

randstad group policy

human rights.



 randstad

human forward.

# human rights policy.

June 2021  
Function: Executive Board  
Document number: HRP version2 22062021

## 1. purpose

In line with our core values and Human Forward strategy, Randstad believes that everyone is entitled to be treated with dignity and respect. As the global leader in the HR services industry, we recognize our role in society and our responsibility to respect human rights. We are committed to preventing or mitigating adverse human rights impacts that are caused by or linked to our operations and services, and addressing such impacts if they occur.

Randstad is a signatory of the United Nations Global Compact and respects and supports all its principles, including those regarding human rights and labor. Randstad supports the 'Protect, Respect and Remedy' Framework, including the Guiding Principles on Business and Human Rights as endorsed by the UN Human Rights Council. For Randstad, our company's corporate responsibility to respect human rights also means adherence to the International Bill of Human Rights and the fundamental rights set out in the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work (see the annex for these and other relevant documents).

The relevant ILO principles and rights related to labor, which are also supported by our core values and embodied in our Business Principles, are the following:

*Freedom of association and the right to collective bargaining, elimination of all forms of forced or compulsory labor, effective abolition of child labor, and elimination of discrimination in respect of employment and occupation.*

In this Human Rights policy, we set out the leading principles with regard to human rights for Randstad, all our employees, directors and officers (hereafter: employees), and the talent we serve, as well as the expectations we have of our external stakeholders.

This policy is consistent with and supportive of Randstad's Business Principles, and in particular:

1. We know and comply with international human rights principles, Randstad's internal policies and procedures, and the laws that govern our business.
8. We treat others fairly, act with care and consideration, and respect human rights. We do not tolerate intimidation or harassment in any form.
9. We respect the right to privacy, ensure that confidential information is kept confidential, and we do not abuse the confidential information of others.

11. We value diversity and inclusion. We are committed to equal opportunities and do not discriminate on the grounds of age, skin color, disability, gender identity, marital status, nationality, race, ethnic origin, religion, cultural background, sexual orientation, or any other irrelevant or illegal characteristics.
14. We regard health and safety in our business as the utmost priority. This includes both our own employees and our placed workers.

## 2. what we do and what we expect from our internal and external stakeholders

People are at the core of our services. Our ultimate goal is to touch the work lives of 500 million people by 2030. When working for Randstad, we expect our employees to understand and promote the importance of our human rights responsibilities in relation to all stakeholders, both within the Randstad Group and in any external business relationships. This includes colleagues, talent, clients, suppliers and all other stakeholders with whom employees come into contact as part of their job.

We are especially committed to protecting those groups of people that are more vulnerable in the labor market. Vulnerable groups may vary per country and/or region, and may include women, children, disabled people, migrant workers, the LGBTI+ community, indigenous people, racial and ethnic minorities, and the long-term unemployed.

### 2.1 employees, job seekers and placed workers

Randstad employees are supported in taking all reasonable measures to avoid Randstad being involved in or contributing to human rights violations in our operations, services, or business relationships with employees, job seekers, placed workers, contractors, the self-employed, and any others. They can all expect to be protected from any human rights violations on the part of Randstad, and we equally expect them to respect our standards.

All new employees receive information related to this policy in their induction program, and all employees have to complete mandatory compliance induction and refresher training, which includes training on human rights principles in so far as they are relevant to their work.

### 2.2 management

Management, including our directors and officers, have additional obligations. They are responsible for acting in accordance with Randstad's core values and ensuring compliance with this policy. This also means being responsible for supporting the compliance efforts of those reporting to them, explaining our principles to their teams, and ensuring compliance within their area of responsibility, which necessarily requires active communication.

### 2.3 clients and suppliers

When we interact with our clients, we expect them to act in accordance with all relevant human rights principles, especially those that may impact our job seekers, placed workers, and employees. We will request all information on issues or situations that may impact the working conditions of our placed workers, and will discuss any potential human rights issues, breaches and suspected breaches. Breaches of human rights principles by clients may result in Randstad ceasing to do business with them. We aim to support our clients in achieving some of their own human rights principles, especially in the areas of diversity and inclusion, health and safety, and non-discrimination.

When we interact with our suppliers (including agents, contractors, and their suppliers and subcontractors), as set out in our Global Supplier Code, we also expect them to act in accordance with all relevant human rights principles. Randstad may audit these parties and, in the event of non-compliance, Randstad will discuss how future compliance can be ensured, any existing risks

can be mitigated, and consequences can be addressed. Continued non-compliance will result in termination of the supplier contract.

## 3. Randstad's leading principles

Given the nature of our services, certain human rights stand out, because they are liable to have the greatest negative impact through Randstad's activities and business relationships. Together with our internal and external stakeholders, we have therefore identified the most important issues to focus on. These are outlined below.

