



GROUP POLICY – HUMAN AND LABOUR RIGHTS

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| Effective date: 01.01.2023 |
| Last modified: 11.12.2022 |
| Document No. GP 09.01 (001) |
| Replaces: Human and Labour Rights Guidelines v2017 |
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Definitions

In the context of this Group Policy:

¹ “Adecco Group” collectively means the Adecco Group AG, its business divisions, subsidiaries, and affiliated companies throughout the world. This also includes those joint ventures in which Adecco Group AG, directly or indirectly, has either majority ownership or management control. The terms “we”, “us”, or “our” refer to the Adecco Group.

² “Associate” means an individual placed with an Adecco Group Client, on a flexible placement type of engagement (i.e., with a fixed end-date, temporary), typically working under the direct supervision of the Client.

³ “Candidate” means an individual applying for a position who has not yet been hired, either for a position within the Adecco Group or with a Client.

⁴ “Client” means a third-party which receives goods or services from the Adecco Group but has no authority to make legally binding commitments on behalf of the Adecco Group.

⁵ “Colleague” means an individual who is under employment contract/engagement, subject to local government employment law, working for an Adecco Group legal entity and who is under the supervision, direction, and control of the Adecco Group. This includes those on open-ended contracts, fixed-term contracts, temporary contracts, and work-based learning programme participants (e.g., apprentices, interns).

⁷ “Consultant” means an individual who is under employment contract/engagement, subject to local government employment law, working for the Adecco Group legal entity, with a permanent or fixed-term contract, and is placed with clients for consulting work or projects, and remains under the supervision, direction and control of the Adecco Group.

⁸ “ESG” means Environmental, Social and Governance, which includes consideration of risks, opportunities, and impacts.

⁹ “Human Rights” means the fundamental, universal rights and freedoms that every human is entitled to, without discrimination.

¹⁰ “Labour rights” means legal and human rights relating to labour relations between workers and employers, codified in national and international labour and employment law.

¹¹ “Supplier” means a third-party which provides goods or services to the Adecco Group but has no authority to make legally binding commitments on behalf of the Adecco Group.



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1. Purpose

¹ The Adecco Group is committed to maintaining the highest standards of responsible business conduct and consistently embedding environmental, social and governance (ESG) considerations in its business operations. The objective of this Policy is to articulate and formalise the Adecco Group's commitment and approach specifically related to respecting, upholding, and promoting internationally recognised Human and Labour Rights.

² The Policy sets out the Group's commitments and global minimum standards in this area and describes the responsibilities and processes by which we will implement these. More stringent rules or a wider applicability may be put in place for certain areas of our business and/or at country level as deemed necessary by the respective leadership or as required by national law.

³ The Policy furthermore reflects our commitment to respect national labour and employment laws as well as international general and sector specific standards as set out in Annex A and contribute to the UN Sustainable Development Agenda.

2. Scope and applicability

¹ This Policy is mandatory and applies worldwide to the Adecco Group. When the Adecco Group establishes new joint ventures, we will work to include these standards as part of the joint venture agreement.

² The Policy applies to us all: Board members, Colleagues, Consultants and Associates of the Adecco Group and all its subsidiaries, and everyone providing services on behalf of the Adecco Group. It is also a commitment, to ourselves but also to our Colleagues, Consultants, Associates, Candidates, Clients, and all other stakeholders.

3. Overarching principles

3.1 We respect internationally recognised Human and Labour Rights

¹ We are committed to respecting all internationally recognised Human and Labour Rights relevant to our operations. See Annex B for a list of rights we have identified as most likely to be affected – directly or indirectly – by the business activities of a talent solutions and advisory company like ours.

² Where national law and international Human Rights standards differ, we seek to uphold the standard offering greater protection for our Colleagues, Consultants and Associates. Where they are in conflict, we will adhere to national law while seeking ways to respect international Human and Labour Rights to the greatest extent possible.

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3.2 We do not cause or contribute to negative Human and/or Labour Rights impacts

¹ We are committed to not causing or contributing to adverse Human and/or Labour Rights impacts in areas which we can directly influence (direct impacts). We address such impacts when they occur to the best of our abilities. Wherever feasible, we also strive to take steps to identify, prevent or mitigate adverse Human and/or Labour Rights impacts that are linked to our operations, products, or services, or through our business relationships (indirect impacts).

² We apply extra care in circumstances where Human and Labour Rights may be particularly at risk given our business activities, such as in the context of cross-border recruitment and internal migration, or in the case of activities that involve individuals or groups who may be particularly vulnerable such as migrants, refugees, women, persons with a disability, or young workers.

