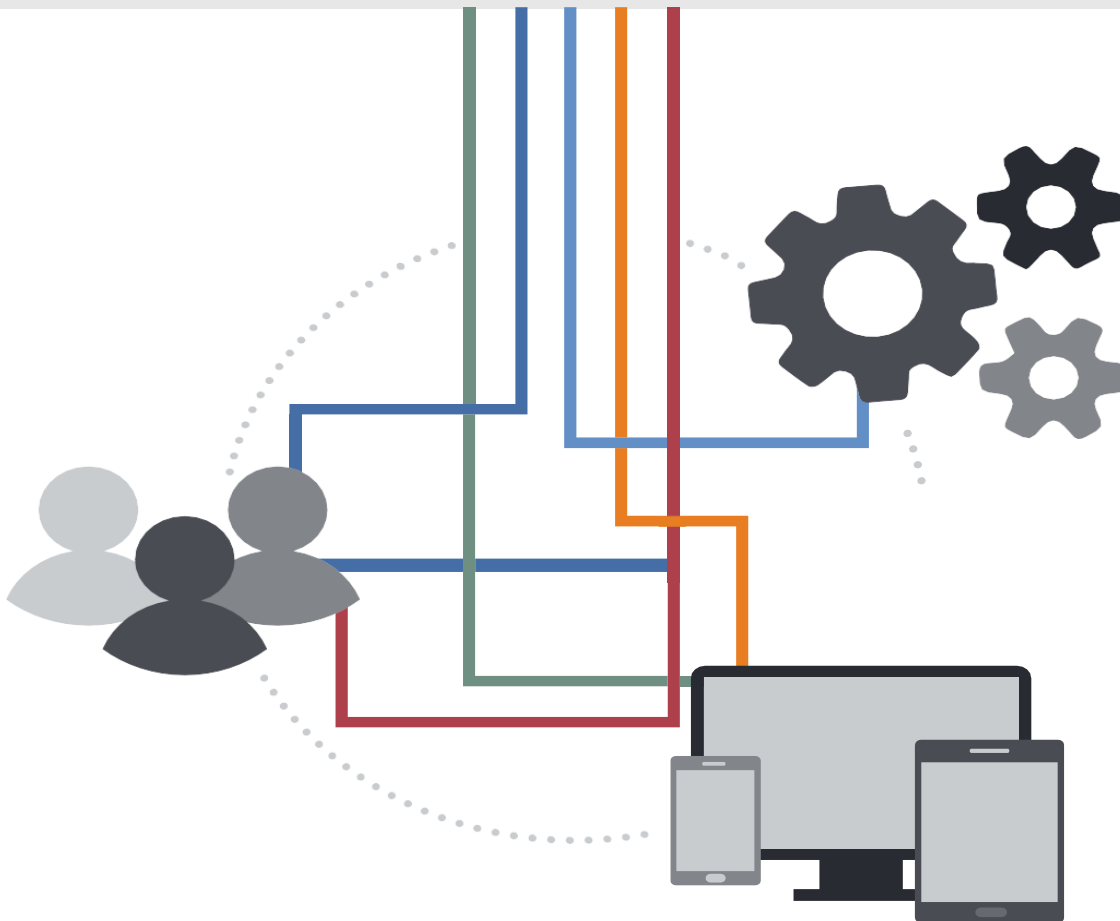
We protect from malicious code execution (Malware) through activities including:

- Confirming our security controls through regular audits
- Monitoring and recording systems and events
- Protecting information system logging facilities and log information against tampering and unauthorized access
- Subjecting all hardware and software to adhere to the vulnerability management program that includes anti-virus protection, security patches and industry-acknowledged practices for asset hardening and defense
- Requiring workstations and servers to install, configure and maintain end-point protection software
- Scanning public-facing web applications for vulnerabilities at least annually
- Implementing regular end-user education campaigns and communications
- Utilizing web and email technology to scan for malware prior to it entering our environment

Business Continuity

Our Business Continuity Program ensures resiliency for ManpowerGroup's business operations through a comprehensive Response and Recovery Framework that features:

- A formal Business Impact Analysis process that identifies critical processes and supporting IT enablers
- Risk assessments that identify and prioritize risks related to confidentiality, integrity, and availability
- A Business Continuity Plan (BCP) that is reviewed, updated and distributed regularly
- Comprehensive backup and recovery strategies that ensure operational Recovery Time Objectives (RTO) and Recovery Point Objectives (RPO)
- Training, awareness, and testing



Contact Us

We appreciate your interest in our Information Security Policy and encourage you to become more involved with the protection of your data. If you have any questions about how ManpowerGroup protects its information as well as the information entrusted to us please contact me directly. If you would like to hear more about our program, please do not hesitate to request a meeting with us. On behalf of ManpowerGroup and the entire Security team, we look forward to working with you.



Randy L. Herold

Chief Information Security Officer

randy.herold@manpowergroup.com

Learn more about our Information Security Policy and Practices:
<https://www.manpowergroup.com/sustainability/infosecprivacy>

ManpowerGroup BeLux
PR/22/0/ENG – 01/08/2022



ManpowerGroup®



MANPOWERGROUP

Supply Chain Business Partner Policy

Policy

It is ManpowerGroup policy to require that our supply chain business partners be committed to business principles, culture and values that align with our own commitments to social responsibility and sustainability, and that these business partners provide positive assurance as to their commitment to certain key practices as outlined in our Supplier Code of Conduct.

ManpowerGroup enjoys a reputation for conducting business with integrity and respect for all of those who are affected by our activities. This reputation is an asset for both ManpowerGroup and our business partners. We apply the standards of socially responsible and sustainable conduct globally and in each aspect of our day-to-day business. These principles include a commitment to establish mutually beneficial relationships with our suppliers. Further, our expectation is that our supplier business partners will adhere to business principles, culture and values that are consistent with our own standards of social responsibility and sustainability including the principles of the [United Nations Global Compact](#) to which we are committed.

This Policy is intended to support the Company as it strives to meet the increasing need for transparency with regard to how businesses manage their broad range of operational, social and environmental responsibilities.

What is Required

Supply chain business partners are required to provide the following as positive assurance of their commitment:

- a. Confirm the intention to comply with the Supplier Code of Conduct either in the supplier's contract or through signing and returning the Supplier Affirmation Form (Attachment #2).
- b. Expressly notify ManpowerGroup should any of the key principles cause specific concerns.
- c. Provide ManpowerGroup with specific, internal company policies, procedures, published reports and/or other information that show further positive assurance as to adherence to the key practices, upon request.

Non-Compliance

ManpowerGroup's intention is to establish a compatibility of standards and to incorporate the above practices in the supplier approval processes of ManpowerGroup's businesses. The expectation is that, where there are differences, ManpowerGroup and the supplier will agree on an acceptable level of consistency and that the supplier will actively work toward achieving the desired level of performance. As a last resort, ManpowerGroup is prepared to terminate business with any supplier that does not demonstrate progress towards meeting ManpowerGroup's Supplier Code.

ManpowerGroup's business partners are encouraged to report any concerns directly to their primary contact or via the [ManpowerGroup Business Ethics Hotline](#).

Entity Compliance Process

- ✓ Entities must confirm their adherence to this Policy on the quarterly Internal Control Checklist.
- ✓ Audit Advisory Services will also confirm compliance with this Policy as in-country or desk audit procedures are performed.

Supplier Code of Conduct

Obeying the Law

1. Compliance with all applicable laws and regulations of the jurisdiction where operations are undertaken.

Business Integrity

2. No offer or attempt at improper advantage, including the payment or acceptance of bribes, to secure delivery of goods or services.

Employees

3. Provision of safe and healthy working conditions for all employees.
4. Zero tolerance of human trafficking.
5. No use of any form of forced or compulsory labor and freedom of employees to leave employment after reasonable notice.
6. No use of child labor and compliance with relevant International Labor Organization standards.
7. No discrimination due to race, color, religion, national origin, cultural background, gender, age, disability, sexual orientation, or gender identity, or any other protected status in the jurisdiction where operations are undertaken.
8. Wages and working hours complying, at a minimum with applicable laws, rules and regulations regarding employment, including minimum wage, overtime and maximum hours in the jurisdiction concerned.
9. Respect for the right of employees to freedom of association and collective bargaining.
10. Ensure the privacy and protection of personal and sensitive information and data.
11. Provide training and learning opportunities.