### 3.1 our principles

#### diversity and inclusion

We value diversity of people and thought, and are aware of cultural differences. Diverse ideas, cultures and perspectives break down subconscious barriers and help build better-performing teams of more well-rounded employees. Inclusion is a reflection of our company culture, where every individual feels valued, respected and supported. Our willingness and the ability to recognize, understand, respect and then fully utilize the unique contributions of each individual will help them achieve their highest potential. Inclusion is one of the preconditions for innovation and success, because it fosters the right conditions for optimal performance. This is expressed in active and explicit support for specific groups and topics, such as the LGBTI+ community, the young professional community, gender equality, etc.

The details of our approach to diversity and inclusion can be found in our [Randstad Group Diversity and Inclusion Policy](#).

At Randstad, we are uniquely positioned to champion diversity as a means of creating new opportunities for employment and economic development on a global scale.

#### non-discrimination and equal opportunities

An action or practice is **discriminatory** if it unjustly disadvantages people, whether directly or indirectly<sup>1</sup>, on the basis of characteristics that are not relevant to the situation (e.g., age, skin color, disability, gender identity, marital status, nationality, race, ethnic origin, religion, cultural background, sexual orientation, or any other irrelevant or illegal characteristic).

We aim to make sure that everyone at Randstad (including both employees and talent) is treated fairly and with dignity and is not discriminated against based on characteristics that are not relevant to the situation. This also applies to our relationships with clients and suppliers.

We are committed to providing equal opportunities in all phases of employment, including but not limited to recruitment, hiring and termination, opportunities for growth, development and promotion, the selection of employees for training programs, and the determination of wages and benefits. This includes ensuring that our clients avoid discrimination in relation to talent or Randstad colleagues, and it allows our employees to cease doing business with a client in the event of discriminatory practices. We challenge any client who might try to place a discriminatory job order, and we do not place discriminatory job advertisements: we either make it lawful or we decline the request.

It may not always be clear that a request is discriminatory for a particular group. For example, a client may only take into account a candidate's accent if the accent materially interferes with the ability to perform the specific job duties. Fluency in the local language should reflect the actual level of proficiency required for the requested position. It may be a requirement for workplace safety or for a specific cooperative work assignment, but it has to be assessed on a case-by-case basis to avoid indirect discrimination.

We expect employees to discuss any doubts internally with colleagues and/or their manager, and/or to reach out to Randstad Legal for support.

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<sup>1</sup> **Indirect discrimination** is a policy or practice that appears to be neutral, or the same for everyone, but which, in operation, results in a particular person or group being adversely affected or excluded from a benefit, and which policy or practice cannot be objectively justified.

## no harassment, intimidation or bullying

**Harassment, intimidation or bullying** is any unwanted physical, verbal or other conduct that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive work environment. It may include offensive or demeaning remarks, abuse of power, inappropriate touching, unwelcome sexual advances, and any other unwanted conduct.

We value respect in the work environment and do not tolerate any form of intimidation, bullying or harassment, including sexual harassment. Some examples of such unwanted behavior are physical or verbal abuse and coercion, violence, making offensive or sexually explicit jokes or insults, displaying and distributing offensive material or material of a sexually explicit nature, unwelcome sexual advances or requests for sexual favors, misusing personal information, creating a hostile or intimidating work environment, isolating or not cooperating with a colleague, or spreading malicious or insulting rumors. An intimidating, hostile or offensive working environment interferes with work performance and will adversely affect an individual's employment conditions. We challenge any client or supplier who appears to engage in such practices.

## privacy

We respect the right to privacy of all stakeholders. No one shall be subjected to arbitrary interference with their privacy, family, home or correspondence, nor to attacks upon their honor or reputation. We expect our employees and business partners to treat all personal data in an appropriate and lawful manner, respecting the rights and interests of each individual. For this purpose, [Randstad's Group Data Protection Policy](#) sets out the minimum compliance standards for collecting and processing personal data and provides consistent safeguards for the handling of personal data by Randstad.

We ensure that the personal data we handle is collected and processed fairly and lawfully and used in a manner appropriate for the purpose for which it was collected. We take all necessary measures to ensure the accuracy, security and confidentiality of stored personal data, and do not keep it longer than is required to fulfill its business purpose. Particular care is taken when transferring personal data to third parties, including our clients, to ensure an adequate level of protection for such personal data.

Through our privacy statements, we inform all relevant data subjects of the ways in which we handle their personal data.

## protection of health and safety

We are committed to providing and maintaining a healthy and safe work environment and promoting mental health and well-being at work. We will do all that is reasonably practicable to prevent personal injury and illness and to protect our placed workers and employees, as well as job seekers, clients, suppliers and visitors, from foreseeable work hazards. In accordance with our [Global Health & Safety Policy](#), we are committed to complying with all applicable legal requirements and local standards.

