ManpowerGroup Environment, Health and Safety Management System
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ManpowerGroup Values: People, Knowledge and Innovation

Socially responsible sustainability has been part of ManpowerGroup’s DNA since our company’s founding over 63 years ago. During that time we have built a solid reputation as an ethical business with a strong sense of mission, a truly human company. We are constantly striving to find ways to reduce our environmental impact and provide a safer, healthier and more pleasant working environment in a way that is consistent with our culture and values.

We care about people and the role that work plays in their lives. We are committed to improving global labor standards and connecting people to the universal dignity of decent work. Concern for employee well-being is a natural extension of this primary value, an integral part of our culture and the reason we pursue continuous improvement. We take pride in what we do and how we do it. A great work environment gives each of us great pride in working for a company with such a deeply-rooted culture. Our expertise in the changing world of work is reflected in the way we conduct ourselves with our own employees.

Our tradition of responsibility to the communities we serve means we conduct our business with respect and consideration for the environment. Our environmental impact is small compared to that of manufacturing companies. Our global presence in over 80 countries and territories worldwide means we have an opportunity to play a key role and make a positive difference to the environment. Based on the principles of Reduce / Re-use / Recycle, ManpowerGroup encourages responsible environmental stewardship. In this way, we help build more sustainable communities in which to live and work.

This document explains how we, as a company and as individuals, strive to comply with Environment, Health and Safety policies. The plan provides a fixed and flexible framework to make it truly effective across our organization. Our Environmental Management System (EMS) includes safety and will evolve over time as we continue to improve in the future.

ManpowerGroup’s Business

ManpowerGroup™ (NYSE: MAN), the world leader in innovative workforce solutions, creates and delivers high-impact solutions that enable our clients to achieve their business goals and enhance their competitiveness. With over 60 years of experience, our $19 billion company creates unique value through a comprehensive suite of innovative solutions that help clients win in the Human Age. These solutions cover an entire range of talent-driven needs including recruitment and assessment, training and development, career management, outsourcing and workforce consulting.

ManpowerGroup’s 28,000 colleagues help our clients achieve business goals and enhance their competitiveness. We connect over 4 million people with the dignity and possibilities of work each year.

We care about the environment and aspire to be good stewards of resources and thought leaders in the contemporary world of work. We have built one of the world’s greenest headquarters as a
model for the future and we are a champion for carbon-free virtual work platforms. Our commitment to strong environmental stewardship is an element of our leadership in contemporary working. It is also consistent with our efforts to create practical solutions that align with the interests of our clients, colleagues, communities, investors and other stakeholders and help us attract, engage and retain the best possible talent for our staff and client needs.

As a service organization, ManpowerGroup’s operations are entirely office-based with an environmental impact that is relatively small compared to other companies with more obvious carbon footprints, such as those in the manufacturing or transportation sectors. And, we believe that even office-based businesses have an opportunity and responsibility to reduce their environmental impact and strive to be more sustainable.

We will continue to follow the basic principles of Reduce/Reuse/Recycle to conserve energy and water. We aim to reduce our carbon footprint, emissions and paper, electronic and other waste, to the extent that is reasonable and possible. We believe the primary safety concerns in our office-based environment are fire safety, slips, falls and ergonomics.

Purpose: Environment, Health and Safety Management System (EMS)

ManpowerGroup’s EMS is designed to determine, measure and improve our EMS performance by reducing our impacts on the natural environment and creating safer work environments for our colleagues. The EMS is a tool to develop policies, practices, and procedures in a systematic manner in order to develop and assess goals, outcomes and expected improvements.

As with any good management system, this EMS – which is based upon ISO 14001 - follows the Plan, Do, Check and Act model for continuous improvement. This EMS manual is the central document for identifying and controlling all EMS-related information and material, and provides reference to all supporting documents (many of which are contained in this document as appendices.)

Scope

Initially this EMS will include our world headquarters and our largest entities worldwide, accounting for 90% of ManpowerGroup’s revenue.

The EMS provides for the identification of environmental aspects and impacts and a systematic approach to identify areas of improvement in environmental performance for the entities in scope including, but not limited to, CO2 emissions (Scope 1 and Scope 2), paper and water use and waste generation and recycling. The EMS defines efforts to improve employee health and safety and data gathering and reporting to the extent that these in-scope entities can control and directly manage. It also includes those aspects we do not control or directly manage but can be expected to reasonably influence.

The EMS Includes:

- Twenty entities that account for 90% of revenue
  - World Headquarters, regional and entity operational and staff headquarters
• Utilizes direct measurement (e.g. metering) where possible with an effort to determine an effective, practical method for reporting indirect measurements if possible

• Employees (entities’ staff members)

The EMS does not presently include:

• Field branch offices (unless noted by exception)

• Associates (unless noted by exception)

Stakeholders

• ManpowerGroup cares about the natural environment as an extension of our daily commitment to empower more sustainable communities in which to live, work and play.

• We strive to provide a safe and healthy work environment for our colleagues.

• Increasingly our customers, colleagues, non-governmental organizations (NGOs), the Socially Responsible Investing (SRI) Community and our neighbors expect greater detail and transparency about our EMS performance.

• Clients especially are requesting more information on our environmental impact (and efforts to reduce them) including carbon footprint and risk mitigation as part of their supply chain strategies and requirements.

• Colleagues, candidates, associates, investors, analysts and other stakeholders are drawn to companies that demonstrate sound management and innovation through socially responsible business practices including improved EMS performance, greater sustainability, improved social impact, ethical governance and transparency.
Environment, Health and Safety Management System (EMS) Policy and Plan
Environment, Health and Safety Management System (EMS) Policy and Plan

ManpowerGroup Environment, Health and Safety Policy (ISO Section 4.2.1)

It is the policy of ManpowerGroup, its divisions and subsidiaries to conduct business in a responsible way and in a manner designed to protect the health and safety of our colleagues, customers, the public and the environment.

As a good corporate citizen, we must be conscious of the effects of our operations on the environment. We therefore will continually evaluate and assess our operations and business processes in order to reduce adverse environmental and health and safety impacts. We shall strive toward being a more sustainable company and fulfilling our vision of “creating and delivering innovative workforce solutions and services that enable our clients to win in the changing world of work.”

The Company is committed to providing a healthy and safe workplace for our colleagues, associates, contractors, visitors and neighbors and will operate our facilities and business processes in a manner that is harmonious with the communities in which we are located.

ManpowerGroup will comply with the spirit and letter of applicable Environmental, Health and Safety (EMS) regulations including national and local laws relating to the protection of employees, the public and the environment. We will supplement compliance with local laws and regulations with our own EMS Guidance and Policies, to provide a baseline framework for all of our business operations and processes worldwide.

ManpowerGroup has developed an EMS Steering Committee that, along with entity and senior management, will ensure that our EMS Policy is implemented globally. As colleagues in ManpowerGroup, we have a shared responsibility to do our best to follow regulations and company policies to protect our colleagues, the community and the environment.

ManpowerGroup will carry out this Policy as follows:

- Develop and maintain specific Environmental, Health and Safety Guidance and Programs that provide direction and demonstrate commitment to all of our colleagues. Our operations and business processes shall follow applicable local requirements and/or the company policies.

- Develop and maintain an EMS review program to ensure that the Company EMS Policy is being implemented and our operations are in compliance with applicable EMS regulations.

- Provide a healthy and safe environment for all colleagues, contractors, visitors and neighbors with the ultimate goal of zero incidents.

- Prevent or reduce adverse environmental impacts from our operations and business processes to the extent possible.
• Establish appropriate forums for facilitating communication and disseminating environmental, health and safety information throughout the Company.

• Conduct EMS competency and awareness training for personnel within the Company, appropriately aligned to each role/position.

• Evaluate the performance of the Company’s EMS programs through annual reporting to promote continuous improvement.

• Continually improve our operations and business processes so that they incorporate the principles of pollution prevention, waste minimization and process safety.

• Ensure due diligence investigations for new property acquisitions and remediation of any environmentally impacted properties in a responsible manner.

• Consider internal and external stakeholder points of view in the development of EMS policy.

• Publicly share our EMS performance in a transparent manner.

