

randstad group procedure

misconduct reporting procedure.



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1. purpose and scope

As an international organization with a global emphasis on excellence, the Randstad Group expects all group companies and employees, including directors and officers, to behave at all times in accordance with our core values and Business Principles. This means acting responsibly, with integrity, and in compliance with Randstad policies and procedures, as well as applicable laws and regulations. We expect our employees to help Randstad maintain its excellent reputation by adhering to the high standards reflected in our core values: *to know, to serve, to trust, simultaneous promotion of all interests and striving for perfection*.

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

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

As a result of that Randstad encourage all stakeholders to report incidents, situations and suspicions of Misconduct, Randstad's take a far more broader social responsibility than stated in the Whistleblowing Act (*lagen (2021:890) om skydd för personer som rapporterar om missförhållanden*) both regarding stakeholders and matters to report but also regardless of the size of the Randstad company.

This Misconduct Reporting Procedure is applicable globally to all Randstad Group companies, and all stakeholders may use it to speak up on (suspicion of) misconduct within or relating to the Randstad Group.

2. our procedure - how it works

2.1 introduction

In order to facilitate the reporting of Misconduct (see paragraph 2.2) within or related to the Randstad Group, we have established dedicated channels through which a Stakeholder may voice concerns, either through local reporting mechanisms in place at company level or, for serious misconduct, through a report to the Local Integrity Officer, the Central Integrity Officer, or through our [Integrity Line](#), the Randstad Group speak-up facility (see paragraph 2.3).

Speaking up on potential Misconduct in accordance with this procedure ensures you are protected when you make a report (see paragraph 2.5). All concerns about potential Misconduct raised in accordance with our official procedures will be treated confidentially (except to the extent as required to conduct an adequate investigation (including the right of reply of any person accused) and, if necessary, to take appropriate action) and with the assurance that there will be no retaliation against anyone speaking up.

who may speak up

Our procedure is available for all who wants to speak up ("Stakeholder").

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

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

2.2 misconduct

when to use this procedure

The [Integrity Line](#) can be used to speak up on incidents and situations if you reasonably suspect or have evidence of serious misconduct and/or unlawful behavior within or relating to the Randstad Group ("Misconduct").

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

- Randstad's core values, Business Principles, policies or procedures
- competition and antitrust laws and regulations
- discrimination and racism
- harassment and intimidation
- sexual harassment
- bribery and corruption
- other human rights principles (e.g., modern slavery/forced labor, child labor)
- health and safety failures and environmental issues
- fraud or misappropriation of company assets
- disclosure of confidential information, including personal data
- conflicts of interest
- criminal offenses
- failure to comply with obligations imposed by law or regulations (including incorrect finance and accounting practices), including any breaches of European Union law (see Annex 3).

when NOT to use this procedure

If you have a question about or an issue with your employment conditions or performance review, your registration with Randstad, payroll or timesheet, your promotion or the workplace environment, this Misconduct Reporting Procedure does **not** apply. It also does **not** apply if you have a personal grievance, a conflict with or complaint about your manager or colleague if that does not amount to Misconduct. You may raise those types of concerns via the appropriate local routes, such as your manager, your consultant or relevant branch manager, complaints or customer service line, or HR department.

If you work at a client of a Randstad Group company, any potential misconduct clearly relating to that client may also be subject to the client's reporting procedure.

when in doubt

It will not always be easy to assess whether a concern or situation constitutes Misconduct. If in doubt, you may check with the Local Integrity Officer, or just speak up via the [Integrity Line](#) (see [paragraph 2.4](#)). If you do so, the Local Integrity Officer will review your report and let you know whether it is being followed up as a potential case of Misconduct under this procedure. If not, you will be referred to the relevant function or reporting line.

2.3 where and how to speak up

Any employee who reasonably suspects or has witnessed potential Misconduct is expected to report it.

For many matters, it can be a good first step to talk to the person involved directly, even though this may not always be easy, or to your manager or other regular (local) reporting channels. Even when we facilitate easy and safe speaking up, this should not immediately replace normal dialogue, feedback and Great Conversations, which form the foundation of our core values.

However, if you feel this is not appropriate or you do not feel comfortable doing so, you can report to your Local Integrity Officer and make use of the [Integrity Line](#), or report to the Central Integrity Officer directly or report through internal reporting channel for Randstad AB.

your manager, HR representative, legal counsel, risk & audit, or other trusted role

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

your Local Integrity Officer and the Central Integrity Officer

If your concern relates to potential Misconduct, you may also report directly to your Local Integrity Officer.

