



# Code of Conduct

October 2025



# Table of Contents

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## Being a Good Employer and Employee

---

Right Working Conditions

Tone at the Top

Human Rights

Inclusion & Belonging

Non-discrimination & Anti-harassment

Health, Safety & Wellbeing

---

---

## Ethical Business Practices

---

Privacy & Data Protection

Interaction & Engagement with Others

Fair Competition

Conflict of Interest

Bribery, Gifts & Improper Advantages

Anti-fraud

Money Laundering / Insider Training / Financial Integrity

Contacts with Illegal Persons & Organizations

Sanctions

Communication with the Public

Use of Artificial Intelligence

---

---

## Responsibility Towards Society

---

Social Responsibility

Our Commitments & Behaviors

---

---

## Grievance & Misconduct Reporting

---

Grievance & Misconduct Reporting

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## Right Working Conditions

RGF Staffing is committed to ensuring safe, respectful, and fair working conditions for all employees. We prioritize a healthy work environment that fosters well-being, productivity, and equal opportunities, regardless of whether employees are working from home, in the office, or travelling for work. Our commitment is rooted in respect for each individual's rights and contributions, promoting fairness, respect, and opportunity for all. Together, we can create a workplace where everyone feels valued, respected, and empowered to succeed.

## Tone at the Top

RGF Staffing's leadership plays a pivotal role in setting and exemplifying the ethical tone and values that guide our company. Our leaders are committed to the highest standards of integrity and actively communicate and endorse these standards through their actions and words. This commitment forms the bedrock of our organizational culture and paves the way for our collective success. We believe that a strong ethical foundation is essential to our success and the trust of our stakeholders. Our leadership champions these values and sets the tone for ethical behavior across the organization. Together, we ensure that our workplace remains a positive, ethical, and supportive environment for all.





## Human Rights

Our company is committed to upholding and respecting human rights and labor rights in all aspects of our operations. We recognize that every individual is entitled to fundamental rights and freedoms, and we strive to create an environment where these rights are protected and promoted. Our dedication to these principles is integral to fostering a safe, fair, and inclusive workplace for all employees, stakeholders, and partners. We believe that respecting human rights and labor rights is essential to our success and the trust of our stakeholders.

Our leadership champions these values and sets the tone for ethical behavior across the organization. Together, we ensure that our workplace remains a positive, ethical, and supportive environment for all.

**Related policy:** [Recruit Group Human Rights Policy](#)

## Inclusion & Belonging: Opportunities for All

RGF Staffing's leadership plays a pivotal role in setting and exemplifying the ethical tone and values that guide our company. Our leaders are committed to the highest standards of integrity and actively communicate and endorse these standards through their actions and words. This commitment forms the bedrock of our organizational culture and paves the way for our collective success. We believe that a strong ethical foundation is essential to our success and the trust of our stakeholders. Our leadership champions these values and sets the tone for ethical behavior across the organization. Together, we ensure that our workplace remains a positive, ethical, and supportive environment for all.



## Non-discrimination & Anti-harassment

At RGF Staffing, we have zero tolerance for harassment, discrimination, and human rights violations. We are committed to treating all People fairly and with respect, fostering a culture of mutual trust, and valuing differences of opinion and cultural diversity. We expect our employees, suppliers, and customers to promote a harassment and discrimination-free workplace, ensuring that everyone is treated with dignity and protected from any form of harassment or discrimination based on race, ethnic or national origin, religion, age, gender, sexual orientation, marital status, disability, or type of employment.

Discrimination can take many forms and can be direct or indirect. It includes making decisions or acting on the basis of personal characteristics such as race, ethnic or national origin, religion, age, gender, sexual orientation, marital status, disability, or type of employment (limited/unlimited, temporary/fixed). We prohibit any form of discrimination and are committed to providing a workplace where People from every background feel welcome and respected.