**ManpowerGroup’s EMS as a Framework**

The EMS provides a fixed and flexible framework with a supporting strategy for moving our sustainability efforts forward and improving our Environment, Health and Safety (EMS) performance. Our Key Performance Indicators (KPIs) and goals are applicable to all in-scope entities and will benefit from local/global reporting.

The fixed and flexible framework provides guidance for achieving these goals through implementing and sharing best practices and procedures that our entities can adopt and implement as is appropriate for their business operations. Our knowledge sharing systems, workshops and other forums, provide the means to facilitate the transfer and replication of best practices. Each entity will have autonomy in determining how best to adapt to the guidance and implement programs and initiatives.

The EMS measurements and methodologies we develop and refine will enable us to track our progress. We see immediate opportunities in the areas of water and energy conservation to reduce our carbon footprint through source reduction and increased recycling, especially related to paper, printer cartridges, cafeteria waste and other disposables. Carbon neutral work models and reduced business travel present further opportunities for us and for our clients and colleagues to reduce our carbon footprint. We will measure our Safety performance via total recordable incidents and days away/restricted incident rates to the extent possible. Our goal is to provide an accident-free workplace.

This EMS is a first step in our effort to develop a systematic, global approach for determining, measuring and reducing our impact on the environment and our colleagues’ safety. The EMS will help with the development of guidance, procedures, practices and resources. It provides a systematic approach to develop and assess goals, outcomes and expected improvements. ManpowerGroup’s EMS is based on the elements of the ISO14001 framework with the long-term consideration for potential ISO certification.
Responsibilities and Integration

ManpowerGroup’s EMS involves ManpowerGroup colleagues across all in-scope entities as part of the company’s commitment to improved sustainability and reporting. The fixed and flexible framework aligns with the global/local nature of our business operations as we strive to integrate EMS considerations throughout the company’s operations.

ManpowerGroup’s Environment, Health and Safety Steering Committee (Committee), is responsible for developing the overall EMS strategy, guidance and reporting, as well as monitoring implementation. The Committee will establish ManpowerGroup’s sustainability goals which are initially planned as program-based and qualitative. Subsequent generations of goals will include quantifiable improvement targets. The Committee will be comprised of mid to senior level managers, representative of appropriate operations and staff departments such as: Social Responsibility, Legal, Facilities, Sourcing, Public Affairs, Marketing, Finance and Communications. It will be chaired by the Director of Social Responsibility initially.

ManpowerGroup’s management has overall responsibility for the health and safety of its employees and environmental performance of the organization. Our Code of Business Conduct and Ethics confirms that everyone is required to comply with all applicable environmental, health and safety laws and regulations and with ManpowerGroup’s own EMS policies and programs. EMS performance and programs will be reviewed by the EMS Teams or the operating entities, the Committee, ManpowerGroup’s senior management and most appropriate Board committee.

The EMS provides a means to communicate our sustainability efforts to colleagues, suppliers, stakeholders and the public. The system also provides the basis for training of employees who are responsible for performing this work and establishing a procedure for EMS self-assessments and periodic EMS reviews. ManpowerGroup senior management will periodically reference sustainability within their communications. Senior management will also review sustainability goals and progress along with EMS self-assessments and EMS reporting on a periodic basis (not less than annually) to ensure the appropriateness of planning, resources and progress.

Implementation Timeline

ManpowerGroup’s web-based application software will support data and information collection, analysis, review and reporting. Our comprehensive report will more fully apply the Global Reporting Initiative (GRI) Framework. It is planned for June 2012 and will include significant detail based on this EMS. ManpowerGroup will use the Deming Cycle process for continuous improvement: Plan, Do, Check, Act (PDCA). We will consider the cost and benefits of more formal EMS and energy review programs which may add value. The primary purpose of the EMS reviews is to evaluate compliance with applicable legal requirements and ManpowerGroup’s EMS including policies, procedures and practices. Energy reviews at sites we control may help to determine cost effective opportunities to reduce energy usage and reduce our carbon footprint and emissions. We may consider guest reviewers from other ManpowerGroup entities to facilitate knowledge transfer.

ManpowerGroup will announce its first generation program based sustainability goals in the 2012 GRI Sustainability Report. We will continue to report progress in subsequent Social Responsibility
reports. We expect to announce second generation quantitative goals in 2015 after the
determination of ManpowerGroup’s EMS baseline performance and an analysis of opportunities
for improvement.

Environment, Health and Safety Training

Relevant job-related training and training that supports the Code of Business Conduct,
environment, employee health and safety are integral to ManpowerGroup’s success and help to
ensure the success of our EMS. EMS training will be provided commensurate with employees’ job
responsibilities. The operating entities, leaders and compliance officer will ensure that appropriate
resources are provided.

Communication, Mindset and Culture

Communication is a key component of enhancing the sustainability mindset and culture within
ManpowerGroup. Our audiences include: colleagues, management, Board of Directors as well
as clients, suppliers, candidates, communities, shareholders, non-governmental organizations
(NGOs) and other stakeholders. We will utilize a variety of communications vehicles to convey the
stewardship and safety message in a transparent manner including: internet and intranet sites,
annual reports, newsletters, and more. We will attempt to tailor messaging and media for specific,
targeted groups to ensure our initiatives are readily understood and relevant.

It is important for everyone to feel accountable and responsible for the sustainability efforts of
ManpowerGroup. We will align our goals with sound business practices, our strategies and the
needs of our stakeholders so that environmental stewardship and safety practices and thought-
leadership contribute to the ManpowerGroup Experience.
Alignment with ISO 14001
Alignment with ISO 14001

Implementation Schedule (Proposed)

In 2010, ManpowerGroup committed to the development and implementation of the GRI Framework and EMS for improvements in practices, measurement and reporting. In Q1 and Q2 2011, a Working Committee consisting of Subject Matter Experts (SMEs) from a number of ManpowerGroup entities began drafting the EMS. Members of that team will form the core of the Steering Committee which will monitor and update this tentative schedule periodically with members of Senior Management to ensure alignment.

- August 2011 – Develop content for the 2010 GRI Report with existing sustainability metrics and capabilities.
- 3Q 2011 – Formalize the Steering Committee
  - Develop formal charter
  - Revise the EMS Policy
  - Develop and endorse first generation program based sustainability goals for senior management approval
- 4Q 2011 – Implement the EMS web-application software
  - Data Collection in 2012 and beyond
  - Forum for Best Practice sharing
- Q1 2012 – Entity EMS Committees
  - Establish local charters
  - Review fixed/flexible framework for EMS
  - Collect data from each in scope entity
- Q1 2012 – First full quarterly EHS metrics
  - Enablon system fully implemented
  - Data from all in-scope entities
- Q1 2012 – Consider approach to annual site EMS self-assessment tool
  - On-line as part of the Enablon database
  - Self-assess compliance with applicable laws and regulations as well as ManpowerGroup EMS Guidance
  - Results to be reviewed by Steering Committee
• Q1 2012 – Obtain senior management approval for public EMS goals

• Q1 2012 – Include sustainability information in The Buzz

• Work with Global Communications for ongoing messaging, CEO and entity leaders’ speeches, etc. Q2 2012 (Earth Day – April 22 – Tentative) - Report on 2011 Sustainability Metrics in GRI Report
  – Announce ManpowerGroup EMS in GRI Report
  – Announce ManpowerGroup’s first generation Sustainability Goals

• Q2 2012 – Quarterly best practice and opportunities/challenges knowledge sharing in Cognis and/or webinars

• Q2 2012 – Entities to provide EMS Goals and Plans to Steering Committee
  – Plans to include entity-based implementation schedule of EMS programs
  – Include milestone dates
  – To be reviewed and consolidated by Steering Committee

• Q3 2012 – Consider an energy review program
  – In-scope only or beyond.
  – Actual versus estimates
  – Opportunities versus costs

• Q1 2013 – Invite Sourcing to consider a waste vendor consolidation and improvement program
  – Reduce number of vendors
  – Reduce costs, improve process and data
  – Mindset “sustainability partners” not waste disposal companies

• Q1 2013 – Launch site EMS review program
  – Develop a schedule (3 years)

• Review compliance
  – Q3 2013 – Sourcing to consider how to extend Green Dining program
  – Best practices sharing
  – Consider preferred suppliers
Environment, Health and Safety Aspects and Impacts (ISO Section 4.3.1)

Based upon the current understanding of the EMS aspects caused by our in-scope entities worldwide we believe the most significant EMS impacts are as follows:

- Employee Health and Safety
- Energy Use/CO2 Emissions
- Waste Management
- Paper and Water Use

We plan to further investigate and better understand the EMS aspects and impacts of our operations by continuing to gather Corporate Social Responsibility (CSR) information, including EMS information, from our in-scope entities via the annual ManpowerGroup CSR survey. We will continue to better understand the EMS aspects and impacts at our entities, especially related to the following (if any): hazardous waste from printing and paint supplies, boilers, maintenance, fuel, lighting retrofits, disposal of bulbs/fixtures, asbestos, PCBs and electronic waste.

