

ESG & SUSTAINABILITY POLICIES



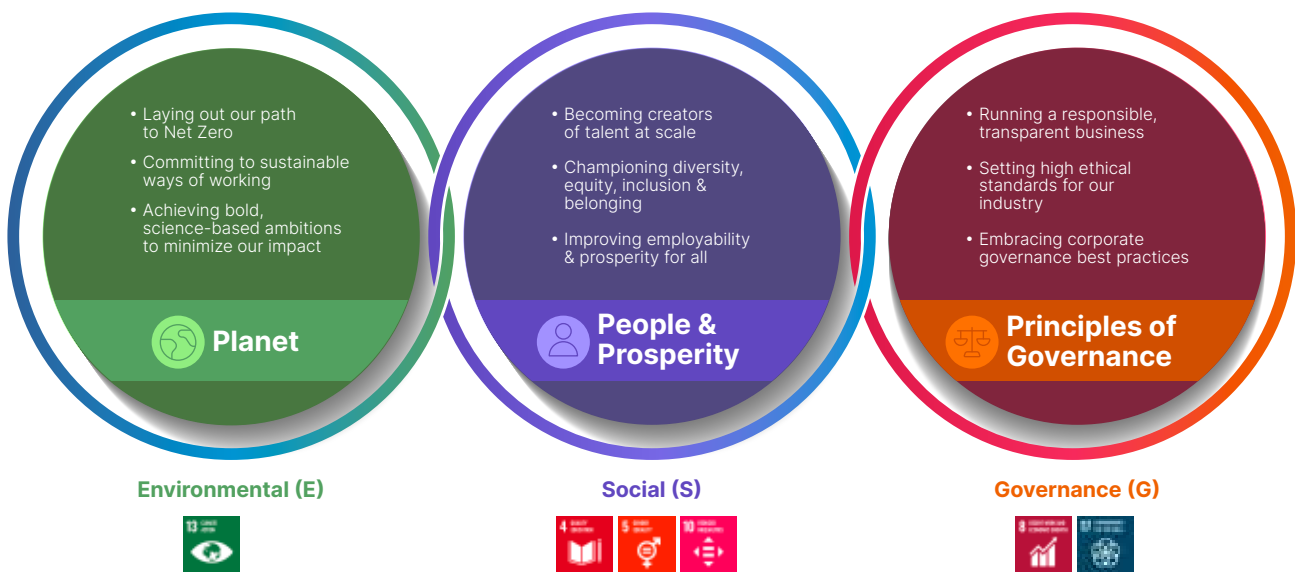
ESG & SUSTAINABILITY POLICIES

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



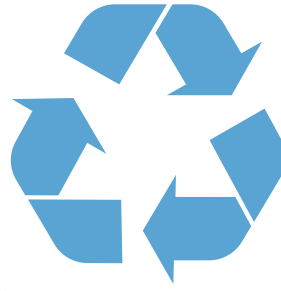
There are various **policies** behind our sustainability plan:

