



THE ADECCO GROUP

Public Affairs

Guidelines

Scope and Purpose

The Adecco Group aims to make the future work for everyone. In order to do so effectively, efficiently and sustainably for the benefit of all stakeholders, we notably depend on Governments creating the enabling environment, setting balanced policy and ensuring well-structured and functioning labour markets. Due to the complexity of the challenges the world faces today, Governments seek the expertise and support of labour market participants and experts such as the Adecco Group.

Public Affairs activities are aimed at policy making processes relevant to the Group's business success. They include interactions with and towards public policy and public sector stakeholders, such as Government bodies and elected officials, as well as with other stakeholders such as social partners, think tanks and academics, and (social) media activities. We believe it is important to engage with a broad range of external stakeholders to ensure diverse perspectives are considered.

This is the task of those responsible for Public Affairs across our organization. They establish and maintain links to stakeholders in politics and society with the Group's Objective in mind, i.e. to be the world's leading talent advisory and solutions company, by providing access to work, improving employability and building a better world of work.

This document defines the Guidelines for Public Affairs¹, which in conjunction with the Group Public Affairs Principles complement the Group Code of Conduct as well as select Group Policies such as the Bribery and Corruption Prevention (ABC) Policy, the Competition (Antitrust) Policy, and the Conflicts of Interest Policy. The Adecco Group has an integrated approach to managing our political activities in accordance with our company wide integrity and compliance principles and procedures. The Adecco Group fully respects and follows the national laws of each of the jurisdictions in which the company operates.

The Guidelines reflect the status of November 2020.

¹ On terminology: "**Public Affairs**" refers to the activity carried out by Public Affairs representatives, engaging with external and internal stakeholders. "**Public Affairs representatives**" refers to the colleagues who either carry the bespoke Public Affairs Job title and / or are known to the organisation as acting in the remit of Public Affairs activities. Dedicated Public Affairs colleagues are referenced in these Guidelines as "**Public Affairs Leads**" to mark the difference to broad Public Affairs representatives. "**Group Public Affairs**" refers to the Function at Group headquarter in charge of Public Affairs.

Role

Public Affairs representatives introduce the Group's position into political decision-making and consultation processes by providing truthful and comprehensive information as well as reliable and competent advice. They can also contribute ideas for innovative strategies or for future-oriented regulatory approaches.

The Adecco Group is transparent about the positions it advocates for. Information about the Group's key positions is published regularly via the Group's website and other relevant reporting mechanisms.

In dialogue with politicians and other stakeholders, Public Affairs representatives contribute to sharpening and raising the Group's profile as a responsible company and increasing its ability to deliver value. The goal is to maintain constructive and cooperation-oriented relations with all stakeholders.

Within the Group, Public Affairs representatives foster an understanding of political processes and a culture of open dialogue with political stakeholders. Representatives examine and collect information, analyse its relevance and identify gaps and propose best course of action in collaboration with internal stakeholders, and draft differentiated analyses and positions for the company. At Group level, a globally coordinated approach and aligned communication of the brands and solutions is fostered by the Group Public Affairs Function.

Governance

As per the Charter of the Governance and Nomination Committee of Adecco Group AG, the Board of Director's Governance and Nomination committee (GNC) *oversees the Public Affairs Principles and all related initiatives and shall periodically review the Public Affairs Principles.* (Art. 3.4.2). As per the Charter of the Audit Committee, the Board of Director's Audit Committee shall *oversee the Group's compliance with laws and regulations, internal principles, guidelines and policies (such as the Code of Conduct, the corporate governance, the corporate responsibility and the public affairs principles)* (Art. 3.4).

The global responsibility for engagement with policy makers lies with the dedicated Group Public Affairs (GPA) Function. The GPA Function carries out any necessary company-wide coordination and holds the corresponding reporting responsibilities. The Head of the GPA Function reports to the Group CEO and updates the Board's Committee appropriately.

In addition to GPA Function, public affairs is represented on Group level and at the company's locations across select geographies and brands. Per se, Group colleagues acting as Public Affairs

representatives or Country and Brand Heads can fulfil tasks and roles in dialogue with politics and related stakeholders².

Country and brand Public Affairs representatives are appointed by the Country or Brand Heads, in cooperation with the Head of the GPA Function. Ideally, Public Affairs representatives bring Public Affairs skills-sets and experience to the role. Public Affairs Leads must have had experience in public affairs activities and dedicate themselves exclusively to public affairs.

Across the geographies and the brands, the respective Public Affairs Leads have a dotted reporting line to the Head Group Public Affairs. At country level, Public Affairs Leads have a solid reporting line to the Country Head. At brand level, Public Affairs leads have a solid reporting line to the Brand Lead.