We will look for health and safety performances trends (if any) and work to reduce the causes of lost time with programs to minimize these issues.

In addition we plan to implement annual entity EMS self-assessments to be supported by the web-based database software. The format and content of these self-assessments will greatly help us further understand the EMS programs in place at our entities and identify opportunities for EMS compliance and performance improvements.

EMS aspects and impacts will be a standing agenda item on the quarterly meeting schedule of the Corporate EMS Steering Committee as well as the entity level EMS Committees.

Legal and Other Requirements (ISO Section 4.3.2)

Each ManpowerGroup entity is responsible for establishing a procedure for identifying, assessing and communicating applicable EMS laws and regulations that are applicable to that entity. The Coordinator of the Entity EMS Committee and the Compliance Officer have responsibility for this effort. EMS information may generally be accessed through the EU, country or state environmental websites, EMS publications and trade associations. Pertinent regulations shall be identified, studied and communicated by the Coordinator of the Entity EMS Committee with the full understanding and backing of the Entity Manager. At least annually the Coordinator of the Entity EMS Committee will update the list of legal and other EMS requirements that are applicable to the entity.
While EMS compliance is the responsibility of each entity, ManpowerGroup programs will collaborate with entities for the most effective programs, including compliance, by methods such as:

- Annual EMS Self-Assessments (Q1 2012)
- Best Practice and Challenge/Opportunity Sharing (Q1 2012)
  - Via Cognis and the EMS database
  - Quarterly Webinars/Conference Calls
- EMS Compliance Reviews (Q1 2013)
  - Consider ManpowerGroup guest reviewers to facilitate knowledge sharing
  - To be conducted on a 3 year rotating cycle
- Energy Reviews (Q3 2012)
  - Consider ManpowerGroup guest reviewers to facilitate knowledge sharing
  - To be conducted on a 3 year rotating cycle

**Objectives, Targets and EMS Management Program (ISO Section 4.3.3)**

This section of the EMS discusses the proposed goals for ManpowerGroup based upon our current knowledge of the EMS aspects and impacts from our entities. The approach and proposed schedule may be modified as we more fully understand these aspects and impacts in the coming months. In general, our EMS objectives are to reduce employee accident and incident rates, use less water, consume less energy, manage paper usage—thus generating less CO2 emissions, and generating less waste while recycling as much of the waste we do generate as possible.

Our first generation EMS goals (covering the period of 2011 to 2014) will utilize program-based leading indicators. During this time we will measure our baseline environmental footprint and develop traditional EMS metrics (safety performance data, water use, paper usage, waste generation, and CO2 emissions) from our in-scope entities. We will look to drive improvements in our EMS performance while we collect EMS metrics via our EMS database to be rolled out Q4 2011.

We will begin to obtain verifiable EMS metrics in 2012 and by year-end 2014 expect to have three years of data which will provide a solid baseline for our environmental footprint. We plan to announce our second generation quantifiable EMS improvement targets in 2015 covering the period through 2020. We anticipate our third generation sustainability goals will cover the period to 2025 and so on for each subsequent five year period. ManpowerGroup’s sustainability goals will be approved by both our EMS Steering Committee and ManpowerGroup Management. Our proposed first generation EMS goals include:

**Governance**

- Establish a Corporate EMS Steering Committee – Q3 2011
• Establish EMS Steering Committees at all entities in-scope – Q1 2012
• Adopt and announce ManpowerGroup EMS Policy – Q2 2012

**Metrics**

• Launch EMS database for collection of EMS Metrics – Q4 2011
• Determine the set of common indicators and methods of consolidation
• Start on-going quarterly collection of EMS Metrics – Q1 2012

**Programs**

• Entities to implement **TOOLS FOR IMPLEMENTATION** to improve EMS performance – Q3 2011 and on-going
  – As appropriate to their operations
  – The Tools for Implementation are listed in the Appendices of this document

• Launch annual site EMS self-assessment tool – Q1 2012
  – On-line as part of the EMS database
  – To self-assess compliance with applicable laws and regulations as well as ManpowerGroup EMS Policies

• Entities prepare EMS Action Plans, send to Steering Committee – Q2 2012
  – Action Plans to include entity level implementation schedule for EMS programs
  – Programs to be pulled from Tools for Implementation in Appendices A-E of this document
  – Actions Plans to include milestone dates

• Launch site energy review program – Q3 2012
  – Review all entities on a continuing 3 yr. program for energy conservation opportunities

• Launch site EMS Review program – Q1 2013
  – Verify compliance with applicable laws and regulations as well as ManpowerGroup EMS Policies

• Evaluate waste vendor consolidation and improvement program – Q1 2013
  – Reduce number of vendors
  – Obtain preferred pricing
  – Engage “sustainability partners”, not waste disposal companies
ManpowerGroup’s second generation EMS goals are expected to focus on achieving quantifiable reductions in waste generation, water use and CO2 emissions resulting from the operation of the 20 in-scope entities while also achieving reductions in employee accident/incident rates. These quantifiable reduction targets will be cascaded and aligned so that corporate, business unit and individual objectives all support the overall ManpowerGroup EMS objectives.

ManpowerGroup expects to announce the first generation sustainability goals in the 2012 GRI Sustainability Report scheduled for publication in Q2 2012. We anticipate announcing second generation sustainability goals in the 2015 GRI Sustainability Report scheduled for publication in Q2 2015.

**Structure and Responsibility (ISO Section 4.4.1)**

ManpowerGroup’s EMS structure and programs are designed to integrate EMS considerations throughout the company’s in-scope operations.

ManpowerGroup’s senior management has overall responsibility for the health and safety of its employees and environmental performance of the organization. EMS performance and programs will be reviewed by ManpowerGroup’s senior management as well as the ManpowerGroup Board of Directors committee responsible for cooperate governance no less than annually. Senior management shall also review progress vs. sustainability goals and EMS self-assessments and review results on a not less than annual basis and ensure that appropriate resources are dedicated towards the ManpowerGroup sustainability efforts to ensure success. ManpowerGroup senior management will approve and facilitate the sustainability related communications and work to integrate sustainability into the culture of ManpowerGroup.

ManpowerGroup’s EMS Steering Committee is responsible for establishing the company’s worldwide sustainability strategy, the EMS requirements, and for monitoring their implementation. The EMS Steering Committee will propose the setting of ManpowerGroup’s sustainability goals (first program-based and later quantifiable improvement targets) to achieve positive results associated with identified significant environmental aspects as well as health and safety concerns. The final approval of ManpowerGroup’s EMS goals resides with senior management.

At the entity level the Coordinator of the entity EMS Committee, along with members of their team, shall have responsibility for implementing the EMS and for driving EMS performance. Resources shall be provided as needed for this effort by the Entity Manager. It is expected that the entity EMS Committees shall meet no less than quarterly and shall formally present the status of their EMS efforts, including the effectiveness of the EMS, to their Entity management no less than annually.

Ultimately, it is everyone’s responsibility to accept accountability for following all appropriate environment, health and safety laws and regulations as well as company EMS policy and requirements in order to protect themselves, their coworkers, their community and the environment. Employee participation and involvement in the ManpowerGroup EMS is critical to the success of the EMS and the achievement of our goals.
Training, Awareness and Competence (ISO Section 4.4.2)

Relevant environment, health and safety training is integral to the proper functioning of the EMS and success of ManpowerGroup’s sustainability program. EMS training commensurate with employees’ job responsibilities will be provided. The EMS Steering Committee at the corporate level, working in conjunction with the EMS Committees at the entity level, will ensure that appropriate resources are dedicated to this effort.

