

randstad group procedure

# misconduct reporting procedure.



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This Randstad Group Policy is the local translation of Randstad Global's Misconduct Reporting Procedure 2019.

## 1. objective

As an international organisation with a global focus on excellence, Randstad Group expects all of its companies and employees, including all directors and representatives, to conduct themselves in accordance with our core values and Business Principles at all times. This means that we act responsibly, with integrity, and in accordance with Randstad policies and procedures, as well as applicable laws. We expect our employees to help Randstad maintain its excellent reputation by respecting 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 responsibility and encourages all stakeholders to report any incidents where conduct is inconsistent with our core values and/or Business Principles. Such reports must be made in accordance with this Misconduct Reporting Procedure.

## 2. our procedure

### 2.1 introduction

To help you report (suspected) misconduct within Randstad Group, we have specific channels through which you can raise your concerns. These are either local reporting procedures, established at company level, or our **Integrity Line**. The Integrity Line is Randstad Group's reporting facility (see section 2.3 below) for reporting serious misconduct.

All reports made in accordance with our official procedures will be handled confidentially (except when disclosure is necessary to conduct an effective investigation - including the accused's right of reply - or to take appropriate action) and with the absolute assurance that there will be no retaliation against any employee making a report in good faith.

The **Integrity Line** can be used to report incidents if you reasonably suspect or have evidence of serious misconduct within or related to Randstad.

This includes, but is not limited to, serious matters such as:

- violations of basic human rights principles
- safety and health deficiencies
- violations of Randstad's Business Principles
- violations of Randstad's policies or procedures (e.g. anti-competitive practices, discrimination, harassment, bribery, fraud)
- criminal offences
- non-compliance with legal obligations (including incorrect financial and accounting practices)
- personal misconduct or disrespect

Randstad N.V.'s Executive Board has overall responsibility for the Misconduct Reporting Procedure and its application. The management of each Randstad Group company is obliged to ensure that this Misconduct Reporting Procedure is implemented within their organisation.

## 2.2 definitions

**Randstad Group** refers to Randstad N.V. and/or one of its subsidiaries

The **Complainant** is a person, from within or outside Randstad Group, who in good faith and with reasonable suspicion and/or evidence of possible misconduct makes a report (also called a complaint or concern) concerning misconduct or wrongdoing within or in relation to the Randstad Group.

**Business Principles:** see <https://www.randstad.be/en/about-randstad/business-principles/>

The **Integrity Line** is the reporting facility consisting of a telephone hotline, accessible 24 hours a day via a local toll-free number, and a secure webpage, both managed by an external provider.

The **Local Integrity Officer** is the person or position that ensures that all cases reported to the **Integrity Line** are investigated and handled in a lawful and timely manner, with full respect for the rights of all individuals involved. Each country/local Randstad Group company (including Randstad N.V.) has its own Local Integrity Officer. The Local Integrity Officer may be a Randstad employee or an external party, as deemed appropriate by the relevant managing director and the Central Integrity Officer.

The **Central Integrity Officer** is the person appointed by Randstad N.V.'s Executive Board to coordinate integrity issues pursuant to this Procedure and to provide periodic reports to the Executive Board, as well as an annual report to the Audit Committee of the Supervisory Board, on matters reported through the **Integrity Line** or directly to the Central Integrity Officer. The Central Integrity Officer also ensures that reports under this procedure of suspected misconduct of one or more members of the management team of a local Randstad Group company are assessed centrally.

## 2.3 reporting

Anyone who reasonably suspects or has observed misconduct is obliged to report this to . Stakeholders are encouraged to first raise their concerns through the normal (local) reporting channels, i.e. the local management line or other regular local contacts, such as HR or Legal or through the complaint form on the website. Reporting to management is usually the quickest and most appropriate way to ensure a good and open working environment throughout Randstad Group.

The **Integrity Line** should not be used to circumvent normal reporting procedures. It is intended only for situations where reporting through the normal reporting channels is likely to be inappropriate or ineffective, and should be considered only as a last resort.

Reports via the **Integrity Line** can be made in Dutch, French or English. The **Integrity Line** consists of a telephone hotline, accessible 24 hours a day via a toll-free local access number, and a secure webpage. Both are managed by an independent external provider. See Appendix 2 for full contact details and user instructions. Although reports can also be made anonymously, Randstad encourages Complainants to reveal their identity when making a report, as this simplifies the investigation of the report considerably.

To minimise unreliable and false reports, and for reasons of privacy protection, Randstad will only investigate anonymous reports received through the **Integrity Line**.