Clients and Customers

12. Delivery of services which consistently meet specified quality, safety and data privacy and other relevant criteria.

Communities

13. Giving back to the community.

Environment

14. Management of the business in an environmentally sound manner, including compliance with all relevant legislation of the jurisdiction where operations are undertaken.

**ATTACHMENT 1 – MANPOWERGROUP’S REQUEST FOR BUSINESS PARTNERS TO
ACKNOWLEDGE COMPLIANCE WITH OUR SUPPLIER CODE OF CONDUCT**



ManpowerGroup® OR < Local Country Letterhead Paper >

< date >

Dear Sir or Madame:

RE: Corporate Social Responsibility and ManpowerGroup’s Supply Chain Business Partners

ManpowerGroup enjoys a reputation for conducting business with integrity and respect for those our activities will affect. This reputation is an asset for both ManpowerGroup and our business partners. Attached, for your information, is the website link to ManpowerGroup’s [Code of Business Conduct and Ethics](#). ManpowerGroup applies these standards of conduct globally and in each aspect of our day-to-day business. These principles include a commitment to establish mutually beneficial relationships with our suppliers. Further, our expectation is that our supplier business partners will adhere to business principles, culture and values that are consistent with an attitude of social responsibility.

There is an increasing need for transparency with regard to how businesses manage their broad range of operational, social and environmental responsibilities. We require our supply chain business partners to provide positive assurance that they intend to operate in accordance with the key business practices outlined in ManpowerGroup’s Supplier Code of Conduct.

As a first step, we ask you to provide a response on the attached form:

- a. Acknowledge receipt of this letter and confirm your intention, in principle, of complying with the key practices outlined in ManpowerGroup’s Supplier Code of Conduct.
- b. Provide feedback to ManpowerGroup should any of the key practices cause specific concerns. Our expectation is that, where there are differences, we will agree on an acceptable level of consistency and that you will actively work toward achieving the desired level of performance.
- c. Provide ManpowerGroup with specific, internal company policies, procedures, published reports and/or other information that show further positive assurance.

We hope you share the sense of importance we attach to the key business practices in the Supplier Code. We believe these policies are central to the sustainability of our business and imperative to the industry in which we jointly participate.

If you have any questions, please contact the ManpowerGroup representative noted below.

Thank you.

Yours sincerely,

On behalf of ManpowerGroup (your local company name)
XXX (Local Country Lead Name here)

ATTACHMENT 2 – SUPPLIER AFFIRMATION FORM

RE: Affirmation of Adherence to ManpowerGroup’s Supplier Code of Conduct

On behalf of my Company, its subsidiaries and sister companies, I acknowledge receipt of ManpowerGroup’s Supplier Code of Conduct. We affirm that we operate in accordance with the key practices concerning; Obeying the Law, Employees, Clients & Candidates, Communities, the Environment and Business Integrity. We will notify ManpowerGroup immediately should any of the practices in the Supplier Code cause concern, and agree to work toward achieving a mutually agreed upon level of performance. We understand that non-compliance or lack of progress toward compliance may be cause for ManpowerGroup to terminate the business relationship.

Organization Name:	
Geographic Locations Covered: (global, regions, or countries)	
Comments (if applicable):	
Name of Person Signing:	
Title:	
Date:	
Signature:	

Please return the original signed and dated form to ManpowerGroup’s address below, along with any specifically requested information about your internal company policies and/or published reports that provide further positive assurance for your company’s practices. Additionally, all responses justifying a company decision not to follow or incorporate the key practices defined in the Supplier Code should also be sent to the contact below.

XXX (Local Country Lead/Contact Name here)

XXX (Local Country Lead/Contact Title here)

ManpowerGroup

XXX (Local Country Corporate Headquarters address here)

XXX (Local Country Contact Details)

ESG & SUSTAINABILITY POLICIES

There is more information on ManpowerGroup's sustainability strategy here:

- > Worldwide: [manpowergroup.com](https://www.manpowergroup.com)
- > For Belgium: [manpowergroup.be](https://www.manpowergroup.be)