EMS implementation includes training for personnel on both general awareness and competency. Awareness training ensures that all ManpowerGroup personnel are familiar with the EMS and the company’s EMS goals. It also involves developing an understanding of the company EMS Policy and the potential significant EMS aspects and impacts of their work. Awareness training will be tied-in with the company’s overall internal sustainability communications efforts and may include additional formal and informal activities such as internal seminars or webinars by external sustainability thought leaders.

Competency training addresses EMS programs and procedures that are specific to work activities—such as maintenance, sourcing, “green cleaning” or “green dining” and even basic activities like how to perform double-sided printing.

The Entity EMS Committees are responsible for maintaining training records for both awareness and competency training at their respective entities.

Communication (ISO Section 4.4.3)

Communication is a key component of building a sustainability culture within ManpowerGroup. Both corporate and entities must utilize a variety of tools to convey the sustainability message in a consistent manner. ManpowerGroup’s audiences are internal (employees, management, Board of Directors) as well as external (the general public, the communities in which we operate, our shareholders, customers, suppliers, NGOs and the SRI community). We will utilize a variety of communication vehicles to convey the sustainability message in a transparent manner including: internet and intranet entities, annual reports, sustainability reports, site and corporate newsletters, and a variety of internal graphic and poster displays.

See Communications and Culture Guidance for more specific examples of communication strategies and vehicles.

EMS Documentation (ISO Section 4.4.4)

This EMS Manual identifies all documents relevant to the EMS. Many, but not all, relevant documents are embedded within the EMS as appendices. Interested parties can obtain copies of EMS documents from either the Corporate EMS Steering Committee or from the Entity EMS Committees.
Document Control (ISO Section 4.4.5)

ManpowerGroup will establish specific procedures for controlling pertinent documents related to the EMS. This section of the EMS will describe where documents can be located and how and when they are reviewed and will ensure that current versions of documents are available and that obsolete documents are promptly removed from use or are suitably identified. Document control shall by applicable at both the corporate entity level. Controlled documents are obtainable from either the Corporate EMS Steering Committee, or from the entity EMS Committees. A list of controlled documents is provided in APPENDIX D - MASTER DOCUMENT LIST. The controlled documents include but are not limited to EMS policies, list of aspects and impacts, objectives and targets, procedures and forms and checklists.

EMS documentation may be maintained in electronic and/or hard copy form. In either case the document control procedure shall be applied to ensure appropriate access to and control over all EMS documentation.

Operational Control (ISO Section 4.4.6)

At the corporate level the EMS Steering Committee is responsible for identifying enterprise-wide operations and activities associated with significant EMS aspects that require operational controls in procedures, work practices, and EMS policies or programs. At the entity level this responsibility resides with the EMS Committees.

These procedures and work practices ensure that the EMS is properly embedded in the day to day of ManpowerGroup.

Two types of Operational Control Procedures shall be developed and implemented:

- System Procedures - Cover the management and control of the principal EMS impacts. These procedures may apply to either the entire company (such as the company waste management guidance) or the specific entity, such as an entity specific policy on double-side printing.

- Work Practices - Cover the EMS control of specific operational activities, such as a defined task or business process. For example, this might involve including EMS elements in a boiler maintenance procedure.

The Corporate EMS Steering Committee and the Entity EMS Committees shall each develop an Operational Control Procedure Registry that lists all operational control procedures (ex: EMS policies and specific work procedures) for operations with the potential for significant EMS impact, if any.

Emergency Preparedness and Response (ISO Section 4.4.7)

Emergency preparedness and response plans identify the potential for and response to EMS accidents and emergency situations. These plans also address the prevention and mitigation of the EMS impacts of incidents and accidents that may occur.
The EMS includes emergency preparedness and response plans addressing potential enterprise-wide and entity specific EMS accidents and emergency situations. The emergency preparedness and response plans anticipate and address issues such as:

- Environmental Releases (if any)
  - Ex: waste shipments, fuel oil deliveries, leaking storage tanks
- Explosions
  - Ex: Boilers or other combustion equipment and pressure vessels
- Natural Disasters
  - Ex: Hurricanes, tornadoes, tsunamis and earthquakes
- Employee Health Issues
  - Ex: Heart attacks, strokes, slips and falls
- On-site and off-site incidents
  - Ex: Releases of radiation from a nearby Nuclear Energy Facility

The emergency preparedness and response plans also define the emergency command chain of authority with contact details for all emergency commanders and site emergency responders and provide for adequate training for emergencies. It lists emergency equipment available at the respective facility and indicates who has been trained and authorized to use that equipment.

The Corporate EMS Steering Committee and the Entity EMS Committees or another individual or group identified by senior management and/or the appropriate committee of the board of directors shall review emergency plans annually and make any needed improvements promptly. The emergency plan shall also be reviewed following any accidents or emergency situations that do occur and actions promptly immediately taken to minimize the recurrence of such an incident. The Entity EMS Committees shall also make every effort to familiarize local emergency responders (fire department, police department and hazmat teams) with the hazards and potential incidents posed by their facilities, if any.

**Monitoring and Measuring (ISO Section 4.5.1)**

As previously discussed, ManpowerGroup shall establish KPIs and set goals to drive performance improvements in the areas of employee health and safety, energy conservation/CO2, water use, and waste generation and recycling. In order to determine the effectiveness, and to verify that ManpowerGroup is improving its EMS performance and becoming more sustainable, ManpowerGroup’s EMS Steering Committee will review its EMS KPIs and progress towards its sustainability goals on a quarterly basis along with the results of its annual EMS self-assessments and periodic EMS and energy reviews. These results will also be shared and reviewed by senior management and the appropriate Board Level Committee as part of the annual EMS review.
Evaluation of Compliance (ISO Section 4.5.2)

Compliance with applicable EMS laws and regulations, as well as ManpowerGroup’s own internal EMS requirements, is the foundation of our EMS. All colleagues worldwide are required by the Code of Business Conduct and Ethics to comply with all applicable environmental, health and safety laws and regulations and with ManpowerGroup’s own EMS policies and programs.

The two key elements of verifying ManpowerGroup’s EMS compliance is the EMS review program, which we plan to begin implementing via EMS self-assessments in 2012 and on-site EMS reviews in 2013. These programs are described in detail in EMS Reviews.

Non-Conformity, Corrective and Preventive Action (ISO Section 4.5.3)

ManpowerGroup takes any non-conformity with our EMS very seriously, especially those concerning non-conformance with applicable legal and regulatory EMS compliance or ManpowerGroup’s internal EMS policies and procedures. As discussed in the sections on Evaluation of Compliance and EMS Reviews, ManpowerGroup expects to uncover any non-conformance with our EMS via the EMS review programs.

The results of these various reviews will be reviewed by the Entity and Corporate EMS Committees. The entities and corporate (via the EMS Steering Committee) will then agree on a remedial plan and a proposed time-line to complete that remedial plan. All discrepancies or concerns shall be tracked to closure using the action item tracking function in the EMS database. In addition, any corrective or preventative items that the local entities define will be tracked via the Corrective and Preventative Action tracking (CAPA) portion of our EMS application. The Entity and Corporate Compliance Officers have overall responsibility for verifying all action items are closed while at the entity level the Coordinator of the EMS team has responsibility for tracking their EMS CAPA to closure.

In addition, EMS performance metrics will be collected annually via our EMS database beginning in 2012. These results will be reviewed by both the Corporate EMS Steering Committee and the Entity EMS Committees. Any metrics that do not seem in line with past performance or performance at similar ManpowerGroup entities worldwide will be investigated. If needed, corrective actions will be put in place. Similarly, metrics that are not trending in the right direction will also be investigated and, if needed, corrective actions put in place.

All ManpowerGroup colleagues worldwide can also report any EMS issues to the most appropriate ManpowerGroup compliance representative in person, via the “hot-line” phone number or email, as outlined in the section of our Code of Business Conduct and Ethics entitled RESOURCES FOR OBTAINING GUIDANCE AND REPORTING OF CONCERNS.
Records (ISO Section 4.5.4)

All ManpowerGroup EMS records (both in paper and electronic form) relevant to the EMS shall be recorded and maintained so they are legible, identifiable, traceable, readily retrievable and protected against damage, deterioration and loss. This applies to EMS records retained at the corporate and entity levels, including but not limited to:

- training records
- procedures
- policies
- EMS review results and responses
- inspections
- incident and accident reports and investigations
- complaint reports and investigations
- raw data and calculations supporting EMS metric performance data
- EMS committee meeting minutes

EMS records shall be maintained as long as required by applicable country regulations.

