

randstad hellas policy

policy for the elimination of
violence, intimidation and
harassment in the workplace.



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intimidation and harassment in the
workplace.

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Applicable

Applicable in the current version only in Greece and solely for purposes of Law 4808/2021. The present does not amend other Randstad policies.

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 and actions of violence or harassment that are caused by or linked to our operations and services, and addressing such impacts if they occur.

Our principles & commitments

At the Randstad Group we have [Human Rights Policy](#), which 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.
2. We treat others fairly, act with care and consideration, and respect human rights.
3. We do not tolerate violence, intimidation or harassment in any form and we support our workers who are victims of domestic violence.
4. We respect the right to privacy, ensure that confidential information is kept confidential, and we do not abuse the confidential information of others.
5. 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.
6. We regard health and safety in our business as the utmost priority. This includes both our own employees and our candidates (temporary workers).

This policy for the Elimination Of Violence And Harassment In The Workplace constitutes an integral part of our [Human Rights Policy](#) for Randstad Greece, and expressing our zero tolerance for violence, intimidation and harassment in the workplace, and the explicit commitment:

- A. to receive, investigate and manage any complaint or report on these matters in confidence and in a manner that respects human dignity, and not to place any kind of obstacles in the receipt, investigation and management of such complaints or reports,
- B. to provide assistance and access to any competent public, administrative or judicial authority in the investigation of such an incident or conduct,
- C. to provide our employees with information on the potential risks of violence, intimidation and harassment in the workplace and related prevention and protection measures,

- D. to make accessible information on company-wide procedures for reporting and dealing with such conduct, as well as contact details for the relevant administrative and judicial authorities in accordance with the provisions in force.

To whom this policy refers to

The present policy applies to all groups of our employees, including temporary employees, contractors, independent services providers, paid staff, employees through third-party service providers, as well as persons under training status, volunteers, persons whose employment relationship has ended, as well as job applicants and job seekers.

What we consider as violence, intimidation or harassment

Violence, intimidation or harassment 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 violence, intimidation 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.

What are our main actions to eliminate violence & harassment

- A. We are in constant cooperation with our local health physician so as to allocate and assess any psychosocial risks as well as risks of violence and harassment at the workplace.
- B. We are dedicated to constantly providing information and undertaking actions so as to eliminate harassment in any form, and also support our workers who are victims of domestic violence.
- C. All new hires on behalf of our clients shall be informed during onboarding regarding the present guidelines and part of the compliance training, while temporary employees are informed during their hiring process through the [employee portal](#).
- D. Our Local Integrity Officer ([Kiki Avgoustatou](#)) acts as the contact person who shall guide and inform all stakeholders on the prevention and treatment of

violence and harassment at work. The Local Integrity Officer shall be also available to all stakeholders reporting respective incidents so as to inform them about their rights, responsibilities and respective process.

- E. In accordance with the [Randstad Group Misconduct Reporting Procedure](#) we have established dedicated channels through which stakeholders may voice concerns. These channels include both local reporting mechanisms in place at company level, and, for serious misconduct, through our [Integrity Line](#), the Randstad Group reporting facility.

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, directly to local management and through the 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. 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.

Rights and obligations

All Randstad stakeholders including employees and temps are entitled to a working environment free from violence, intimidation, or harassment.

All Randstad stakeholders including employees and temps have the right to report incidents of violence, intimidation, or harassment through the misconduct reporting procedure ([link](#)) or to the competent Greek Authorities.

Randstad shall keep the identity of all Complainants confidential to the extent that this is practicable and shall safeguard that no retaliation against good-faith Complainants will be tolerated.

Randstad commits not to tolerate any incident of violence, intimidation, or harassment. and to protect the employment and support workers who are victims of domestic violence.

Randstad commits to examine any incident of violence, intimidation, or harassment in a diligent manner and in accordance with the misconduct reporting procedure and applicable laws.

Randstad commits to inform the employees, temps and stakeholders about their legal rights in relation to the application of the present policy.

Randstad commits to provide assistance and access to any competent public, administrative or judicial authority in the investigation of such an incident or conduct, if requested by them.

Misconduct reporting procedure

(Applicable in the current version only in Greece and solely for purposes of Law 4808/2021. The present does not amend other Randstad policies)

Randstad commits to post in the workplace and make accessible information on company-wide procedures for reporting and dealing with such conduct, as well as contact details for the relevant administrative and judicial authorities in accordance with the provisions in force.