The **Local Integrity Officer** is the impartial person or function that ensures that all cases reported to the [Integrity Line](#) as well as those reported to him/her directly, are assessed and then either forwarded to the appropriate team/role for follow-up, or (if the report is assessed as potential Misconduct) investigated and dealt with in a lawful and timely manner, while fully respecting the rights of all individuals involved. Every country/Randstad Group company (including Randstad N.V.) has its own Local Integrity Officer. The Local Integrity Officer may either be a trusted Randstad employee or an external party, as deemed appropriate by the relevant managing director and the Central Integrity Officer.

Local Integrity Officer contact details:

email: localintegrityofficer@randstad.se

address: Rättarvägen 3, Box 3037, 169 03 Solna, Sweden

You may, by your own choice reach out to the Local Integrity Officer by phone or in person, please indicate this in your message.

If the suspected Misconduct involves senior management in your company, you can also reach out directly to the Central Integrity Officer at Randstad N.V.

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

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

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

the Integrity Line: online or by phone

If you suspect or have witnessed Misconduct that cannot be reported via the regular reporting channels (e.g., because these are likely to be inappropriate or ineffective, or because you do not feel comfortable reporting your issue through these channels), you may, as a voluntary option, speak up via the [Integrity Line](#).

Reports can be submitted through the [Integrity Line](#) in the local language or in English, either online or orally (by phone). The [Integrity Line](#) consists of a secure webpage and a telephone hotline, accessible 24 hours a day via free local access numbers. Both are operated by an independent external provider. For full contact details and user instructions, see annex 2.

Although reports may also be submitted anonymously, Randstad encourages you to tell us who you are when you speak up, as this greatly facilitates the investigation of the report.

the [Integrity Line](#) details:

free phone: +46 (0)20-798 813

web access: www.speakupfeedback.eu/web/integrityatrandstad/se

access code: 42112

language options: Swedish, English

The Central Integrity Officer (online only) for the Randstad Group can be reached via:

web access: www.speakupfeedback.eu/web/integrityatrandstad/nl

access code: 55984

language options: English, or your local language (but allow additional time for translation of your message).

Internal reporting channel for Randstad AB as defined in the Swedish Whistleblower Act (Lagen (2021:890) om skydd för personer som rapporterar om missförhållanden).

You can report directly to the [internal reporting channel](#) if your concern relates to potential Misconduct concerning Randstad AB.

The [internal reporting channel](#) details:email:

localreportingchannelRAB@randstad.se

address: Randstad AB, Rättarvägen 3, 169 03 Solna, Sweden

phone: +46(0)70 692 56 09

Reporting through [Internal reporting channel](#) is possible both orally and in writing. You have also the right to book a meeting for reporting the matter.

To remain anonymous, you need to ensure that you use tools that do not state your identity, for example, you can send letters without your name or call from a phone that does not state your identity etc.

The [Local Integrity Officer](#) receives your concern of potential Misconduct, maintain contact with you, and follow up and provide feedback to you.

The [Local Integrity Officer](#) is the impartial person or function that ensures that all cases reported to the [Integrity Line](#) as well as those reported to him/her directly, are assessed and then either forwarded to the appropriate team/role for follow-up, or (if the report is assessed as potential Misconduct) investigated and dealt with in a lawful and timely manner, while fully respecting the rights of all individuals involved. Every country/Randstad Group company (including Randstad N.V.) has its own Local Integrity Officer. The Local Integrity Officer may either be a trusted Randstad employee or an external party, as deemed appropriate by the relevant managing director and the Central Integrity Officer. If, after careful consideration, you do not feel comfortable to speak up within established internal reporting channel specific facilitated for Randstad AB you are free to, voluntary, use other channels that Randstad has facilitated for reporting of Misconduct.

speaking up anonymously

If you want to report anonymously, Randstad strongly advises that you report through the [Integrity Line](#). This allows us to handle your report of potential Misconduct in the most efficient way, helps to minimize unreliable and false reports, best protects the privacy of everyone involved, and enables the Local Integrity Officer and/or Central Integrity Officer to communicate efficiently with you. Randstad does not need to know who you are, but using the [Integrity Line](#) makes safe dialogue possible.

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

Additional instructions with respect to anonymous reporting may be available in your country.

what to include when you speak up

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

Consider the following aspects when you speak up:

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

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

You may not be able to address all aspects, but the more information we have, the better we can assess and follow up. When you report via the [Integrity Line](#), the Local Integrity Officer and/Central Integrity Officer may reach out to you (also via the [Integrity Line](#)) with further questions.

reporting outside the Randstad Group

If, after careful consideration, you do not feel comfortable to speak up within the company, it may (subject to specific conditions set by local legislation) be possible to raise your concern outside the company. This procedure is not meant to limit your rights to report the potential Misconduct outside of the Randstad Group nor to limit your protection where external reporting is a possibility under local law. You will still be entitled to protection in the same manner as when reporting internally if, as examples only,

- in the situation where you have first reported internally, no response was provided to your report within the timeframe set in paragraph 2.4;
- in spite of our clear commitment in this procedure, you seriously fear there is a risk of retaliation;
- the breach you suspect or have evidenced constitutes an imminent or manifest danger to the public interest (an emergency situation or a risk of irreversible damage).