Our guiding principle is that all decision-making is also based on protecting the inherent safety of our placed workers and employees. This includes the development and maintenance of our systems and procedures, the provision of resources, and the continuous improvement of our business practices.

## no modern slavery

We take a zero-tolerance approach to modern slavery: no form of forced labor, such as slave, bonded, indentured, or prison labor, will be used or offered, nor do we engage in human trafficking. Randstad companies shall never - directly or indirectly - engage in recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit.

Work must be voluntary and placed workers and employees shall be free to leave work or terminate their employment with reasonable notice, provided they abide by local legal requirements. Randstad companies shall never charge directly or indirectly (e.g., through subcontractors) any fees or related expenses to job seekers, placed workers and employees for registration or recruitment, whether for a temporary assignment or a permanent position. Lodging

of deposits is never required, and no one shall be deprived of his or her identity papers, diplomas or training certificates upon starting or terminating work for Randstad or its clients.

## no child labor

We do not engage in child labor<sup>2</sup>, either directly or indirectly, and always adhere to the legal age requirements in all countries in which we operate.

## freedom of association

We respect the right of employees to establish or join a trade union or similar body and be represented by them. Employment will not be subject to the condition that a person may not join such a body or must terminate his or her membership.

In addition, Randstad actively promotes employee participation through a network of national works councils and through dialogue with trade union representatives.

We shall not make talent available to a client for the purpose of replacing any workers of that client company who are legally on strike.

## collective bargaining

Randstad has long been an advocate of enabling flexible workforce solutions while adequately protecting workers' rights in terms of remuneration, social security, and opportunities for growth and development.

Randstad strives to establish constructive dialogues and to bargain in good faith in its contacts with trade unions or legitimate and relevant representative organizations. We invest in social dialogue and conclude collective labor agreements where possible and relevant. This is closely linked to our core value of 'simultaneous promotion of all interests'. Either on our own account and/or through recognized industry bodies, we actively call for decent, clear, fair, and workable rules and regulations in the markets in which we operate.

## fair working hours

Working hours shall not exceed the maximum set by local law, applicable collective bargaining agreements and ILO standards. This includes ensuring that our employees and placed workers have adequate time off for rest and leisure.

## remuneration

Remuneration for employees and placed workers shall be consistent with the provisions of international standards and national labor legislation and regulations, including on non-discrimination. Where they exist, this includes national minimum wages and/or minimum wages as set up in collective labor agreements, and ILO standards. In all other cases, we take a general legal compliance approach.

## employability

Ongoing skills development is essential for employability and sustainability in any workforce. Our training programs are tailored to meet the needs of talent and clients in individual employment markets. We aim to be present at all stages in a person's career, consistently improving their employability and providing training opportunities where this is appropriate.

## respect for local communities

We are committed to being a good corporate citizen, and our companies are encouraged to contribute directly or indirectly to the general well-being of the communities in which we work, while at the same time minimizing disruptions. Randstad strives to recruit qualified local personnel

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<sup>2</sup> The term 'child labor' is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children, and interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work.

where this is commercially possible. We undertake community initiatives in line with our [Corporate Citizenship and Philanthropy Policy](#).

## 3.2 differences with local law

Where this policy, our procedures and external commitments are more stringent than local laws, we always operate in accordance with our more stringent standards. If stricter requirements apply under local laws, such stricter requirements will always prevail over those laid down in this policy. Where local law prohibits us from upholding certain aspects of this Human Rights Policy, we shall comply with these local laws while seeking to respect human rights. Any positive discrimination initiatives should be carefully checked to ensure compliance with applicable local legislation.

# 4. due diligence on human rights

Human rights are an integral part of our core values and business processes. They are always taken into account during our strategy-setting process, and are respected in our daily operations, as appropriate to our involvement, the nature and context of our operations, the extent to which human rights issues are likely to occur, and the impact they may have (severity and likelihood).

Our global Risk & Control framework (comprised of 'tone at the top', performance management, concepts and best practices, risk & control activities, and reviews & audits) ensures that Randstad follows human rights principles worldwide. The design of this framework balances behavioral, preventive, detective and monitoring measures that safeguard compliance with human rights.

Operating companies and global functions assess the components of the Risk & Control framework at least once every six months. In addition, internal audits are carried out to evaluate and complement these self-assessments. The results of all these assessments, including improvement plans, lead to a Group-wide in-control benchmark discussion in meetings of both the Executive Board and the Audit Committee.

We support our clients and suppliers in following human rights principles. We continuously discuss with our clients and suppliers any salient human rights issues. Based on criticality and applicable law, Randstad may inspect the clients' facilities to ensure compliance with relevant regulations, such as health and safety. In addition, we may audit the supplier, and in case of non-compliance, Randstad will discuss appropriate improvement plans. Continued non-compliance will result in termination of the contract.