1. purpose

As an international organization with a global emphasis on excellence, the Randstad Group expects all group companies and employees, including directors and officers, to behave at all times in accordance with our core values and Business Principles. This means acting responsibly, with integrity, and in compliance with Randstad policies and procedures, and applicable laws and regulations. We expect our employees to help Randstad maintain its excellent reputation by adhering to 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 accountability, and encourages all stakeholders to report any incidents where conduct falls short of our core values and/or the Business Principles. Any such report should be provided in accordance with this Misconduct Reporting Procedure.

2. our procedure

2.1 introduction

In order to assist in the reporting of (suspected) misconduct within the Randstad Group, we have established dedicated channels through which stakeholders may voice concerns, either through local reporting mechanisms in place at company level or, for serious misconduct, through our [Integrity Line](#), the Randstad Group reporting facility (see paragraph 2.3 below).

All concerns raised in accordance with our official procedures will be treated confidentially (except as required to conduct an adequate investigation (including the right of reply of the accused) and, if necessary, to take appropriate action) and with the complete assurance that there will be no retaliation against any employee filing 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 relating to the Randstad Group.

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

- breaches of human rights principles
- health and safety failures
- breaches of Randstad's Business Principles
- breaches of Randstad's policies or procedures (e.g., anti-competitive practices, discrimination, harassment, bribery, fraud, Policy For The Elimination Of Violence And Harassment In The Workplace)
- criminal offences
- failure to comply with obligations imposed by law or regulation (including incorrect finance and accounting practices)
- personal misconduct or disrespectful behavior

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

2.2 some definitions

Randstad Group means Randstad N.V. and/or any of its subsidiaries

The Complainant is anyone, whether within or outside the Randstad Group, who submits – in good faith and having a reasonable suspicion and/or evidence of potential misconduct – a report (also referred to as a complaint or concern) regarding misconduct within or relating to the Randstad Group Business Principles: see <https://www.randstad.com/about-randstad/corporate-governance/business-principles/>

The Integrity Line is the reporting facility consisting of a telephone hotline, accessible 24 hours per day via free-phone local access numbers, and a secure webpage, operated by an independent external provider.

The Local Integrity Officer is the person or function that ensures that all cases reported to the Integrity Line are investigated and dealt with in a lawful and timely manner, and fully respecting the rights of all individuals involved. Every country/Randstad Group company (including Randstad N.V.) has its own Local Integrity Officer. The Local Integrity Officer may either 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 the Randstad N.V. Executive Board to coordinate integrity issues under this procedure and to provide regular reports

to the Executive Board, as well as an annual report to the Audit Committee of the Supervisory Board, on cases reported either via the Integrity Line or directly to the Central Integrity Officer. The Central Integrity Officer also ensures that any reports under this procedure on suspected misconduct by one or more members of the management team of a Randstad Group company are reviewed centrally.

2.3 reporting

Anyone who reasonably suspects or has witnessed misconduct is obliged to report it. Stakeholders are encouraged to first raise concerns through their normal (local) reporting channels, either through local management lines or regular local contacts, such as HR, legal, identified confidants, complaint desks, risk & audit, etc. Reporting to management is usually the fastest and preferred route, and the best way to ensure a good and open work environment throughout the Randstad Group.

The [Integrity Line](#) should not be used to bypass normal reporting procedures. It is only intended for situations when reporting through the normal reporting channels is likely to be inappropriate or ineffective, and should be considered as a last resort.

Reports can be submitted in the local language through the [Integrity Line](#) , which consists of a telephone hotline, accessible 24 hours per day via free phone local access numbers, and a secure webpage. Both are operated by an independent external provider. For full contact details and user instructions, see annex 2. Although reports can also be submitted anonymously, Randstad encourages Complainants to reveal their identity when they submit a report, as this greatly facilitates the investigation of the report.

In order to minimize unreliable and false reports, as well as for reasons of privacy protection, Randstad will only investigate anonymous reports received through the [Integrity Line](#).

2.4 handling of a report

Reports received through the [Integrity Line](#) are forwarded to the Local Integrity Officer for the company concerned. As standard, a copy of the report is also sent to the Central Integrity Officer.

The Local Integrity Officer will confirm receipt of a report to a Complainant through the [Integrity Line](#) within five working days. Insofar as it is appropriate and practicable, the Complainant will be kept informed of the progress of the investigation. However, for reasons of confidentiality and privacy, we may be prevented from sharing specific details of the investigation or actions taken.