4. Responsible recruitment and employment practices

4.1 We promote equity, diversity, and inclusion across an individual’s journey with us

¹ We believe in talent, not labels, and focus on the diverse and unique skills our people bring.

² We promote and maintain an inclusive and diverse culture and environment of respect and equal opportunity for everyone working with, through or for the Adecco Group, where people are treated with dignity and fairness, individual differences are valued, and everyone feels comfortable about expressing opinions and contributing ideas.

³ We prohibit any form of discrimination of or by any Colleague, Consultant, Associate, Candidate, or person providing services on behalf of the Adecco Group, at any stage of that person’s journey with us – from recruitment to compensation, access to training and promotion, to termination or retirement. This includes but is not limited to any discrimination on the basis of gender, sexual orientation/LGBTQIA+/gender identity or gender expression, family/marital status, pregnancy, age, ethnicity, heritage, nationality, social or economic background or origin, caste, religion/creed, political opinion, physical appearance, disability (visible or invisible), union membership, or any other personal characteristics protected by applicable laws where the Adecco Group operates.

⁴ When we choose which individual to place with a Client, the decision is to be based solely on that person’s qualifications and merit.

⁵ Exceptions may be permissible where selectivity concerning an individual’s characteristics is intended to advance established governmental policies which specifically promote greater equality of employment opportunity or relates to the inherent requirements of a job.

4.2 We are against any form of modern slavery, including forced and child labour

¹ We are against the use of any form of modern slavery, including forced, bonded, prison and/or indentured labour, and human trafficking, across any of our operations. All employment must be voluntary, and worker’s assent obtained without coercion.

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² We prohibit the employment of individuals that have not reached the national legal minimum age required for work, and shall never support the use of child labour, i.e., work that is dangerous or harmful to children and/or prevents their schooling.

³ In support thereof, we

- Do not charge directly or indirectly, in whole or in part, any fees and related costs¹ to jobseekers and workers for the services directly related to temporary assignment or permanent placement (Employer Pays Principle) or require workers to provide a monetary deposit or other collateral as a condition of employment.
- Do not withhold wages but ensure they are paid regularly, directly and on time.
- Do not retain original identification documents, passports or other residency papers, or any other personal possessions.
- Do not restrict the right of Colleagues, Consultants or Associates to leave employment (subject to reasonably agreed notice periods) .
- Verify age and eligibility to work at the time of employment.

⁴ The Adecco Group supports and may engage in the use of official government approved educational youth training or work-based learning schemes such as apprenticeships. For young workers under the age of 18 we provide closer supervision and support and conduct proportionate risk assessment according to the role undertaken.

4.3 We ensure safe and decent employment and working conditions

¹ We transparently, clearly, and unambiguously describe the rights and obligations of Colleagues, Consultants and Associates in their respective contracts. We provide details of their working conditions, the nature of the work to be undertaken, rates of pay and pay arrangements, and working hours.

² We strive for equitable, objective, fair, and competitive compensation for Colleagues, Consultants and Associates, considering national legislation, collective agreements and/or industry benchmarks.

³ We are committed to providing safe and healthy workplaces and a working environment that meets all applicable standards, including one free of physical or sexual violence, and will not compromise on health, safety, and wellbeing measures. We ensure that working hours comply with the respective statutory provisions, collective agreements and/or applicable industry standards, and that reasonable work breaks are provided for. Where we do not directly control the work environment that we place our Consultants, Associates and Candidates in, we seek to ensure they are properly trained and equipped for the respective role ahead and that their working environment meets at a minimum applicable local health and safety requirements and work standards.

¹ As defined in the ILO General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs - https://www.ilo.org/global/topics/labour-migration/publications/WCMS_536755/lang--en/index.htm



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⁴ We do not tolerate any form of harassment, bullying, stalking, or intimidation within our work context.

⁵ We protect and properly handle all personal data in accordance with applicable data protection and privacy laws. Further details are set out in the Data Protection Policy (GP 01.13/003).

⁶ We are committed to the continuous up- and/or reskilling of our people to ensure their continued employability, by offering a broad spectrum of learning and development opportunities.

4.4 We respect the right to freedom of association and collective bargaining

¹ We recognise the important role that social dialogue plays in safeguarding Human and Labour Rights. We respect the right to join a trade union or employee association and to bargain collectively.

² We do not make Associates available to a Client to replace workers of that Client who are legally on strike.

³ We maintain constructive dialogue with our Colleagues and/or workforce representatives and engage in social dialogue with work councils and/or trade unions at local, regional, and sectoral level as necessary and according to local laws and regulations.