We prohibit any kind of harassment, whether verbal, written, psychological, or physical. Harassing conduct includes negative stereotyping, threatening, intimidating or hostile acts, inappropriate touching, unwelcome sexual advances, denigrating jokes, and written or graphic material that degrades or shows hostility or aversion toward an individual or group. We promote a safe and healthy environment where People can work comfortably and feel safe.





## Health, Safety & Wellbeing

At RGF Staffing, we are committed to creating a healthy and safe working environment for all stakeholders, including employees, contractors, clients, and visitors. We consider healthy and safe work a fundamental right for everyone. Although legal requirements regarding safety and health differ by country, unsafe work is never an option. Our companies continuously assess health and safety risks, taking appropriate measures to limit these risks based on legal responsibilities and business practices.

Our objectives include aiming for zero fatalities and a continuous decline in physical or mental harm. We minimize risks by assessing, identifying, and controlling safety, health, and wellbeing hazards, considering foreseeability and practicality. We promote health and safety measures at every level of our business and actively coordinate with customers to ensure a healthy and safe working environment. We provide information and training to prevent harm and foster good working relationships.

We are dedicated to doing everything possible to create a safe and healthy workplace. However, we recognize that no environment is entirely risk-free. Therefore, we all have a responsibility to act safely, encourage others to do so, and comply with safety and health rules, regulations, and guidelines. By working together, we can maintain a safe and healthy environment for everyone.



## Privacy & Data Protection

At RGF Staffing, we are committed to protecting the privacy of our employees, customers, suppliers, and other stakeholders. We ensure that personal data is collected and processed fairly, lawfully, and transparently, and used only for legitimate business purposes. We take all necessary measures to ensure the accuracy, security, and confidentiality of the personal data we keep, and we do not retain personal data longer than required.

Confidential business information is of great importance to our company. We have a duty to protect the confidentiality of such information, whether it pertains to personal data, management information, or business information. Any disclosure of company or personal information must be carefully assessed and treated within our policies and procedures.

We prohibit the sale or provision of Personally Identifiable Information (PII) to any third party without formal approval from the RGF Staffing Executive Management Team. We ensure that any transfer of personal data to third parties is legitimate and that these parties guarantee the same privacy principles and level of protection as we do.

Our commitment to privacy and data protection is guided by applicable privacy laws and personal rights. We expect our People to treat all personal data in a safe, appropriate and lawful manner, respecting the privacy rights and interests of each individual. By upholding these standards, we ensure that our use of data respects the privacy rights and interests of each individual and maintains the integrity and trust of our stakeholders.

**Related policy:** [RGF Staffing Privacy Policy](#)





## Interaction & Engagement with Fellow Employees, Colleagues, Vendors, Contractors & Other Stakeholders

Our enterprise code of conduct extends beyond our immediate employees to encompass all stakeholders in our business ecosystem. We expect all employees, vendors, contractors, and other stakeholders to uphold the highest standards of professionalism and ethical behavior. Treat everyone with respect, dignity, and fairness, regardless of their role or affiliation with our organization. Foster an inclusive environment that values diversity and promotes collaboration across all levels and partnerships. Communicate transparently and honestly while respecting confidentiality agreements. Refrain from any form of discrimination, harassment, or unethical practices. Be a proactive team player, offering support and expertise to colleagues and partners alike. Demonstrate reliability, punctuality, and commitment to your responsibilities no matter your role or position.

Avoid conflicts of interest and maintain the integrity of our business relationships. If you observe any misconduct or ethical breaches, report them promptly through the appropriate channels. Remember, every individual associated with organization plays a crucial role in shaping our corporate culture and reputation of the local company represented, RGF Staffing B.V. and Recruit Group. By adhering to these principles, we collectively contribute to a positive, productive, and ethical work environment that benefits all stakeholders.

**Related policy:** RGF Staffing Supplier Code of Conduct (contracted suppliers receive this Supplier Code of Conduct)





## Fair Competition

At RGF Staffing, we are committed to respecting people, stakeholders, and society in all places and markets we operate. One of our key values is 'fairness,' which means conducting business fairly and complying with competition laws. These laws protect and promote fair competition, ensuring business efficiency, encouraging innovation, and guaranteeing the best choice and price for customers. Fair competition benefits both the public and our company.