If a report is submitted through the [Integrity Line](#), but should have been submitted through the normal (local) reporting procedures (e.g., payroll or general 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 reported cases that are appropriate for the [Integrity Line](#) are investigated and dealt with in a lawful and timely manner, and fully respecting the rights of all individuals involved. In certain instances, such cases may be referred to and handled by a local management representative and/or other relevant functions of the company, depending on the nature of the report. In these cases, the same practices with regard to confidentiality and no retaliation still apply.

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 is an indication that the report was made in bad faith.

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

Reports that relate to one or more members of the Randstad N.V. Executive Board or Supervisory Board will be handled by the Randstad N.V. Local Integrity Officer, who is a member of the Audit Committee.

Randstad expects management at all levels within the Randstad Group to handle all reports concerning any alleged misconduct seriously, confidentially, and in an expeditious manner, and to ensure that the Complainant is not confronted with retaliation. Management is obliged to fully cooperate with any investigation into alleged misconduct.

2.5 what happens after the investigation is concluded

After the investigation, prompt and appropriate corrective action will be taken when and as warranted in the judgment of the relevant management level, taking into account the relevant company functions (e.g., HR, legal) and the applicable legislation.

2.6 reporting in good faith or bad faith

Anyone who raises a concern in good faith will not be put at a disadvantage as a result thereof. If upon investigation no violation is discovered, no action will be taken against the Complainant, unless the concern was raised in bad faith. Reports are considered to have been made in bad faith if the Complainant knows that the report is substantially not true, and that this procedure is abused (a) because of personal grievances, (b) for personal benefit, or (c) to intentionally harm the Randstad Group or any of its employees, including officers and directors. The Randstad Group sees reporting in bad faith as a very serious offence. Any report made in bad faith by an employee will be considered a serious breach of the Business Principles. The Randstad Group may take further action, if appropriate, against any Complainant who knowingly makes a false accusation or acts with malicious intent. Further action may include disciplinary action, which could result in termination of employment.

2.7 protection from retaliation, rights and duties of the Complainant

The identity of all Complainants will be kept confidential to the extent that this is practicable and always in accordance with GDPR rules, and no retaliation against good-faith Complainants will be tolerated. Specifically, the Randstad Group will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee based on any good-faith report and lawful actions with respect to reporting misconduct. Any perceived retaliation should be promptly reported to the Central Integrity Officer.

Submitting a report does not automatically protect Complainants who themselves participated in the reported misconduct from disciplinary or other action related to their participation in the misconduct. However, the Randstad Group will take the fact that the Complainant made the report into account as a mitigating factor.

When a Complainant reports suspected or actual misconduct, the Complainant should continue to respect all contractual or other confidentiality obligations owed to the Randstad Group. The Complainant should therefore avoid any form of external or internal publicity without first making use of internal procedures, unless external reporting is required or otherwise authorized by applicable law. Randstad reserves its rights with regard to any 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 ongoing, the company may decide to no longer involve the Complainant in that investigation or to stop the investigation and take any other steps it considers necessary.

2.8 protection and rights of the accused

When a person is under investigation as a result of a report through this procedure, he/she will normally be notified of this fact within a reasonable timeframe, depending on the facts and circumstances and whether there is a perceived risk of destruction of evidence, retaliation and/or obstruction of the investigation.

Any person under investigation has the right to respond to the allegations and can appeal against any adverse findings or decisions.

2.9 data protection, privacy & confidentiality

Any personal data obtained as part of any report and investigation under this procedure (of the Complainant, any person under investigation, and any witnesses) will 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 will be deleted three months after a case is closed by the Local Integrity Officer, unless a longer retention period is required because of the nature of the allegations and/or investigation.

Personal data will only be shared with those who need to know and will be subject to an obligation of confidentiality to the extent possible and as consistent with the need to conduct an investigation and, if necessary, take appropriate action. Exceptions are possible when Randstad is under a legal or regulatory obligation to disclose the information or if the report is made in bad faith.

2.10 amendments

The Executive Board of Randstad N.V., after consultation with the Audit Committee, may amend this policy at any time in a manner consistent with the requirements of applicable laws and regulations, and will involve the Randstad European Works Council and the relevant Works Councils as appropriate.

Diemen, Netherlands
January 2019

randstad group

misconduct reporting procedure.

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 manager¹, privacy officer² or legal counsel³
- 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 or
- Submit a report or question through the Randstad Group Integrity Line⁴ (SpeakUp, managed by People Intouch, an independent external provider). On 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

4. 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.