Individual departments shall also maintain their own EMS records (i.e. in the case of department level EMS awareness or competency training) where applicable.

More specifically EMS records are to be maintained in an archive so as to be retrievable as needed, based on the following criteria:

- Include records of all data and information required in EMS programs as listed above
- Where applicable both electronic and paper copies of records should be maintained with supporting information, if possible.
- Ensure that EMS records are legible, identifiable and traceable to the activity, entity or service involved
- Ensure that EMS records are stored and maintained such that they are readily retrievable and protected against damage, deterioration or loss
- Ensure that the retention times of the EMS records have been established and recorded as required by applicable regulation.
EMS Reviews (ISO Section 4.5.5)

A key element of verifying ManpowerGroup’s EMS compliance is the EMS review program, which comprises annual entity self-assessments and periodic on-site compliance review reviews as well as periodic energy reviews.

ManpowerGroup intends to implement EMS self-assessments in 2012. The results of these EMS self-assessments shall be reported annually via the EMS database and reviewed by the Corporate EMS Steering Committee. Where follow-up is required, or resources needed, the Corporate EMS Steering Committee shall be responsible for verifying that the affected entity has taken appropriate action to ensure that any discrepancies or concerns are addressed in a prompt manner. (The Entity Manager has the direct responsibility for ensuring that appropriate resources are available to implement any corrective actions.) All discrepancies or concerns shall be tracked to closure using the action item tracking function in the EMS database.

In Q1 2013 we will implement on-site EMS compliance reviews on a three year rolling basis. In time, these reviews will be conducted by external qualified professional EMS reviewers and will be supplemented by internal ManpowerGroup staff in order to promote knowledge transfer. Any identified corrective actions or action items from these on-site reviews shall be tracked to closure using the action item tracking function in the EMS database. ManpowerGroup will also collect best practices from these reviews and will share them via our EMS database as well as via quarterly conference calls with our Entity EMS team leaders in order to promote knowledge transfer and continual improvement in EMS performance.

The results of these various reviews will be reviewed by the Entity EMS teams immediately after the completion of the review as well as on an as needed basis, the Corporate EMS Steering Committee on a quarterly basis and ManpowerGroup senior management on an annual basis as part of the annual EMS review. All identified non-conformances will result in an action item being entered into the EMS application action tracking system. The entities will then agree on a remedial plan and a proposed time-line to complete that remedial plan. Any action items—whether from self-assessments or on-site reviews—that become delinquent (past their agreed upon due date) shall be elevated up the ManpowerGroup chain of command, as appropriate.

On-site EMS compliance reviews will be comprehensive in nature and evaluate every aspect of an entity’s EMS programs including both program documentation and program implementation.

I. Program Documentation

   A. The EMS programs are properly documented and meet all applicable regulatory, legal and internal ManpowerGroup requirements.

   B. This will include a detailed review of all applicable documentation and records including but not limited to: hazardous waste manifests, permits, local regulations, training records, OSHA (or similar) logs, communication plans, metrics and any monitoring results.
II. Program Implementation

A. The programs are fully and properly implemented within the entity being assessed.

B. This will include field observations such as: personnel interviews, review of field logs and observations of personnel performing their duties as appropriate.

The primary driver for the energy assessments, to be implemented in 2013, will be energy conservation, not compliance. These reviews will determine cost effective opportunities to reduce energy usage and drive down carbon emissions. The energy reviews will be implemented on a three-year rolling cycle with approximately seven ManpowerGroup entities reviewed annually.

Management Review (ISO Section 4.6)

ManpowerGroup has a review system to verify that the EMS is working effectively and that the company and its entities are improving their EMS performance and making satisfactory progress towards their respective EMS goals. The levels of responsibility and review authority are summarized below.

Senior Management

- EMS performance and programs, including the results of self-assessments and EMS reviews as well as KPI and progress towards EMS goals and objectives, will be reviewed annually by ManpowerGroup’s senior management as well as the ManpowerGroup Board of Directors committee responsible for cooperate governance as part of the annual EMS review.

Corporate Steering Committee

- The Corporate EMS Steering Committee is charged with developing the EMS and for monitoring its implementation.

- In order to determine the effectiveness of the EMS, and to verify that ManpowerGroup is improving its EMS performance and becoming more sustainable, ManpowerGroup’s Corporate EMS Steering Committee will review its EMS KPI, as well as the results of its annual EMS self-reviews and periodic EMS and energy reviews, on a quarterly basis.

Entity-Level EMS Committees

- It is expected that the entity EMS Committees shall meet periodically to review their EMS performance and the effectiveness of their EMS and shall present the status of their EMS efforts, including the effectiveness of the EMS, to their entity management no less than annually.

Ultimately, however, it is everyone’s responsibility to accept accountability for following appropriate environment, health and safety laws and regulations as well as company EMS policy and requirements in order to protect themselves, their coworkers, their community and the environment. Employee participation and involvement in the ManpowerGroup EMS is critical to the success of the achievement of our EMS goals.
Guidance

Waste Management Guidance

I. Waste Management and Pollution Prevention Guidance
   A. Reduce or prevent the generation of waste to the extent possible.
   B. When wastes are generated manage them in accordance with the following hierarchy:
      1. Minimization (elimination of waste at the source—see “Green Sourcing”).
      2. Recycling - including reuse and energy recovery.
      3. Proper treatment and/or disposal to destroy or minimize the hazards presented.
         a. Compliant with local regulations and best practices.
   C. Encourage the use of ManpowerGroup preferred waste contractors for the
      management of any wastes generated at a ManpowerGroup entity.

II. SCOPE
    Within the fixed and flexible framework, each ManpowerGroup entity shall develop and
    implement a waste management program to meet the program objectives and requirements
    in addition to all applicable regulatory standards.

III. RESPONSIBILITIES
    The ManpowerGroup EMS Steering Committee is responsible for defining this guidance,
    seeking data and preparing a consolidated report.

IV. DEFINITIONS
    Pollution Prevention: Reduction or elimination of all wastes discharged to all media—land,
    air and water—to the extent possible and reasonable.
    Waste: All non-product output generated at ManpowerGroup entities. This includes non-
    hazardous, hazardous, special, petroleum-based and electronic waste.

V. GENERAL REQUIREMENTS
   A. Pollution Prevention and Waste Minimization
      1. Pollution prevention and waste minimization shall be made part of a written
         commitment and formal program. It is generally beneficial to ensure that the
         pollution prevention efforts includes a cross functional team.
      2. Qualitative and later quantitative sustainability/pollution prevention goals will be
         set as part of ManpowerGroup’s EMS efforts. Specific goals will focus on waste
         management—generally encouraging less waste be generated and that waste
generated be reused/recycled. These goals will be set by the Corporate EMS Steering Committee in conjunction with our entities worldwide. The goals will apply at a corporate, business entity [in scope] and possibly at the site level. ManpowerGroup’s goal is to reduce or prevent, to the extent practicable, the generation of all wastes, and the release, discharge and emission of pollutants to all environmental media including air, land, surface water and groundwater.

3. To the extent possible, ManpowerGroup entities will use the EMS database system to track the types and amounts of wastes generated and reused/recycled.

4. Activities and business processes that generate wastes shall be periodically assessed to identify opportunities for eliminating or reducing the quantity or hazard of the wastes generated.

B. Waste Characterization

1. All wastes generated on site shall be properly characterized with regard to regulatory classification. All waste characterizations shall be documented based on local regulations.

C. On-Site Waste Storage

1. Waste must be stored in appropriate containers that are in good condition, and are made of, or lined with, materials that will not react with and are otherwise compatible with the waste stored in it.

2. Waste containers shall be labeled with wording that properly identifies the container as waste as well as the specific contents of the container. (Ex: “garbage”, “universal waste/electronic waste”, “fluorescent bulbs/universal waste”, “hazardous waste/waste paint.”)

3. All waste areas are to be maintained and inspected by the most appropriate person and materials shall be disposed in a timely manner taking into consideration the local regulatory requirements and the hazardous nature of the wastes (if any). In no event shall wastes be stored on ManpowerGroup entities for over one year.