Compliance with competition laws is essential for our success and reputation. All employees must be aware of and adhere to relevant local competition laws. Our Code clarifies the basic principles of competition laws and helps identify acts that may raise concerns. If you have any concerns, please contact your Legal Counsel for guidance.

We prohibit any agreements, understandings, or arrangements with competitors that affect competition, including informal understandings and coordination based on the exchange of commercially sensitive information. Meetings with competitors should only discuss non-price or non-market sensitive issues, and agendas and minutes should be documented.

Violation of competition laws can cause significant damage to our company, including penalties, third-party claims, reputational damage, and potential criminal liability.

By upholding these standards, we ensure that our business practices remain ethical, transparent, and compliant with competition laws.



## Conflict of Interest

At RGF Staffing, we are committed to acting in the best interest of the company in a reliable and professional manner. Our People avoid situations where a conflict could arise between the interests of our companies and a potential personal benefit or benefit of acquaintances. This policy provides guidance on identifying and managing conflicts of interest to protect the integrity of our decision-making process and uphold our reputation.

A conflict of interest occurs when personal benefits are chosen over the best interests of our companies, causing a struggle between diverging interests. It includes situations where the direct or indirect interests of our companies conflict with the direct or indirect personal interests of the person acting on behalf of our companies. This can involve financial and non-financial benefits, and the interests of the person involved may extend to family members, friends, or acquaintances.

We strive to avoid any conflict of interest and the perception thereof. Employees are prohibited from acting where there is, or may be, a conflict between their personal interests and the interests of our companies. This Code sets a minimum standard; where local legislation or culture exceeds these standards, they must be adhered to.

## Bribery, Gifts & Improper Advantages

In our work, the integrity of our company and its employees must at all times be beyond any doubt. It is your and our responsibility to protect a fair and integer way of working. Improper gifts and bribery, for example, are unacceptable. We can achieve integrity and fairness together, by observing the guidance and rules set out in this Code.

Various laws in each of the countries in which we are active prohibit bribery in different settings. For Recruit, the rule is very simple – do not bribe. Bribery is unacceptable and must be eliminated.

Improper gifts and other advantages received or offered undermine our integrity and are also strictly forbidden. Offering or receiving gifts have a risk that this also qualifies as ‘bribery’. That is the reason that these acts are subject to strict rules. If these rules are not adhered to, these actions are strictly prohibited.





# Anti-fraud

## What is Fraud?

Fraud encompasses numerous acts that share common characteristics: they are intentional, wrongful or criminal, involve deception or misleading behavior, and result in improper gain, advantage, or other benefits for a person or a company. While a single clear definition of fraud does not exist and is undesirable, it is important to emphasize that any unacceptable behavior, whether or not it can be strictly qualified as fraud, will not be tolerated.

## What We Expect

At RGF Staffing, any behavior intended to deceive or mislead others is unacceptable and will not be tolerated. We are all required to prevent fraud and report any fraud or suspicion of fraud. This Code sets out a minimum anti-fraud standard, describes our responsibilities, and provides guidance on how to act on (suspected) fraud. Any illegal or criminal acts will be reported to the competent authorities (e.g., local police). Fraud is a direct attack on our company, its resources, values, working environment, and people. There is zero tolerance for fraudulent or illegal acts. We are all committed to preventing, detecting, reporting, and acting on fraud, and will work together with our customers and suppliers to reduce opportunities for fraud.



## Money Laundering

Money laundering involves disguising the origins of money obtained through illegal activities, such as drug trafficking, terrorism, or fraud, so that it appears legitimate. This deceptive behavior undermines the integrity of financial markets and the trust of our stakeholders. As a company committed to ethical practices, we strictly prohibit any form of money laundering and implement measures to detect and prevent such activities.