However, reporting externally to a local authority or publicly is an impactful step. To understand all conditions involved, and what can or cannot be reported externally, please see the website of the competent authorities in your country of residence.

Applicable local authorities are presented in the Ordinance (2021:949) of protection of persons Reporting on Workplace Irregularities (*sw förordning (2021:949) om skydd för personer som rapporterar om missförhållanden*). <https://www.riksdagen.se/sv/dokument->

Whenever you are considering this, we strongly recommend that you seek advice and not do this alone. Above all, we strongly encourage that you speak up within the company first, so you can hand the burden over to us, and we will be able to look into the matter immediately.

If you decide to report potential Misconduct externally while an investigation by a Randstad Group company is ongoing, the company may decide to no longer involve you in that investigation, to stop the investigation, and/or take any other steps it considers necessary.

2.4 handling of reports made via the Integrity Line or directly to the Local Integrity Officer

Reports received through the [Integrity Line](#) are shared with the Local Integrity Officer for the company concerned. As standard, a copy of the report is also sent to the Central Integrity Officer at Randstad N.V.

Both the Local Integrity Officer and the Central Integrity Officer are impartial functions. The [Integrity Line](#), the Local Integrity Officer, and the Central Integrity officer offer a secure way to speak up. This way of speaking up ensures you are using reporting channels that protect your confidentiality as well as that of third parties. Access to non-authorized persons is restricted.

initial assessment and response

The Local Integrity Officer will confirm to you the receipt of your report, received directly or through the [Integrity Line](#), within seven days of receipt. The Local Integrity Officer will also inform you whether the matter reported is assessed as a potential Misconduct, or whether it is a matter that should be handled through the normal (local) reporting procedures (e.g., HR representative, client contact, payroll, complaints, or customer service & support line). If further information is required to make this assessment, this will be addressed in the response message.

If the matter should be handled through the normal (local) reporting procedures, the Local Integrity Officer will provide the relevant details in the response message, or contact the relevant local function to handle the report, depending on the nature of the message and the contact details that you provided.

the investigation and feedback

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

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

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

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

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

At the latest three months from the acknowledgement of receipt, the Local Integrity Officer will provide feedback. If the investigation is not yet concluded at that time, further feedback will be provided again at a later moment. Please note that it is not always possible to share the details of

the progress or outcome of the investigation for reasons of confidentiality, privacy and the legal rights of the parties involved. All parties are entitled to confidentiality, including the accused. Therefore, if you participate in or learn about an investigation, you must also keep the matter confidential.

the Central Integrity Officer

If the potential Misconduct involves one or more members of the local management team of a Randstad Group company, the Local Integrity Officer will redirect the report to the Central Integrity Officer. The Central Integrity Officer may inform local management and will inform the responsible member of the Randstad N.V. Executive Board and/or the Audit Committee of the Supervisory Board, subject to confidentiality and there being no potential conflict of interest.

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

conclusions and actions taken

After the investigation is concluded, prompt and appropriate corrective action will be taken when and as warranted in the judgment of the relevant management level, taking into account the relevant company functions (e.g., HR, Legal). Corrective action in the event of proven Misconduct may vary from a written warning, coaching, and/or apologies to those affected by the Misconduct through to the suspension or termination of the contract of or relationship with those responsible for the Misconduct, reporting to the appropriate authorities, and/or any other action relevant to the specific Misconduct.

2.5 protecting your rights when you speak up via the Integrity Officer and/or Integrity Line and/or Internal reporting channel

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

Below, some key principles are highlighted.

confidentiality

All concerns raised via the [Integrity Line](#) or with the [Local Integrity Officer](#) directly are treated as confidential to the maximum extent, including your identity, consistent with the need to conduct an investigation (and, if necessary, take appropriate action). This also applies to anyone assisting you when speaking up in a work-related context. Exceptions to confidentiality are possible when Randstad is under a legal or regulatory obligation to disclose the information, or if the report is made in bad faith.

Information will only be shared with a limited number of authorized people directly involved in the investigation on a strict need-to-know basis. This may include external advisors involved in an investigation. Your identity and other information from which your identity may be deduced will not be disclosed to anyone beyond these people without your explicit consent. Depending on the purpose of sharing, the Local Integrity Officer will (further) anonymize the information prior to sharing it.