## 2.4 handing of a report

Reports received through the **Integrity Line** are forwarded to the Local Integrity Officer for the company concerned. A copy of the report is also sent to the Central Integrity Officer.

The Local Integrity Officer will provide a Complainant with confirmation of receipt of the report via the **Integrity Line** within five working days. To the extent appropriate and practicable, the Complainant will be kept informed of the progress of the investigation. However, for reasons of confidentiality and privacy, we may not be able to share specific details of the investigation or the actions taken.

If a report is made through the **Integrity Line**, but should have been made through the normal (local) reporting procedures (e.g. payroll or general issues or service satisfaction issues), the Local Integrity Officer will refer the Complainant to the applicable (local) reporting procedures or contact the relevant local function to handle the report.

The Local Integrity Officer ensures that all matters that may be reported through the [Integrity Line](#) are investigated and handled in a lawful and timely manner, with full respect for the rights of all individuals involved. In certain cases, such matters may be referred to and handled by a representative of local management and/or other relevant company functions, depending on the nature of the report. The same practices of confidentiality and non-retaliation still apply in these cases.

The Local Integrity Officer may decide not to investigate a report if:

- there is insufficient information for a fair investigation and it is not possible to obtain further information;
- there are indications that the report was made in bad faith.

If the reported misconduct involves one or more members of the management team of a Randstad Group company, the Local Integrity Officer will forward the report to the Central Integrity Officer. The Central Integrity Officer may inform the local management and will inform the responsible member of Randstad N.V.'s Executive Board and/or the Audit Committee of the Supervisory Board.

Reports concerning one or more members of Randstad N.V.'s Executive Board or Supervisory Board shall be dealt with by Randstad N.V.'s Local Integrity Officer, who is a member of the Audit Committee.

Following the investigation, timely and appropriate corrective action shall be taken as and when the relevant level of management deems it to be necessary, taking into account the relevant business functions (e.g. HR, Legal).

Randstad expects its management on all levels within Randstad Group to handle all reports of alleged misconduct in a serious, confidential and expeditious manner and to ensure that the Complainant does not face retaliation. The management is obliged to cooperate fully with any investigation of alleged misconduct.

## 2.5 reporting in good or bad faith

Anyone who raises a concern in good faith will not be disadvantaged as a result. If no violation is found after an investigation, no action will be taken against the Complainant, unless the concern was raised in bad faith. Reports shall be deemed to have been made in bad faith if the Complainant knows that the report is materially untrue, and that this procedure is being misused (a) for personal grievance, (b) for personal gain, or (c) to intentionally harm Randstad Group or any of its employees, including managers and directors. Randstad Group considers a report made in bad faith to be a very serious offence.

Any report made in bad faith by an employee is considered a serious violation of the Business Principles. Randstad Group may take further action, if appropriate, against a Complainant who knowingly makes a false allegation or acts with malicious intent. Further measures may include disciplinary action, which could lead to termination of employment.

## 2.6 protection from retaliation, rights and obligations of the Complainant

The identity of all Complainants will be kept confidential to the extent practicable and retaliation against Complainants acting in good faith will not be tolerated. More specifically, Randstad Group shall not dismiss, demote, suspend, threaten, intimidate or in any way discriminate against an employee on the basis of a report made in good faith and lawful actions with respect to reporting misconduct. Any perceived retaliation should be immediately reported to the Central Integrity Officer.

Making a report does not automatically protect Complainants who themselves participated in the reported misconduct from disciplinary or other measures relating to their participation in the misconduct. Randstad Group shall, however, take into account the fact that the Complainant made the report as a mitigating factor.

If a Complainant reports suspected or actual misconduct, the Complainant shall continue to comply with any contractual or other confidentiality obligations towards Randstad Group. The Complainant should therefore avoid any form of external or internal publicity and use internal procedures first, unless external reporting is required or otherwise authorised by applicable law. Randstad retains its rights with regard to a breach of such contractual or other confidentiality obligations.

If a Complainant decides to report alleged misconduct externally while an investigation by a Randstad Group Company is underway, the Company may decide to discontinue involving the Complainant in that investigation or to stop the investigation and take other steps it deems necessary.

## 2.7 protection and rights of the person under investigation

If a person is the subject of an investigation as a result of a report made through this procedure, they will normally be informed of the fact within a reasonable time, depending on the facts and circumstances and whether there is an alleged risk of destruction of evidence, retaliation and/or obstruction of the investigation.

Any person who is the subject of an investigation has the right to respond to the allegations and appeal against any findings or decisions adverse to him.