D. Waste Treatment and Disposal

1. Wastes shall be recycled or disposed via the use of ManpowerGroup preferred waste contractors wherever practical.

2. No aerosol cans or other pressurized products, regardless of contents, shall be discharged, punctured, shredded or crushed on-site. (This is a safety concern since improper handling of aerosol cans could result in explosions.)

3. ManpowerGroup entities are not permitted to accept third party waste.
4. All waste shall be handled in the appropriate manner and shall not be burned or buried or otherwise disposed onsite.

5. Waste disposal records, such as invoices or other business records, shall be kept according to local regulations.

Waste Management and Pollution Prevention – Program Tools

1. Paper and Printing Guidelines – In Office
   - Purchase and use recycled content copier/printer paper to the extent possible/practical.
   - Include a statement “printed on recycled paper” (or similar) as is appropriate.
   - Print only when necessary.
   - Set printer and copier defaults to two sided printing.
   - Train staff to print on one side only as needed.
   - Print in black and white vs. color where practical.
   - Use good quality multifunction units (printers and faxes).
   - Select bio-degradable (e.g. soy-based) or low or no VOC inks and toners when practical.

2. Printing Guidelines – Externally Sourced
   - Limit printing of marketing and other operational materials to the extent that is practical.
   - Specify that marketing materials are to be printed on recycled paper to the extent possible/practical.
   - Select bio-degradable (e.g. soy-based) or low or no VOC inks when practical.
   - When it is necessary to print, print in limited, reasonable quantities.
   - Print all materials double-sided when practical.

3. Cafeteria and Dining Services Supplies
   - Where possible, use reusable rather than disposable items for dining and cafeteria services (“Green Dining”). Where disposables must be used, limit the purchase of Styrofoam, paper and plastic cups, plates, and service items utilized and encourage the use of recycled content and other environmentally appropriate food service items.

   Encourage use of personal coffee mugs, tea cups and refillable water bottles. Provide incentives for colleagues to utilize reusable containers such as preferred pricing when refilling a reusable container.
4. Green Maintenance – Cleaning and Lawn Maintenance
   • Consider the environmental impacts of all cleaning operations. Where practical use “certified” green cleaning products.
   • Consider the environmental impact of all lawn and landscape maintenance operations. Where practical use “organic” or “integrated” lawn and pest management practices.

5. Green Sourcing
   • Consider the recycled content of all materials purchased, including but not limited to paper products.
   • Consider the overall environmental “life-cycle” impact of all purchasing decisions.

6. Waste Recycling
   • Make every effort to reduce waste generation at the source (e.g. packing materials).
   • Implement effective and easy to follow recycling programs as much as is practical. (Note that the entity waste contractor can often be leveraged to assist in this effort.)
   • Arrange recycling programs for paper, plastic, glass and electronic equipment. Provide convenient bins/receptacles and drop-off points.

7. Electronic Waste
   • Consider the useful life-cycle of all electronic equipment (laptops, printers, cell phones, etc.) at the time of purchase.
   • Consider and enact effective recycling or reuse for electronic waste (e.g. waste disposal through leasing arrangement, through electronic waste specialists, through donation to approved non-profit organizations, if possible) in compliance with all local and national regulations.

Energy Conservation Guidance

Manpower Groups’ Comprehensive Guidance for on Energy Conservation will be written and issued in 2012.

Energy Conservation – Program Tools

I. Electronic Equipment Purchasing
   A. As much as 25% of an office building energy consumption can be attributed to electronic office equipment.
   B. Consider the impact of buying energy efficient rated equipment. Energy efficient equipment can provide as much as 70% savings in some product areas.
1. Energy efficient equipment saves energy only when the power management features are activated and properly configured.

C. Reduce “phantom electricity drain” by turning electronic equipment off when not in use.
   1. Turning equipment off at night saves energy without affecting the long-term performance of the equipment. Estimates indicate that 30 – 70% of individual workstations are left on 24 hours a day.

II. Lighting Retrofits

A. On average, lighting accounts for 30 – 40% of an office building’s energy consumption. Significant energy consumption and cost savings are therefore attainable through energy efficient lighting system enhancements.

B. Daylighting can offer significant energy savings by offsetting a portion of the electric lighting load and by reducing the related cooling load by lowering internal gains associated with waste lamp heat. Internal reflection can have a significant impact on day lighting, so major room elements and furnishings should be of light-colored materials.

C. Lighting controls help trim both the amount of energy used and demand charges. Electric lighting can be controlled by giving occupants manual control over their personal lighting, by automatically controlling light levels based on occupancy or daylight levels, or by a combination of these strategies. Types of lighting controls and their applications:
   1. Manual dimming is best suited for individual offices, conference rooms, and classrooms where occupants can adjust the lighting level depending on the tasks and appearance of the area.
   2. Automated daylight dimming is an important lighting control strategy in spaces where there is a significant amount of natural light but where turning electric lights off altogether would be inappropriate.
   3. Occupancy Sensors (infrared and/or ultrasonic) provide an ideal way of turning lights off when no one is in the area.

D. Significant savings in electricity for lighting loads and for cooling loads can be achieved by replacing incandescent lamps with energy efficient fluorescent lamps, which are 4 times more effective.

E. Further savings can be achieved by retrofitting fluorescent fixtures with magnetic ballasts with electronic ballasts. Electronic ballasts experience half the power loss of magnetic ballasts, and increase lamp efficacy by approximately 10 to 15%.

F. Because of long-term deterioration of lighting equipment, a fixture older than 15 years should almost always be replaced rather than retrofitted.
III. Heating Ventilation and Air Conditioning (HVAC) Equipment

A. HVAC equipment can account for as much as 30% of an office’s energy consumption.

B. Program thermostats, for example, to turn on shortly before occupants arrive and to shut off shortly before they leave so the space is kept temperate only when fully occupied.

C. Further savings are possible by lowering the thermostat settings a few degrees during the heating season and raising thermostat settings during the cooling season. Reducing the heating temperature by 3 degrees Fahrenheit throughout the heating season can translate into as much as a 13% energy usage reduction.

D. Manage the building envelope by only letting in desired air and by keeping in the tempered air. Improving air sealing around windows, doors, elevator shafts and other openings can reduce the load on the HVAC system. Reduce exhaust fan usage using sensors or timers to ensure fans run only when needed.

E. Adjust vents to manage the flow of tempered air and increase occupant comfort. Extra heaters and fans in individual workspaces are a sign of a problematic ventilation system, and can use significant energy.

F. Careful maintenance improves efficiency, reduces waste, and lowers costs.
   1. Air conditioners, heat pumps, chillers and cooling towers all work by moving heat from one place to another. Heat transfer surfaces, such as cooling coils, condenser coils, heat exchangers and evaporator surfaces, should be clear of dirt, grease and other obstructions.
   2. Replacing air filters, cleaning intake screens, and periodically performing combustion efficiency testing and combustion rate adjustment for gas-fired heating equipment, will help the equipment operate more efficiently.

IV. Purchase of Renewable/Green Energy

A. To the extent possible, increase the amount of energy purchased that is provided from renewable or other “green” sources provided that it is cost effective and approved by operating entity management.

V. Leased Spaces

A. Most of our space is leased. For leased spaces encourage energy conservation, communicate efficiency best practices and attempt to influence landlord decisions in all leased space arrangements (i.e. set-back/programmable thermostats).

VI. Company Fleet

A. Encourage choices for company owned/leased business vehicles that are energy and cost efficient (but still safe and comfortable).
B. Consider, for example, programs that incent colleagues to select more “green” cars.

C. Consider (if applicable) a non-traditional approach to the selection of cars used by a department such as those for sales people.

D. Ensure that fleet vehicles are properly maintained.
   1. Properly maintained cars run more efficiently and have a lower carbon footprint.

VII. Business Travel

A. Reduce unnecessary business travel.

B. Consider methods such as virtual meetings with colleagues, clients, suppliers and others.

C. Promote choices for the most appropriate and “green” means for travel.
   1. Consider train vs. air, metro vs. taxi, etc.

D. Consider remote/virtual work options for colleagues and associates.

E. Promote the choice of fuel efficient rental cars to the extent possible.

F. Encourage proper maintenance of any personal cars used for business travel.
   1. Properly maintained cars are far more efficient and thus have a lower carbon footprint.