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

When you speak up in accordance with this procedure, Randstad is committed to treating your report seriously and with care. Randstad expects that you treat it in the same manner, also respecting confidentiality to the extent possible, in accordance with your contractual and confidentiality obligations. This does not restrict you from reporting externally or publicly where

this is possible under local law, in accordance with the specific requirements for such reporting, or from seeking (legal) advice in relation to your reporting (see paragraph 2.3, reporting outside the Randstad Group).

privacy/data protection

Any personal data obtained as part of any report and investigation under this procedure (including of the person speaking up, any person under investigation, and any witnesses) will only be used for the purposes described in this procedure and in accordance with relevant data protection laws and Randstad's data protection policy. Personal data that is clearly not relevant for handling of a specific report shall be deleted without undue delay.

Personal data on the [Integrity Line](#) will be deleted by the Local Integrity Officer three months after a case is closed. Personal data collected as part of an investigation may be retained for a longer period if this is required due to the nature of the allegations and/or investigation up to the maximum statutory limitation period, but no longer than is necessary and proportionate.

Personal data will only be shared with those who need to know and will be subject to an obligation of confidentiality to the extent possible and as consistent with the need to conduct an investigation and, if necessary, take appropriate action. Exceptions are possible if Randstad is under a legal or regulatory obligation to disclose the information or if the report is made in bad faith.

When it comes to very serious complaints processing of personal data related to Misconduct Reporting Procedure may only be done in respect of people in key positions or management positions in Sweden.

Note that this does not mean that you cannot register very serious infringements outside said position groups in the organization, for example, very serious cases of discrimination or harassment, etc. Then you describe the situation and the context together with timelines. If the case is not a very serious (not a crime level) complaint you are allowed to report all individuals.

Very serious complaints that can harm individuals, Randstad or the environment, could be;

- financial crimes, for example bribery, corruption, theft, fraud and falsification,
- false accounting and other infringements of accounting and tax legislation,
- a conflict of interests between an employee and Randstad (such as corruption), or
- other serious irregularities that affect Randstad's vital interests or the life and health of individuals, such as serious environmental crimes, major deficiencies as regards safety in the workplace, as well as very serious forms of discrimination and persecution.

For Randstad companies in Sweden, this means that people in the following positions can be reported as an individual:

- Member of Board of Directors in Randstad Sweden Group AB,
- Member of Board of Directors in Randstad AB,
- Member of Board of Directors in Randstad RiseSmart AB,
- Member of Randstad in Sweden management team,
- Managers Support functions and,
- Director of Randstad Staffing, In-house and Professionals

appendix 4 handling personal data

appendix 5 list of named persons who can be reported individually

non-retaliation

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

Randstad will not retaliate against anyone reporting potential Misconduct. For example, Randstad will not discharge, demote, suspend, threaten, harass, or in any manner discriminate against

anyone reporting potential Misconduct. This also applies to the person who assists the person speaking up in a work-related context.

The right of non-retaliation is guaranteed under the Business Principles, and violation of this right will not be tolerated. Any form of threat or retaliation aimed at speaking up may lead to disciplinary measures.

If you notice or experience any threat or retaliation, you can report this via the [Integrity Line](#) or directly to the Central Integrity officer.

When you speak up in accordance with this procedure on Misconduct in which you have participated yourself, Randstad will consider taking this into account as a mitigating factor when assessing the consequences of such Misconduct.

exception: reporting in bad faith

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

If appropriate, the Randstad Group may take further action (including disciplinary action) against anyone who knowingly makes a report in bad faith.

2.6 protecting the subject of an investigation

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

The person under investigation of a potential Misconduct will normally be notified of this fact within a reasonable timeframe, depending on the facts and circumstances and whether there is a perceived risk of destruction of evidence, retaliation and/or obstruction of the investigation.

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis.

The person under investigation has the right to respond to the allegations and can appeal against any adverse findings or decisions.

3. accountability and disciplinary action

The Randstad N.V. Executive Board has overall responsibility for the Misconduct Reporting Procedure and its application. Management of each Randstad Group company is obliged to ensure that this Misconduct Reporting Procedure is implemented within their organization, and the Local Integrity Officer can function in accordance with this procedure.

Randstad expects management at all levels within the Randstad Group to handle all reports concerning any potential Misconduct seriously, confidentially, and in an expeditious manner, and to ensure that the reporting person is not confronted with threats or retaliation. Management is obliged to fully cooperate with any investigation into potential Misconduct.

Failure to comply with this procedure, including threats or retaliation against anyone speaking up in accordance with this procedure, and failure to take reasonable steps or reasonable care to protect the identity of the person speaking up may be subject to disciplinary action.

The Randstad N.V. Executive Board, after consultation with the Supervisory Board, may amend this procedure at any time in a manner consistent with the requirements of applicable laws and regulations, and will involve the Randstad European Works Council. Where relevant the local Works Councils will be involved for local implementation.

document control

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