# 5. grievance procedure

## 5.1 when in doubt or in the event of questions

Trust and simultaneous promotion of all interests are part of our core values. Anyone who has questions or is in doubt about whether a situation may be in conflict with this policy should reach out to us. Our employees can talk to their manager, a Human Resources representative, Randstad Legal, the local integrity officer or other local officers, such as an identified confidant. Our placed workers should reach out to their Randstad contact person or their manager or any other function as appointed locally (e.g., confidant). Jobseekers, clients and suppliers should reach out to their Randstad contact person.

Further guidance on how to contact Randstad can be found on [Randstad's local websites](#). You can also get in touch via [complianceofficer@randstad.com](mailto:complianceofficer@randstad.com).

## 5.2 how to report (suspected) violations

Any employee, candidate or other stakeholder who reasonably suspects or has witnessed a violation of this policy is expected to raise their concern in accordance with the Randstad Group Misconduct Reporting Procedure. Preferably, they do so as described in 5.1 above, directly to local management and through established operational channels. However, if for any reason this is likely to be ineffective or inappropriate, or if a complainant fears retaliation, use can be made of the Randstad Group Integrity Line.

The Integrity Line consists of a secure webpage and telephone hotline, available 24/7, and operated by an independent external provider. Reports can always be made in the local language. The Integrity Line allows for communication between the complainant and Randstad.

Reports received through this Integrity Line are forwarded to the relevant Local Integrity Officer, who ensures that any report is dealt with quickly, fairly and lawfully, locally. If the report is related to local management, it will be followed up by the Central Integrity Officer and the Business Risk & Audit Function. All concerns are treated in confidence, and with the complete assurance that there will be no retaliation against anyone filing a complaint in good faith. Although we encourage reporters to share their identity (as communication with the reporter greatly facilitates any investigation), reports can also be submitted anonymously when making use of the Integrity Line.

Where serious misconduct is proven, management will take prompt and appropriate corrective action.

See our [Misconduct Reporting Procedure](#) on [randstad.com](https://www.randstad.com) for all relevant details and further information.

# annex - relevant principles, guidelines, declarations and conventions

United Nations Global Compact: <https://www.unglobalcompact.org/what-is-gc/mission/principles>

ILO Convention 181 on private employment agencies:

[https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_INSTRUMENT\\_ID:312326](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:312326)

ILO Declaration on Fundamental Principles and Rights at Work:

<https://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm>

ILO eight fundamental Conventions:

1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
3. Forced Labour Convention, 1930 (No. 29)
4. Abolition of Forced Labour Convention, 1957 (No. 105)
5. Minimum Age Convention, 1973 (No. 138)
6. Worst Forms of Child Labour Convention, 1999 (No. 182)
7. Equal Remuneration Convention, 1951 (No. 100)
8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

<https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

United Nations Guiding Principles on Business & Human Rights:

[https://www.ohchr.org/documents/publications/GuidingprinciplesBusinesshr\\_eN.pdf](https://www.ohchr.org/documents/publications/GuidingprinciplesBusinesshr_eN.pdf)

United Nations Human Rights, Protocol to Prevent, Suppress and Punish Trafficking in Person:

<https://www.ohchr.org/en/professionalinterest/pages/protocoltraffickinginpersons.aspx>

Employment & Recruitment Agencies Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights

[https://www.ihrb.org/pdf/eu-sector-guidance/EC-Guides/E&RA/EC-Guide\\_E&RA.pdf](https://www.ihrb.org/pdf/eu-sector-guidance/EC-Guides/E&RA/EC-Guide_E&RA.pdf)

World Employment Confederation Code of Conduct

[https://www.wecglobal.org/fileadmin/templates/ciETT/docs/Corporate\\_literature/Code\\_of\\_Conduct\\_-\\_WEC\\_2017.pdf](https://www.wecglobal.org/fileadmin/templates/ciETT/docs/Corporate_literature/Code_of_Conduct_-_WEC_2017.pdf)

WEC Corporate Members & UNI Global Union Memorandum of Understanding:

[https://www.wecglobal.org/index.php?id=110&tx\\_ttnews%5BpS%5D=1225494000&tx\\_ttnews%5BpL%5D=2591999&tx\\_ttnews%5Barc%5D=1&tx\\_ttnews%5Btt\\_news%5D=62&tx\\_ttnews%5BbackPid%5D=108&cHash=be5870d1a474a34e14d72f8c951be9c6](https://www.wecglobal.org/index.php?id=110&tx_ttnews%5BpS%5D=1225494000&tx_ttnews%5BpL%5D=2591999&tx_ttnews%5Barc%5D=1&tx_ttnews%5Btt_news%5D=62&tx_ttnews%5BbackPid%5D=108&cHash=be5870d1a474a34e14d72f8c951be9c6)