G. Promote use of more energy efficient “green” hotels.

VIII. Commuter Assistance

Consider establishing/expanding commuter assistance programs that promote:

• Biking, walking and using mass transit to get to work.

• Working from home.

• Car pools (preferred parking).

• Van pools (preferred parking).

• Use of hybrids (preferred parking).

Green Sourcing Guidance

• Consider the overall environmental life-cycle impact of all purchasing decisions, striving to source products with a low life-cycle impact.

• Consider the recycled content of materials purchased, including but not limited to paper products, office furnishings, flooring material and equipment.
• Review the possibilities for purchasing paper products that have been certified by either the Forest Stewardship Council (FSC) or the Sustainable Forestry Initiative (SFI) and that contain at least 30% post-consumer recycled fiber content. These are independent agencies which provide certification that the wood fibers used in the papermaking process come from sustainable sources.

• Consider evaluation our suppliers’ environmental performance and include this as one of our selection and assessment criteria. Establish a pilot project, focusing first on those suppliers that may have hazardous environmental or safety impacts.

• List the principal environmental impact for services or products purchased and ensure that our suppliers implement solutions to reduce their impact. E.g. use of biodegradable cleaning products, energy/carbon efficient office furnishings and fixtures.

• Consider sourcing from suppliers located near the point of delivery to ManpowerGroup, to the extent possible.

• Office Furniture, Carpeting and Fixtures: Source these materials in accordance with the Green Branch Guidance.

Office Safety Guidance

Employee Health and Safety

ManpowerGroup is committed to the highest standards of health and safety. In adopting these standards, we seek to create a workplace and work systems that enable all employees to feel safe and secure.

ManpowerGroup endeavors to take appropriate measures to provide a safe working environment for all staff personnel, temporary associates, contractors and consultants. We focus on compliance with health and safety legislation within our own business operations and also apply this same standard as a matter of priority when reviewing whether to place associates, contractors and consultants in a client’s work environment.

ManpowerGroup’s Employee Health and Safety Council (EHS Council) was formed in 2008 to establish and encourage improved safety at the company’s global, regional and country levels. The Council’s role has been redefined as part of our 2011 Environment, Health and Safety Management System (EMS). Council objectives include sharing and developing best practices and analysis. The Council considers issues such as the following: inventory of safety programs, EHS statistics and recommended improvements to reduce the number and severity of work-related injuries and illness. Results are to be reported to management and the board each year as part of the EMS and CSR overview.

The work of the Council is expected to contribute to overall Company objectives, including employee and associate well being, risk mitigation, cost efficiencies and improved Brand experience and reputation.
We have put processes in place and strive to adequately assess and control the health and safety risks arising from the company’s work activities. Adequate resources are made available to provide information, instruction, training and, where necessary, supervision, for all colleagues on an ongoing basis.

**Employee Health and Safety Council**

The Council expects to develop a systematic approach with an information gathering and monitoring capability for Employee Health and Safety (EHS) best practices and related issues in our major operations worldwide.

1. **EHS Council**
   The EHS Council is a network of individuals in ManpowerGroup operations worldwide who are responsible for facilitating compliance with local country occupational health and safety laws. This includes the sharing of best practices and contributing to business continuity planning initiatives, such as the development of action plans to mitigate the impact of flu viruses or other pandemics on the business. Council members also gather and maintain data such as injury logs when appropriate.

2. **EHS Corporate Council Coordinator**
   The EHS Corporate Council Coordinator facilitates meetings, conference calls and information gathering.

3. **Management**
   The Global Ethics Compliance Officer serves as the management lead.

4. **Senior Executive Sponsorship**
   The EVP for Strategy and Talent will report to the board audit committee from time to time as part of Enterprise Risk Management Program.

5. **Expected Outcomes**
   The role of the EHS Council continues to evolve. Following are some desired results:
   - Establish and encourage expectations related to employee health and safety at the company global, regional and country levels. Example: inventory of safety programs
   - Gather and report EHS statistics on an annual basis. Example: injuries and hours worked.
   - Reduce the number and severity of work-related injuries and illness.
   - Contribute to overall Company objectives such as employee and associate safety, risk mitigation, cost efficiencies, reputation and Brand Experience.

**Water Conservation Guidance**

1. **ManpowerGroup Guidance for Water Conservation**
   This applies to ManpowerGroup entities worldwide [in-scope]. It is the intent of this guidance to ensure that ManpowerGroup entities are striving to minimize water use where
practical. ManpowerGroup’s direct use of water is limited to domestic water for hygiene and drinking. Access to water is a major global issue. As such, ManpowerGroup’s guidance is intended to help generate improved awareness of this issue, a daily concern for much of the world’s people.

II. SCOPE

Each ManpowerGroup Entity shall develop and implement a water conservation program.

III. RESPONSIBILITIES

The ManpowerGroup EMS Steering Committee is responsible for addressing this guidance, seeking data and preparing a consolidated report.

IV. DEFINITIONS

Water Conservation: striving to minimize the amount of water used. Gray Water: Wastewater that has been treated, but not to such a degree that is acceptable to use as drinking water. Gray water is often reused on-site for practices such as watering lawns.

V. GENERAL REQUIREMENTS

Each entity shall consider an appropriate water conservation program that includes the following program elements:

A. General Water Conservation Program Elements

1. Proper installation and maintenance of drinking water systems and monitoring of the quality of water delivered to its employees. Independent monitoring is not required if drinking water is provided and monitored by a responsible municipal or government authority. (This generally includes all water distribution systems in the developed world.) Consider how internal process modifications are handled with regards to their impact on water use.

B. Water Conservation Program

1. All new ManpowerGroup entities and major renovations to existing ManpowerGroup entities shall incorporate water conservation technologies, wherever practical. This shall include striving to minimize the amount of water used and looking at implementing water reuse (e.g. using gray water for the watering of lawns) or water recycling opportunities where practical.

2. Existing ManpowerGroup entities shall attempt to accurately determine their water use and implement water conservation and water reuse (e.g. using gray water for watering of lawns) wherever practical. When possible, the annual GRI reporting process will be used to determine the effectiveness of water conservation programs within in scope entities.
3. Qualitative and (to the extent possible) quantitative water conservation goals will be set as part of ManpowerGroup’s EMS efforts. The consolidated goals will be established by the Steering Committee in conjunction with our entities worldwide. The goals will apply at a corporate and business entity level. ManpowerGroup’s goal is to minimize water use as much as possible.

4. ManpowerGroup entities shall use the EMS database application to track water data, to the extent possible, on a regular schedule.

**Water Management – Program Tools**

I. Water Conservation

- Determine the largest uses of water at each in scope entity to the extent possible, through data derived from direct metering or estimates.
- Encourage the use of low-flow toilets.
- Consider infrared sensor-activated water faucets.
- Repair dripping faucets, showers and continuously running or leaking toilets.
- Install faucet aerators and low-flow shower heads (where applicable).
- Maintain appliances and water piping if applicable.
- As appliances or fixtures wear out, consider replacing them with water-saving models.
- Consider more effective cleaning processes such as carpet cleaning with a dry system, rather than steam cleaning.

II. Cafeteria

- Turn dishwasher off when not in use. Wash full loads only.
- Use water from steam tables to wash down cooking area.
- Do not use running water to melt ice or frozen foods.
- Use water-conserving ice makers.