## 2.8 data protection, privacy & confidentiality

All personal data obtained as part of a notification and investigation under this Procedure (from the Complainant, any person under investigation and any witnesses) shall 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 on the [Integrity Line](#) shall be deleted by the Local Integrity Officer three months after a case is closed, unless a longer retention period is required due to the nature of the allegations and/or investigation

Personal data shall only be shared with those who have a need to know and are bound, as far as possible and in accordance with the need to conduct an investigation, by a duty of confidentiality, and who will, if necessary, take appropriate action. Exceptions are possible if Randstad has a legal or regulatory obligation to disclose the information or if the notification was made in bad faith.

## 2.9 amendments

Randstad N.V.'s Executive Board may amend this policy at any time, after consultation with the Audit Committee, in a manner consistent with the requirements of applicable laws and regulations and shall, to the extent appropriate, involve Randstad's European Works Council and the relevant works councils.

Diemen, Netherlands  
January 2019

# annex 1 - summary

randstad group

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### are you concerned about misconduct?

Some examples:

- Is this a health & safety issue?
- I feel discriminated or harassed.
- Is this fraud?
- I suspect a breach of competition law.
- I think this gift is way too expensive.
- This is misuse of company assets!
- Is this a breach of human rights?
- I suspect bribes are being paid.

### who can you talk to?

- If possible, talk to the person involved.
- Talk to your HR manager, HR business partner, confidant, risk & audit manager, privacy officer<sup>1</sup> or legal counsel<sup>2</sup>
- You may also contact your local integrity officer via the local website.

1. fraud reporting
2. data breach, abuse of personal data and other privacy related matters
3. always for competition and bribery issues or questions

### if these options seem inappropriate or ineffective you may also:

- Send an email to the central integrity officer at: [complianceofficer@randstad.com](mailto:complianceofficer@randstad.com) or
- Submit a report or question through the Randstad Group Integrity Line<sup>3</sup> (SpeakUp, managed by People Intouch, an independent external provider). On [randstad.com](http://randstad.com) you can find further details, including local free phone number, webaccess and access codes per country.

We realize it is not always easy to raise concerns about possible misconduct, but we do encourage you to share your concerns with Randstad. Your concerns will be dealt with carefully and confidentially (to the extent possible). No retaliation against good faith complainants will be tolerated.

For the full procedure see: [randstad.com](http://randstad.com)

<sup>4</sup> We encourage you to reveal your identity when reporting, as this greatly facilitates the investigation. However, if you want to report anonymously, you should do so by making use of the Randstad Group reporting facility.



# annex 2 - user instructions & contact details

## *Integrity Line* user instructions

### Toll-free number

- The Complainant calls the applicable toll-free number; the call is answered by a voice computer. After the Complainant has made the notification, he/she receives a unique case number. The report can be made in Dutch, French or English. The external provider then sends a verbatim copy of the voice recording to the Local Integrity Officer of the country/company concerned.
- To protect the caller's anonymity, the voice recording remains with the external provider and is destroyed once the Local Integrity Officer has acknowledged receipt of the transcript.
- Using the unique case number, the Local Integrity Officer can leave a reply for the Complainant to acknowledge receipt of the report and, if necessary, ask verification questions or summarise a conclusion. After the first report, the Local Integrity Officer will try to post a reply within five working days at the latest.
- The Complainant can call again, using the case number, and hear the Local Integrity Officer's response. The Complainant may choose to answer questions immediately or at a later time.

### Online reporting form

- The Complainant goes to the relevant web page, leaves a message by entering a text (in Dutch, French or English) and receives a unique case number. The external provider translates the message (if it is not in English) and sends the translation plus a copy of the online message to the Local Integrity Officer of the country/company concerned.
- Using the unique case number, the Local Integrity Officer can leave a reply for the Complainant to acknowledge receipt of the report and, if necessary, ask verification questions or summarise a conclusion. After the first report, the Local Integrity Officer will try to post a reply within five working days at the latest.
- The Complainant can use the case number to log in again and can then see the Local Integrity Officer's response. The Complainant may choose to answer questions immediately or at a later time.

## contact details

Country	Toll-free number and URL	Access code	Language choices
Belgium	0800-71365 <a href="http://www.speakupfeedback.eu/web/integrityatrandstad/be">www.speakupfeedback.eu/web/integrityatrandstad/be</a>	42101	EN / FR / EN
Randstad Group's Central Integrity Officer can only be reached online at <a href="http://www.speakupfeedback.eu/web/integrityatrandstad/nl">www.speakupfeedback.eu/web/integrityatrandstad/nl</a>		55984	EN / EN