Public Affairs representatives are responsible for the agenda, priority and objectives-setting as well as the execution of public affairs activities at the country / brand level. The Public Affairs representatives are part of the Public Affairs Expert Group run by the GPA Function representatives and report relevant developments to GPA Function representatives.

Network

Both the Group and its brands hold memberships in various trade and industry associations, at global and local levels. These groups play an important role in representing our industry in the public debate, as they advocate for public policies that support innovation and that will benefit workers, businesses (including ours) and society as a whole. Public Affairs representatives are therefore explicitly encouraged to actively participate and engage with them. They commit to introducing the positions of the Group developed for dialogue with political decision makers unchanged within these organisations, whilst respecting applicable competition and antitrust laws³. The Group Public Affairs Principles and Guidelines are equally binding on them within the context of these engagements.

Members of such organisations must typically accept their respective policies and rules. When a membership is taken up, these policies and rules must therefore previously be reviewed for any contradictions to applicable regulations of the Group.

² TAG CoC, p.9: *We ensure that only authorized colleagues provide information or speak publicly on The Adecco Group's behalf to public and government officials.*

³ TAG Competition (Antitrust) Policy, 4.2: Because trade associations provide an opportunity for competitors to meet, they are likely to be subject to close scrutiny by competition authorities. However, since trade associations are, by their nature, meetings of competitors, those attending must be particularly cautious about being drawn into any discussion which might lead to improper conduct. If, at a trade association meeting, any matter that would violate this Policy is raised, employees must: a. immediately object; b. ask the Chairman to record that they are leaving the meeting and why; c. leave the meeting; and d. make sure they report their experience in writing to the TAG Group Legal Department.

TAG Competition (Antitrust) Policy, 5.1: Information exchanges between competitors can take various forms, as data may be shared directly, or may be collected and/or processed by a third party such as a trade association or a consultancy firm or even clients.

Information about key memberships in trade and industry associations is published yearly in the Annual Report.

Principles

The Adecco Group is committed to participating in a **constructive, transparent, integrous and responsible** dialogue with policy makers and other labour market stakeholders by providing **relevant, coherent, conclusive and honest** information in order to highlight and address the issues that affect the broad world of work and the private employment services industry in particular and advance its regulatory framework.

For further details please consult the Group Public Affairs Principles and the Adecco Group Code of Conduct⁴.

Further Provisions

- **Contact with political decision makers**

All contacts with political decision makers must strictly comply with Adecco's Code of Conduct and its policies, with all applicable laws and regulations as well as with the Codes of Conduct applicable to such political decision makers, notably any measures to prevent bribery and corruption, and competition and antitrust Law.

When dealing with public and elected officials, Public Affairs representatives pay particular attention to the Group Public Affairs Principles, ie honesty and integrity, transparency and openness, respect, independence and prohibition of any abuse, and confidentiality.

Public Affairs representatives act in a politically neutral manner but are not indifferent. As a general rule, they represent the Group's positions in dialogue with political decision makers around the world but reserve the right to refuse contact with individual stakeholders on the basis of the Adecco Group Code of Conduct.

The Group and its brand are not to be used as platforms by anyone, ie. those holding or campaigning for political office to further their own agendas.

The Public Affairs representatives strictly abide by the Adecco Group Bribery and Corruption Prevention Policy, thereby acknowledging their increased responsibility and duty of care associated with their duties as Public Affairs representative.

⁴ TAG CoC p.8: *When we are in contact with regulatory officials, we conduct ourselves in a transparent and professional manner.*
TAG CoC, p.9: *We communicate in an honest, accurate, timely and effective manner, complying with all relevant legal requirements.*

The Adecco Group rejects any form of bribery, corruption or undue advantage. Facilitation payments are prohibited. Conduct that could create the mere appearance of improper influence is prohibited⁵.

- **Public Affairs platforms**

Public Affairs representatives engage in dialogue with political actors in various exchange channels and platforms. Information on the platforms is available publicly.

- **Disclosure of lobbying expenses**

Wherever required and/or available, Public Affairs representatives sign up in registers of public institutions and disclose relevant aggregate costs of lobbying, including personnel costs and consulting costs.

- **Sponsoring, donations or political contributions**

Any sponsoring or any kind of political contributions, i.e. donations to political parties, political campaigns or political action committees⁶ must be in line with the provisions of the Group Bribery and Corruption Prevention Policy⁷.

⁵ TAG Bribery and Corruption Prevention Policy, 4:

¹ No employee may offer, promise or give a bribe, whether directly or indirectly, to a Government Official or to a private party to induce that person to take any action or make any decision that will give the company an improper business advantage.