5. Respecting Human and Labour Rights across our value chain

¹ We have a large and diverse extended value chain and recognise that part of our impact on society as well as the opportunity to create positive Human Rights impacts is linked to our Clients, Suppliers, and other third parties we engage with.

² In our business engagements, we ensure the fair treatment of all Clients, Suppliers, and other third parties. We protect and handle their data in a responsible manner and safeguard their privacy.

³ We strive to carefully select business partners and expect them to adopt the same Human and Labour Rights principles and standards as the Adecco Group, as further defined in our third party code of conduct, evolving business acceptance standards, purchasing policies, third party due diligence framework, compliance screening, and onboarding requirements, and wherever feasible make this part of our contractual agreements. We expect our Suppliers to extend these standards to their own suppliers and business partners. We take extra care in assessing Suppliers that take over parts of a recruitment supply chain.

⁴ We strive to regularly assess and re-evaluate our business relationships to the best of our abilities, as new information becomes available and best practices evolve.

⁵ Should we become aware of practices that are irreconcilable with this Group Policy, our values, and overarching sustainability approach, wherever possible we will first strive to exercise our leverage and work in collaboration with our business partners to remediate the situation and ensure respect for Human and Labour Rights is restored. In severe and/or persistent cases of Human Rights

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violations and/or where remediation is not possible, we may ultimately remove ourselves from such a business relationship or activity.

⁶ Where possible, we work hand in hand with our business partners to advance the respect for Human and Labour Rights overall and to develop solutions that help increase employability and facilitate access to decent work particularly of underrepresented groups (e.g., refugees, persons with a disability).

6. Regular risk assessment, monitoring, and stakeholder dialogue

¹ We strive to regularly identify and assess Human and Labour Rights risks and perform corresponding risk-based due diligence to the best of our abilities, assessing actual and potential Human and Labour Rights impacts across our business activities. Human Rights due diligence is both an integral part of the Group’s overarching enterprise risk management and stand-alone exercise for areas that require particular attention at certain stages in our business activities, such as when we recruit individuals and/or place them into work assignments or when we onboard new suppliers.

² We strive to regularly monitor our performance, including through the integration of relevant elements in our internal control standards and corresponding audit processes.

³ We publicly communicate our commitments, approach, and continuous efforts to embed the respect for Human and Labour Rights in our company culture and across our operations, primarily in our annual report and on the Adecco Group website.

⁴ We engage in ongoing dialogue with relevant stakeholders on these important topics – whether directly or through relevant industry associations such as the World Employment Confederation. This Policy was developed in consultation with Colleagues from across the world as well as external human rights experts.

7. Roles and Responsibilities

7.1 Adecco Group Board of Directors

¹ The Adecco Group Board of Directors has ultimate responsibility for the overall strategic direction and oversight of the Group’s sustainability and ESG principles and measures, which extends to Human and Labour Rights. It has assigned certain of these duties and responsibilities to its committees: the Governance and Nominations Committee oversees the Group’s related strategy, initiatives, and targets, reviews the related principles, and jointly with the Audit Committee periodically reviews the Group’s progress against relevant targets as well as corresponding reporting.

7.2 Group Executive Committee

¹ The Group Executive Committee approves and reviews the Group’s sustainability and ESG approach, which extends to Human and Labour Rights. Its members play a critical role in helping

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ensure that Human and Labour Rights are respected across the Group and embedded in corporate culture and daily operations, by providing visibility and leadership support.

7.3 Business and function leaders

¹ Business and function leaders across the Group are responsible for integrating the Human and Labour Rights commitments and principles as set out in this Policy and related documents into business decisions and daily operations, and for striving to continuously strengthen the respect for Human and Labour Rights within their respective area of responsibility.

7.4 All Colleagues and Consultants

¹ All Colleagues and Consultants must familiarise themselves with this Policy and complete the attestation process as it is rolled out. They are expected to adopt and maintain behaviours at work that respect Human and Labour Rights and must apply the principles set out in this Policy within the scope of their duties.

² Colleagues and Consultants must participate in periodically held training sessions on Human and Labour Rights (such as e.g., our Code of Conduct training). Training may differ depending on their roles and exposure to material issues.

7.5 Group Sustainability & ESG function

- ¹ The Group Sustainability & ESG function is the owner of this Policy. It is responsible for:
- Overseeing the development and regular review of this Policy.
 - Implementing this Policy and working with representatives from across the Group to ensure that relevant commitments and principles are integrated into the Group's activities and processes.
 - Developing improvement targets and implementing measures to monitor the Group's progress against these targets where appropriate and regularly reporting on the Group's approach and progress.
 - Driving awareness and education among Colleagues and Consultants to foster a culture that respects Human and Labour Rights.
 - Ensuring this Policy is easily accessible and communicated appropriately to relevant stakeholders.