## Insider Trading

We are committed to preserving the integrity and transparency of the financial markets. Insider trading, which involves buying or selling a publicly traded company's stock based on non-public, material information, is strictly prohibited. This practice is unethical and illegal in most jurisdictions, undermining the trust of our stakeholders. We have zero tolerance for insider trading and any actions that undermine investor confidence. All employees must adhere to this Code and the laws governing insider trading. By upholding these standards, we ensure that our financial practices remain ethical, transparent, and accountable.

## Financial Integrity

Maintaining financial integrity is crucial to the success and reputation of our company. We are unwavering in our commitment to uphold the highest standards of financial integrity, believing that accurate and transparent financial practices are essential to our success and the trust of our stakeholders. We conduct our financial affairs with the highest standards of accuracy, transparency, and accountability. Our leadership is expected to champion these values and set the tone for ethical behavior across the organization. . Any breach of these standards will be addressed promptly, and appropriate actions will be taken to uphold the integrity of our company. Together, we can ensure that our financial practices remain transparent, ethical, and accountable.





## Contacts with Illegal Persons & Organizations

We want to work fair and operate with integrity. This means that there are limits to the services we provide and the business relations we are willing to provide them to.

We are committed to complying with the sanctions laws and regulations of all jurisdictions in which we operate, including, but not limited to; the United Nations (UN), Australia (AU), the European Union (EU), Japan (JP) and the United States (US).

In addition, we strongly reject and prohibit any and all interactions or relationships with persons who, or organizations which, are involved in any criminal activity. If criminal activity is discovered, a relationship or interaction must be terminated immediately, and the reporting requirements set out below must be strictly observed.

This Code defines the minimum standards which each of our companies must comply with to meet the above obligations. Our company ensures compliance with applicable laws and regulations.



## Sanctions

In response to violations of international law, human rights abuses, other state-sponsored crimes, and threats to international security, such as terrorism, governments may impose sanctions against designated targets around the world. Our company is committed to cooperating with authorities to combat these threats. We comply with the sanctions regimes established in each country where we operate, which include restrictive measures regarding specific countries, entities, persons, sectors, goods, and services. We prohibit any business activities, personal transactions, customer relationships, or facilitating transactions that may violate applicable sanctions laws, involve individuals or entities on official sanctions lists, are connected to sanctioned countries/locations, or potentially circumvent sanctions laws. Each of our companies must familiarize themselves with and comply with the applicable sanctions laws and regulations in their jurisdiction.





## Communication with the Public Online & Offline (Press/Social Media)

Our company is dedicated to preserving the integrity and transparency of our communications with the public. We have zero tolerance for misinformation, unapproved disclosures, or any actions that could undermine our reputation. All employees must adhere to this Code and the guidelines governing public communications. Any breach of this Code will result in disciplinary action, including potential termination and legal consequences. By upholding these standards, we ensure that our public interactions are ethical, transparent, and accountable.

Effective and responsible communication with the public is essential to maintaining the integrity and reputation of our company. Every public statement and interaction reflect on our values and commitments. Therefore, all communications should be accurate, transparent, and timely, ensuring compliance with legal and ethical standards.