² No Employee may request or agree to receive a bribe, whether directly or indirectly, in order to allow a current or proposed Agent or Supplier to retain or obtain a commercial business relationship with the company, or to gain an improper advantage in the conduct of business with the company.

³ This policy expressly prohibits Facilitation Payments, regardless of their size and how often they are paid, made directly or indirectly to a Government Official on the company's behalf.

⁴ The Adecco Group further requires that Employees...always follow the company's internal policies and procedures relating to the prevention and detection of bribery and corruption, especially in the areas of business gifts and hospitality, charitable contributions, and political donations;

Note: Bribery can take many forms, both directly or indirectly through third parties (therefore is required to have designated clauses in the contract with the supplier, vendor, etc. and also monitor their activity throughout the relationship).

⁶ TAG Bribery and Corruption Prevention Policy, 2.9: A "political contribution" means a gift, loan, advance or deposit of money or anything of value by and on behalf of the Adecco Group to a candidate for public office, a political party or organization, or a ballot initiative.

⁷ Art. 7 of the said Policy: 1 Charitable Contributions and Political Contributions have to be documented in writing and may only be made against written receipt. They must not be offered or made without the prior approval of the relevant Country Manager, Global Business Head or equivalent person. 4 All proposed Political Contributions must be aligned with the interests of the Adecco Group, including the protection of the company's public reputation. 5 No Political Contributions are permitted in order to secure political or commercial influence on behalf of Adecco.

- **Gifts and entertainment**

The Adecco Group representatives never try to influence public officials by inducements such as generous gifts or entertainment⁸.

- **Political activities by TAG employees**

Employees of the Adecco Group and any of its subsidiaries must not use company time or resources to enable private political activity. Equally, the Adecco Group and its subsidiaries must not interfere in any way in private political activities of its employees that are permitted by law. Political activities by employees outside work are encouraged but should be disclosed to in line with the Group's Conflict of Interest Policy; they will not be sponsored, directly or indirectly, by the Adecco Group and its subsidiaries⁹.

- **Working with Public Affairs agencies**

The Adecco Group may partner with specialised agencies for the purpose of supporting the Group public affairs activities.

The Group expects and requires that any association, contractor or agency working for or on behalf of The Adecco Group, including Public Affairs agencies, Public Relations agencies and lobbyists, must fully abide by the provisions contained in the Adecco Group Public Affairs Guidelines and Principles when engaging with Government Officials¹⁰.

The conditions of engagement with Group with Public Affairs agencies are described in a separate Policy annexed to these Public Affairs Guidelines.

⁸ TAG CoC p.8 and Bribery and Corruption Prevention Policy Art. 5, which names conditions for making gifts and entertainment, one of them being that "*it cannot reasonably be construed as an attempt to improperly influence the performance of the role or function of the recipient*".

⁹ TAG CoC, p.9. The Adecco Group encourages its colleagues to participate in services to the community and political activities within the local legal framework. However, we do not engage in any political activity on The Adecco Group's behalf unless authorized to do so.

¹⁰ Note based on TAG Bribery and Corruption Prevention Policy: In the methodology re due diligence for agents/suppliers, there is an explicit reference to "Lobbying, political campaigning" as one of the services that require local TAG personnel to undertake 'Supplier Due Diligence (SDD)'. This SDD consists of (a) a checklist to be completed and signed by local TAG Personnel and (b) a questionnaire to be completed and signed by the Agent/Supplier. This is to be applied to both existing and new agent/suppliers. Also: Bribery can take many forms, both directly or indirectly through third parties (therefore is required to have designated clauses in the contract with the supplier, vendor, etc. and also monitor their activity throughout the relationship).

Group Public Affairs Guidelines and Principles Checklist*

When carrying out Public Affairs activities, Public Affairs representatives shall:

- identify themselves by name and by stating their affiliation to the Group or a brand;
- declare the interest represented;
- neither intentionally misrepresent their status nor the nature of their inquiries nor create any false impression in relation thereto;
- neither directly nor indirectly misrepresent links with the stakeholder in scope;
- honour confidential information given to them;
- not disseminate false or misleading information knowingly or recklessly and exercise proper care to avoid doing so inadvertently;
- not sell for profit to third parties copies of documents obtained from the stakeholder in scope;
- not obtain information by dishonest means;
- avoid any professional conflicts of interest;
- neither directly nor indirectly offer or give any financial inducement to any elected or appointed public official, or staff of their institutions and political groups;
- neither propose nor undertake any action which would constitute an improper influence on them;
- only employ former Political Stakeholders according to the rules and confidentiality requirements of the respective institutions;
- disclose channels used for lobbying purposes (e.g. company staff engaged in lobbying memberships in relevant business associations, registration at lobby registers).

* Key source: European Public Affairs Consultancies' Association Code of Conduct