8. Access to Remedy

¹ Anybody who believes that a breach of the standards of this Policy has occurred or is likely to occur is encouraged to report their perceptions through the established reporting channels² without delay. Concerns can be reported anonymously. We prohibit any form of retaliation, intimidation,

² <https://www.adeccoagroup.com/our-group/about-us/reporting-misconduct/>

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or disciplinary action against anyone who makes a report of misconduct in good faith, or conducts or participates in an investigation, even if it is ultimately concluded that no misconduct occurred.

² We will appropriately and effectively remediate, or cooperate in remediating, any adverse Human and/or Labour Rights impact for which we are responsible or with which we may be involved or associated as we become aware of it, to the best of our abilities.

9. Breaches of this Policy

¹ Failure to comply with the principles of this Policy may result in disciplinary action as deemed appropriate, up to and including termination of employment; violations may also result in civil or criminal action under applicable laws.

² We may terminate our relationship with other individuals or organisations working with us or on our behalf if we find them to act in violation of the principles of this Policy.

10. Cross-reference to other policies

¹ This Policy should be read in conjunction with other relevant policies and documents such as the Adecco Group Code of Conduct, the Supplier code of conduct, the Group Data Privacy Policy, and further global and (as applicable) country-level policies, guidelines or other documents addressing topics including but not limited to terms of employment, health & safety, non-discrimination or workplace conduct, modern slavery, data security and privacy, business acceptance, and integrity and compliance (including report management and investigations).

11. Third-party rights

¹ This Policy is proprietary material of the Adecco Group. It does not, and shall not be construed to, create any obligation on the Adecco Group to any individual or entity, including any Client, Supplier, Colleague, Consultant, Associate, or any Third Party under any theory of law, including tort, negligence, contract or any equivalent or similar legal concepts anywhere in the world.

12. Questions

¹ If you have any questions about this Policy, the way it should be implemented, or Human and Labour Rights in general, please contact the Group Sustainability & ESG function at sustainability@adecgroup.com.

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13. Approval and amendments

¹ The body of this Policy has been approved by the Adecco Group CEO on 18 December 2022. It is effective as of 1 January 2023 and replaces “The Adecco Group Human and Labour Rights Guidelines v2017”.

² The Adecco Group may update this Policy as necessary to reflect changes in law, regulatory guidance and/or best practices and to ensure continued applicability and that it remains fit for purpose. Changes to this Policy will be notified via the regular channels.

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ANNEX A. International standards

In our efforts to respect and uphold all internationally recognised human rights, we are guided by some of the most authoritative international norms and standards in this field. These include:

- The International Bill of Human Rights, consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights
- The core labour conventions of the International Labour Organization (ILO), including the ILO Declaration on Fundamental Principles and Rights at Work and the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- The ten principles of the UN Global Compact, which we committed to in 2003 as first company in our industry
- The UN Guiding Principles for Business and Human Rights
- The OECD Guidelines for Multinational Enterprises
- The Dhaka Principles for Migration with Dignity.

We furthermore follow sector specific standards such as:

- ILO Convention 181 on Private Employment Agencies and linked to that ILO Recommendation 188
- the World Employment Confederation Code of Conduct
- the EU Guide on Business and Human Rights for the Employment and Recruitment Sector.

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ANNEX B. List of potential risks to people

According to our assessment, the following rights are the most likely to be affected, directly or indirectly, by the business activities of a talent solutions and advisory company like ours:

- Right to work and free choice of employment
- Right to just and favourable conditions of work, in our own operations, within our client's operations and our supply chain
- Right to equality, non-discrimination, and non-harassment
- Right to equal pay for equal work; right to just and favourable remuneration ensuring for themselves and their family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection
- Right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay
- Right to privacy
- Right to health and well-being at work
- Prohibition of all forms of modern slavery; forced, bonded, and indentured labour; human trafficking
- Elimination of unlawful child labour
- Freedom of association and collective bargaining, right to form and join unions and to strike
- Freedom to speak up and raise grievances

This does not exclude that potential or actual adverse impacts on other Human Rights than the ones presented could also arise from our business activities.

Special attention may be warranted where particular vulnerabilities exist e.g., in the context of cross-border recruitment or internal migration, or activities that involve individuals or groups who may be at greater risk of having their Human Rights infringed due to their vulnerability or marginalisation such as e.g., refugees, women, persons with a disability, or young workers.

* * *