- 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

TABLE OF CONTENTS

- > 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

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.**

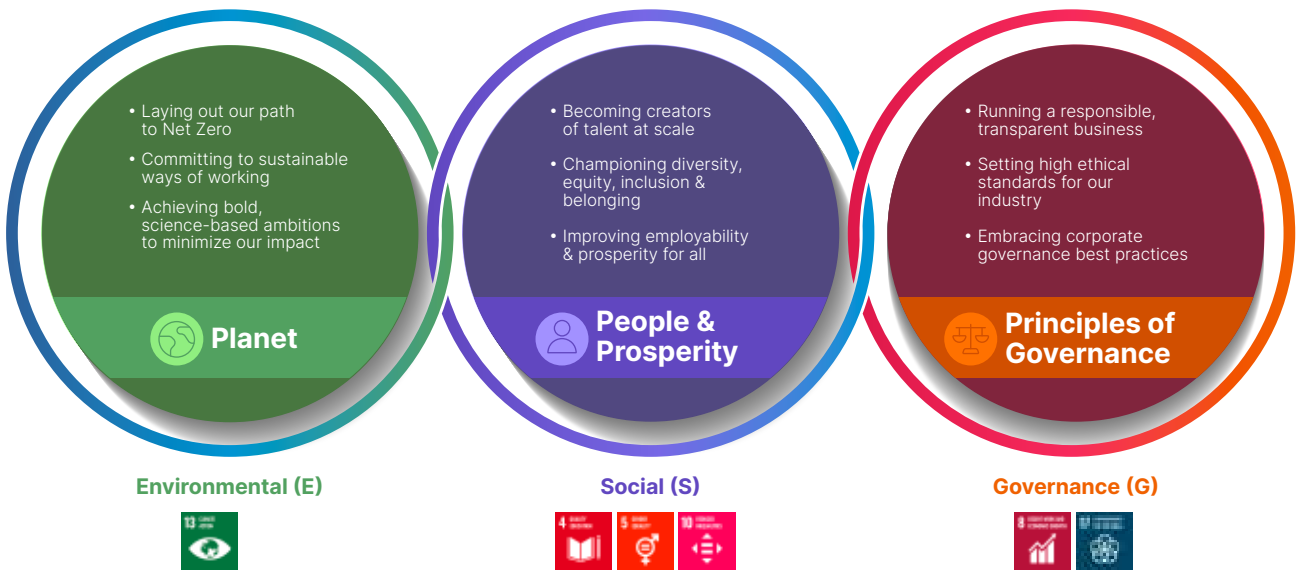
Our **sustainability plan ("Working to Change the World")** addresses the challenges of the world of work through three priorities (ESG), focusing on the areas where we have the most impact:

> **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.

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.

ManpowerGroup BeLux

The background of the document is a photograph of a modern office. In the foreground, a group of four people (three women and one man) are seated around a dark, rectangular table, engaged in a meeting. They are looking at documents and laptops. The office has large windows that look out onto a city skyline. The image is overlaid with a semi-transparent white banner containing the title and a large, stylized 'M' logo in the bottom right corner.

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](#)



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:

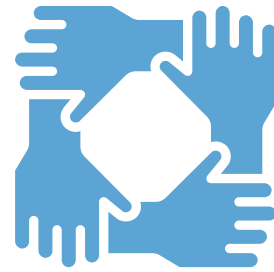
- Preserving the physical and psychological integrity of our employees;
- Reducing the number of accidents at work and work-related illnesses;
- Improving working conditions to promote professional well-being.

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.

ManpowerGroup BeLux



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**:

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.

ManpowerGroup BeLux

ManpowerGroup BeLux
PR/11/3/ENG - 01/10/2025





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

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.