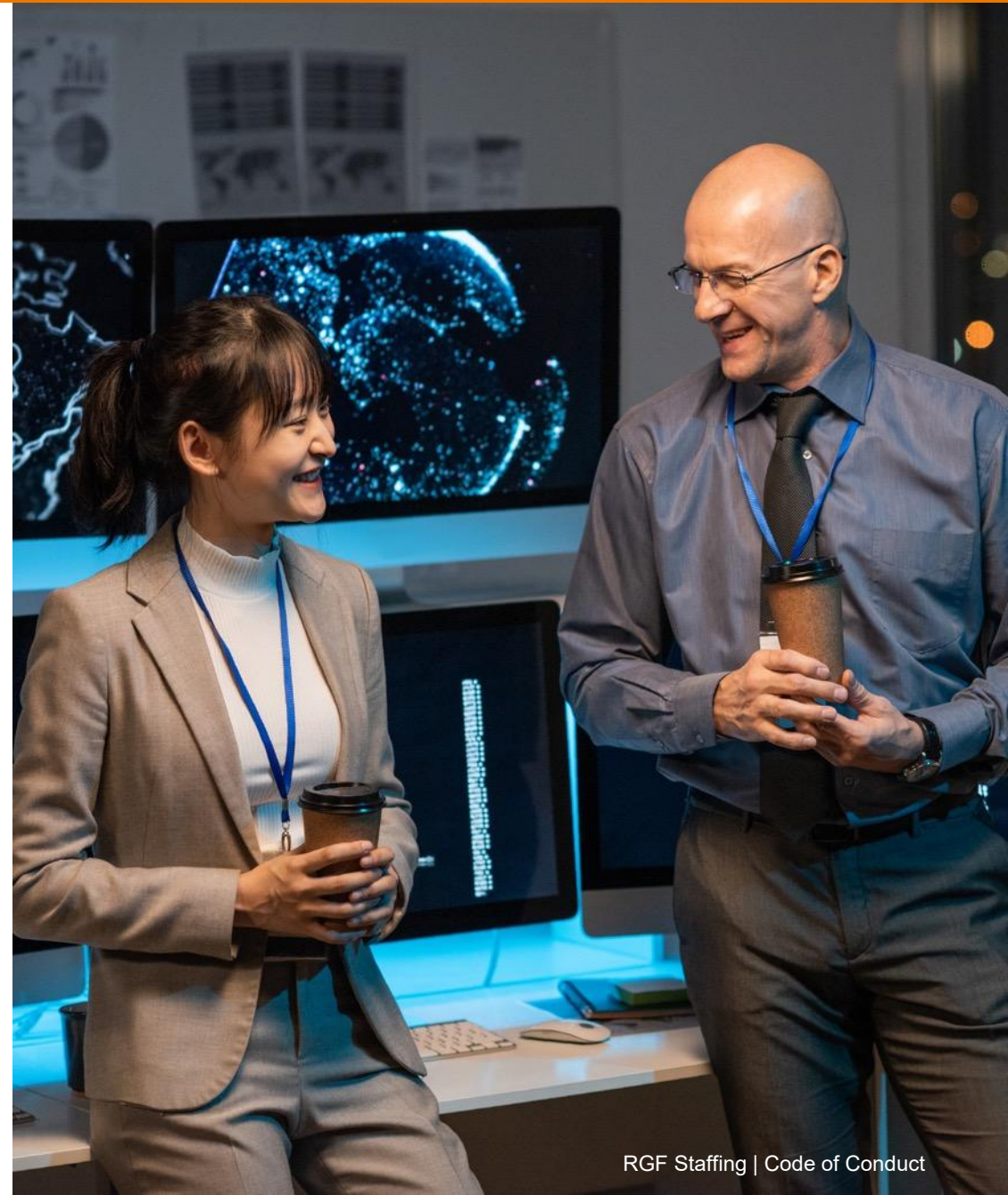
Our brand identity is of great value and must be protected at all times. We refrain from any negative public communication regarding our company or its brands, regardless of the form or media. Employees should always refer to the brand/communications policy and contact the responsible colleague for brand management in any communication involving our brand. Key principles include contacting the Communications or Social Media Manager before publishing content, not creating company-branded accounts without authorization, being mindful of what is posted, ensuring accuracy and legality of content, maintaining professionalism, and refraining from disapproving remarks about non-work-related matters.



## Use of Artificial Intelligence

Our company is dedicated to the ethical and transparent use of Artificial Intelligence (AI) in all our operations. We take the risks of discrimination, bias or privacy concerns very seriously. Should any issues arise that conflict with this Code, we will address them appropriately and in line with legal requirements. As more jurisdictions implement specific guidelines and legal regulations in the responsible use of AI (such as the EU AI Act, specific state laws in the US and the impending AI regulation in Japan), we are dedicated to respecting and complying with these standards in all the regions where we operate.