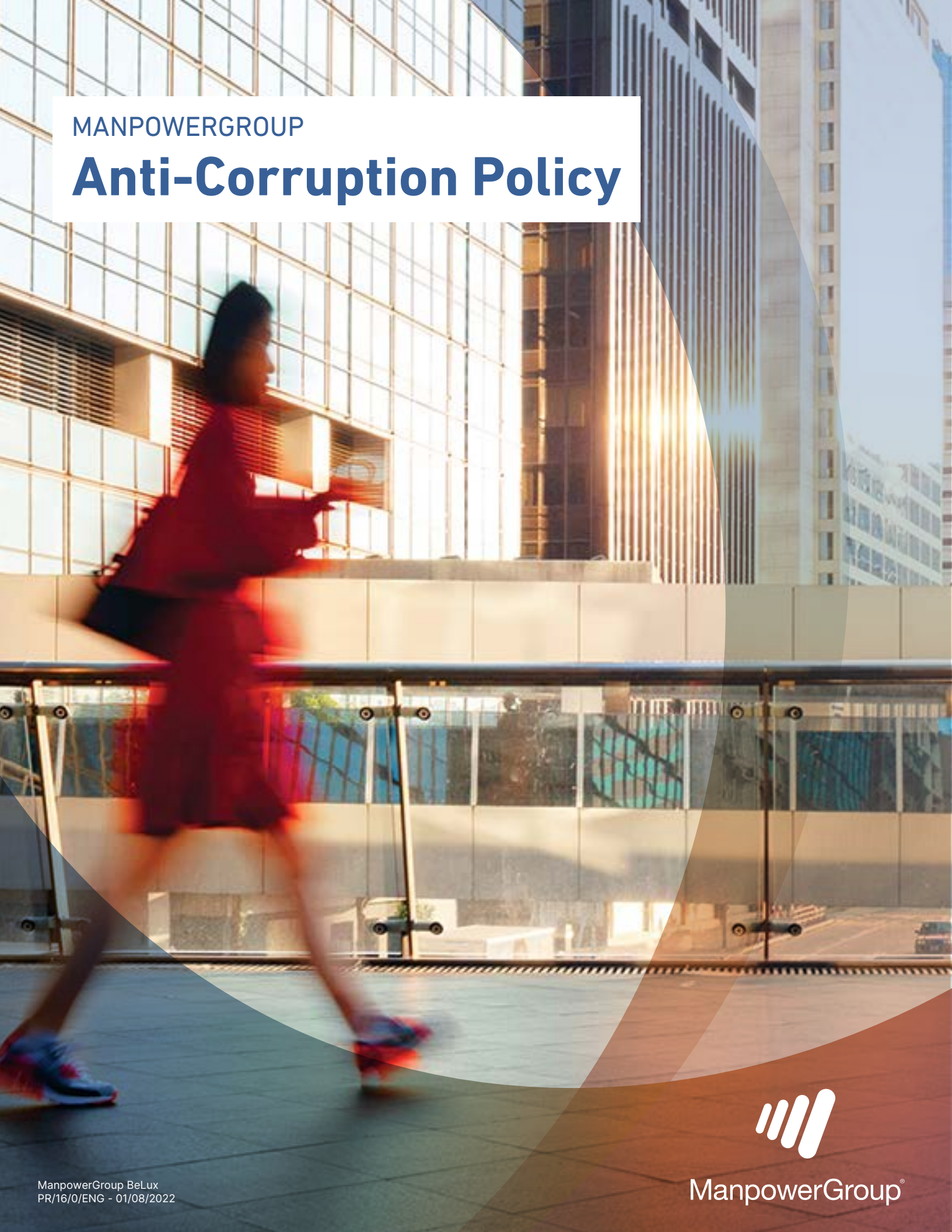
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ManpowerGroup BeLux

ManpowerGroup BeLux
PR/14/3/ENG - 01/10/2025

MANPOWERGROUP

Anti-Corruption Policy



ManpowerGroup®

TABLE OF Contents

Our Chairman and Chief Executive Officer	3
I. Purpose	4
II. This Policy Applies to Everyone at ManpowerGroup	4
III. Oversight and Administration	5
IV. We Prohibit Bribery and Corruption in All Forms	6
V. Permissible Expenses	7
VI. We Do Not Allow Facilitating Payments	7
VII. Company Resources Cannot Be Used for Political Contributions and Activities	8
VIII. Charitable Contributions and Event Sponsorships Require Special Consideration	8
IX. We Must Keep Accurate Books and Records	9
X. Solicitation and Extortion Must Be Reported	9
XI. We Require the Same Behaviors from Our Business Partners	10
XII. We Do Not Assist Clients with Improper Conduct	12
XIII. Merger and Acquisition Activity Requires Anti-Corruption Due Diligence	12
XIV. Annual Training and Certification	13
XV. Reporting and Non-Retaliation	13
XVI. Disciplinary Action	13



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.

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 inquiries 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.

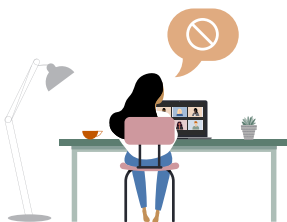
Our responsibilities do not stop once a Business Partner has a contract. We must constantly oversee the activities of our Business Partners. Any red flags or other concerns about the propriety of a Business Partner’s conduct that arise during the course of a relationship with a Business Partner should 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.