Artificial Intelligence holds transformative potential in enhancing our staffing services by enabling faster and more precise execution of our key processes. At the same time, we recognize the importance of deploying AI carefully and with diligence to prevent discrimination and bias. By upholding these standards, we ensure that our use of AI is responsible, transparent, and aligned with our core values.



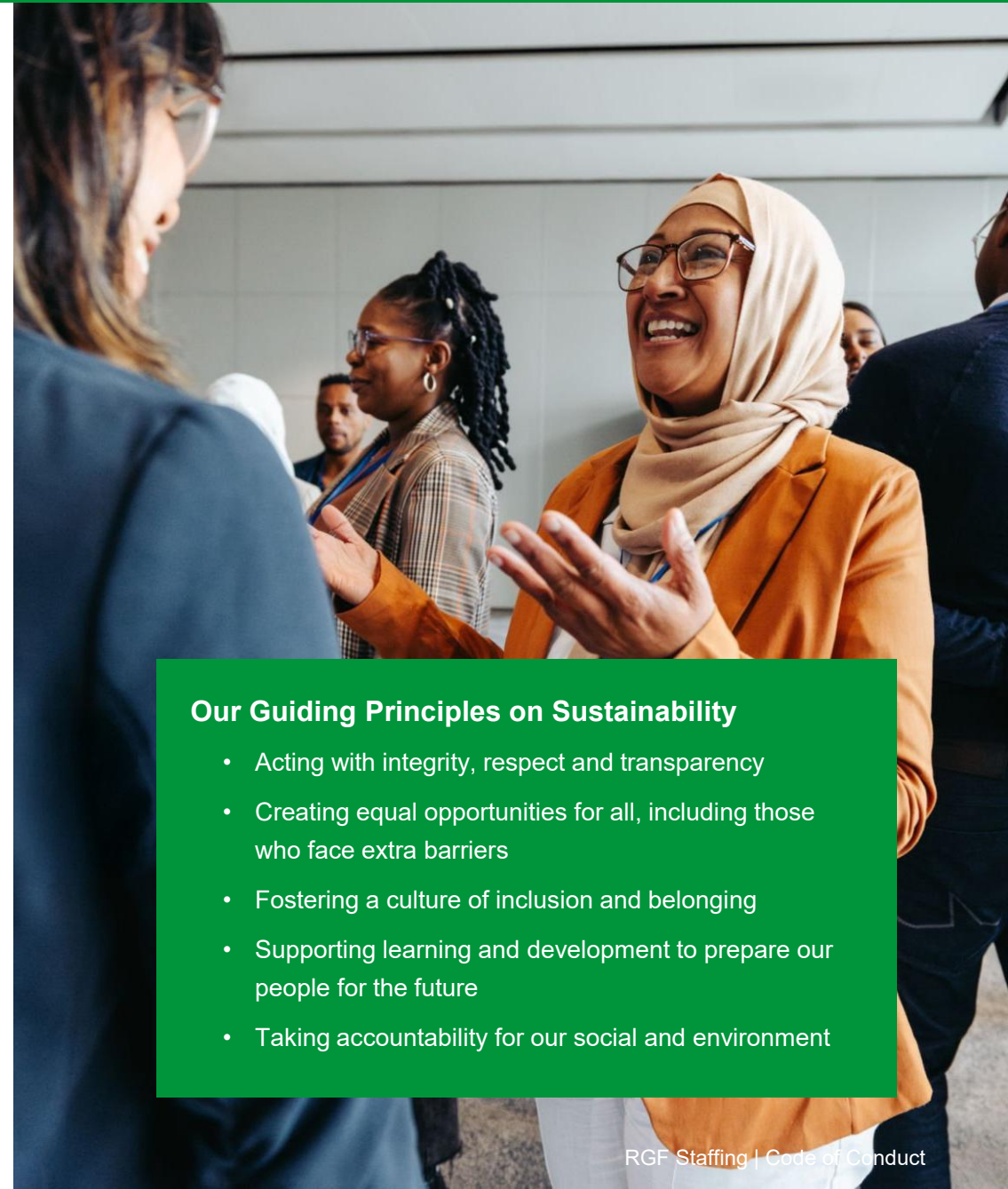


## Social Responsibility

Social Responsibility and Sustainability is about our people and our planet. We as a company have a responsibility to contribute to a safe, fair and healthy workplace. At the same time, we take care of our planet through all our activities. Our sustainable business model combines human capital, inclusion, and environmental impact. Our role in society is clear. As a provider of HR and staffing services, we are uniquely positioned to make a positive impact on numerous lives. We believe in a sustainable future in which work is accessible to everyone. We want to contribute to a labor market that is fair, inclusive and future-ready for all. We focus on creating new value for society in order to contribute to a brighter world where all individuals, all people, can live life to the fullest.

### What We Expect

We believe that work is more than just a job — it is a path to self-esteem, independence, and connection. We have a unique role in society: to connect people with meaningful work, and to do so in a way that is fair, inclusive, and future-ready. We embrace our responsibility towards society by committing to ethical behavior, equal opportunity, environmental responsibility and social engagement. When work is accessible to everyone, not only the individual grows, but society as a whole. This responsibility also includes care for the planet. We recognize the environmental impact of our operations and aim to contribute to a more sustainable future through conscious choices and thoughtful practices. Through programs such as RGF Connect, we further expand our social impact by encouraging our employees to actively engage with their communities. These initiatives reflect our values of respect, integrity, and inclusivity — and support our goal of building a fairer and more sustainable society for all.



### Our Guiding Principles on Sustainability

- Acting with integrity, respect and transparency
- Creating equal opportunities for all, including those who face extra barriers
- Fostering a culture of inclusion and belonging
- Supporting learning and development to prepare our people for the future
- Taking accountability for our social and environment

## Our Commitments & Behaviors

### 1. Inclusion & Belonging

We value and respect every individual. We create workplaces where everyone feels safe, included and heard — not in spite of who they are, but because of it.

### 2. Creating Equal Opportunities

We believe work should be accessible to all, regardless of background, gender, age, ethnicity, race, sexual orientation, gender identity, neurodiversity, socioeconomic status, religion, political or other opinion, nationality, disability, marital status, and work and life experience. We are actively committed to making work more accessible to everyone, including those who need it extra. Through local programs like RGF Connect, we create job opportunities for people with a distance to the labor market.

### 3. Learning & Development

We help people not only get a job, but also skills for the future. Through learning and development, we ensure that our employees remain relevant in a changing world and labor market.

### 4. Ethical Business Conduct

We recognize the impact of our industry and are committed to fair working conditions, ethical business practices, and adherence to international, regional or local human rights standards.

### 5. Environmental Responsibility

Our goal is to reduce our environmental footprint and achieve carbon-neutrality by 2030. We collaborate with stakeholders to reduce environmental impact. Every small action helps create a healthier planet.





## Grievance & Misconduct Reporting

By aligning with the values outlined in this Code of Conduct and related policies, we aim to foster a respectful, safe, and inclusive environment across all our interactions. We trust that our employees will uphold these principles and refrain from any behavior that contradicts them.

Violations of this Code, applicable laws, or related policies can have serious consequences. These affect not only the individuals involved but also the broader organizational culture and reputation. Such breaches may result in regulatory penalties, reputational harm, and loss of trust among stakeholders. For this reason, we treat any misconduct as a serious matter and a direct challenge to the values we stand for.

Concerns or grievances related to misconduct should be reported through the appropriate channels within the local operating company, following its established procedures. In cases where local reporting is not feasible, RGF Staffing provides an additional Whistleblower Hotline at headquarters to ensure that concerns can be raised confidentially and responsibly.