III. Lawn and Plant Irrigation

- Water landscapes only when needed. Water in the early morning or evening.
- Prevent waste from water running into the streets or alleys.
- Dry sweep surfaces instead of hosing down sidewalks, driveways, and parking lots.
- Use time controllers on sprinkler systems.
- Evaluate and determine if “gray water” (or collected rain water) can be re-used for on-site irrigation purposes.
- Do not water on windy days.
Communications and Culture – Program Tools

I. Communications is a key component of enhancing the sustainability culture among ManpowerGroup’s employees. Business operating entities, regional and global staff have a variety of tools for effective messaging in a consistent manner. Our audiences are both internal and external:

A. Internal Audiences:
   1. Employees/Colleagues
   2. Management
   3. Board of Directors

B. External Audiences:
   1. Clients
   2. Candidates
   3. Suppliers
   4. Shareholders
   5. Media
   6. Communities
   7. Non-Governmental Organizations (NGOs)
   8. Socially Responsible Investors (the SRI community)

C. Communication Vehicles that Can be Employed
   1. The Buzz
   2. All Colleagues Landing Page
   3. Code of Business Conduct and Ethics
   4. JustMeans
   5. Entity Intranets and newsletters
   6. Cognis (information and best practice sharing)
   7. Enablon application
   8. ManpowerGroup.com/Social/EMS
   9. Business Unit/Country Intranets, CSR/Sustainability tab
10. CEO Messages and Speeches
   a. And Other Executives and Middle Managers

11. Orientation/on-boarding materials/process

12. Department/Team Meetings

13. Company Web Site (Internet – Public)

14. CSR/SR Annual Report (GRI)

15. ManpowerGroup Annual Report

16. Responses to the SRI Community

17. Site-based Sustainability/EMS/Green teams

18. Best Practice Sharing among entities/business units
   a. Cognis
   b. Quarterly conference calls/web-exes

19. Poster and video displays in common employee areas
   a. Cafeterias
   b. Main and colleague entrances

20. Earth Day (April 22nd) Awareness Events
   a. Also a great day to launch new initiatives

II. Enhancing our culture of social responsibility and sustainability is extremely important for ManpowerGroup’s EMS efforts to succeed. Our colleagues must be informed of ManpowerGroup’s efforts and given the opportunity to feel empowered to get involved with that effort and feel accountable for our success in this area.

A. Business entities can leverage personal creativity and involvement, to the extent possible, to improve our EMS performance and help ManpowerGroup through:

1. Site based EMS Committees and sub-teams involving as many aspects of the entity as practical (entity/local “green teams.”)

2. Leveraging existing efficiency efforts since good EMS practices; sustainability and efficiency are allies.

3. Providing awareness training and informal opportunities for our colleagues.

4. Creating a lending library of books and other materials on these topics and making them available for everyone.
5. Prominently displaying information on the sustainability efforts in public areas such as the cafeteria or main entrance.

6. Creating displays that drive home the sustainability message such as a display in the café showing one reusable mug and 500 Styrofoam cups (what the average person uses in a work year.)

7. Encouraging everyone to find ways to “de-materialize” routine business transactions—remove paper and energy—to the extent possible (e.g. replace with electronic time reporting, invoicing, direct-deposit payments and investor information).

8. Providing opportunities to improve the internal and external environment to the extent possible with ideas such as plants in office, tree planting programs and involvement with park or other community clean-up programs.)
Appendix
Appendix A: Annual EMS Self-Assessment Questionnaire

ManpowerGroup’s annual entity self-assessment questionnaire will be developed in 2012 and will eventually be collected via our EMS data management system.
Appendix B: Definitions

- **Awareness Training** – Training that ensures that all ManpowerGroup personnel are familiar with the EMS and the company’s EMS goals.

- **Competency Training** – Training which addresses EMS programs and procedures that are specific to personnel work activities – such as maintenance, sourcing, “green cleaning” or “green dining” and even basic activities like how to perform double-sided printing.

- **Corporate EMS Steering Committee** - Responsible for establishing the company’s worldwide sustainability strategy, the EMS requirements, and for monitoring implementation especially through reporting and analysis. The committee is chaired by the Corporate Director of Corporate Social Responsibility.

- **CSR** – Corporate Social Responsibility

- **Days Away/Restricted Case Rate** – Calculated using the number of cases or days lost/restricted divided by the total number hours worked by all employees in one period of time. Often this is reported per 200,000 hours or more.

- **EHS** – Environment, Health and Safety components of the EMS

- **EMS Database (or Application)** – Environment, Health and Safety Management Information System; a database or software application to collect, manage and analyze metrics and other information related to EMS.

- **EMS** – Environment, Health and Safety Management System; designed to determine, measure and improve our EMS performance by reducing our impacts on the natural environment and creating safer work environments for our colleagues. The EMS is a tool to develop guidance, policies, practices, and procedures in a systematic manner to develop and assess goals, outcomes and expected improvements and report to stakeholders. Our definition of EMS includes Health and Safety

- **EMS Self-Assessments** – To be conducted annually by the entities. The results will be reported annually via the database and reviewed by the Corporate EMS Steering Committee. Where follow-up is required, or resources needed, the Corporate EMS Steering Committee has a responsibility for verifying that the affected entity has taken appropriate action to ensure that any discrepancies or concerns are addressed in a prompt manner. (The Entity General Manager has the direct responsibility for ensuring that appropriate resources are available to implement any corrective actions.) All discrepancies or concerns can be tracked to closure using the action item tracking function in the database.

- **EMS Reviews** – On-site EMS compliance reviews conducted on a rolling basis. These methods for these reviews will be determined in 2012 and 2013. They may be conducted by external qualified professional EMS reviewers and/or by internal ManpowerGroup staff in order to promote “knowledge transfer.” Any identified “corrective actions” or “action items” from these on-site reviews shall be tracked to closure using the action item tracking function.
in the EMS database. ManpowerGroup will also collect “best practices” from these reviews and will share them via the most contemporary means (currently Cognis, All Colleagues Landing Page, the Internet and intranets. The Steering Committee will also cover these topics as part of a standing meeting scheduled quarterly.

- **Energy Reviews** – The primary driver for the energy assessments, to be implemented in 2013, will be energy conservation, not compliance. These reviews will determine cost effective opportunities to reduce energy usage and drive down carbon emissions. The energy reviews will be implemented with a reasonable cycle and during remodeling or new construction.

- **Entity** – ManpowerGroup subsidiary or business operating unit

- **Entity EMS Committee** – Has responsibility for implementing the EMS and for driving EMS performance at the entity level.

- **Environmental Aspect** – An element of an organization’s activities, products or services that can interact with the environment

- **Environmental Impact** – Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization’s activities, products or services.

- **Gray Water** – Wastewater that has been treated, but not to such a degree that is acceptable to use as drinking water. Gray water is often reused on-site for practices such as watering lawns.

- **In-Scope** – Entities that are subject to the EMS. This EMS currently provides a mechanism for EMS management for the largest ManpowerGroup entities that account for 90% of ManpowerGroup’s revenues and world and regional headquarters.

- **ISO 14001:2004** – Specifies requirements for an environmental management system to enable an organization to develop and implement a policy and objectives which take into account legal requirements and other requirements to which the organization subscribes, and information about significant environmental aspects. It applies to those environmental aspects that the organization identifies as those which it can control and those which it can influence. It does not itself state specific environmental performance criteria.

- **KPI** – Key Performance Indicator

- **Management System** – The framework of processes and procedures used to ensure that an organization can fulfill all tasks required to achieve its objectives

- **Total Recordable Incident Rate** – The number of work-related recordable injuries and illnesses per 100 workers over a year’s time. Or this can be the total number of work-related injuries or illness divided by the total number of hours worked (and often reported per 200,000 hours.

- **Water Conservation** – The practice of striving to minimize the amount of water used.
Appendix C: Green Branch Experience Standards

Branch Experience, a Green Initiative

At ManpowerGroup, we care about the environment and aspire to be good stewards of resources and thought leaders in the contemporary world of work. The processes and materials used in our offices can add to the experience, and further emphasize ManpowerGroup’s commitment to Corporate Social Responsibility. Therefore, the Global Look and Feel Team and Global Strategic Sourcing Team have worked together to incorporate vendors and product specifications in a program called the Global Branch Green Experience.

This program includes refurbishing approximately 3,500 branch locations around the world in the next 5-7 years in an effort to create one global brand. The new specifications and vendors meet some of the highest currently established environmental standards.

Branch Experience Global Environmental Stewardship includes the following standard elements:

1. Modular carpet flooring
2. Low VOC paint
3. Energy efficient lighting (in development)

Modular Carpet Flooring

InterfaceFLOR Modular Carpet:

InterfaceFLOR (NASDAQ IFSIA) is the worldwide leader in design, production and sales of environmentally-responsible modular carpet for commercial applications. Carpet is critical to the consistent Look and Feel of the Manpower branch network. The InterfaceFLOR carpet colors have been selected to match other Key Design Elements such as the “Work of Art” mural, furniture fabrics and paint. The selected products are manufactured and stocked in the US, UK and Thailand, and InterfaceFLOR has representation in 110 countries to provide local assistance where needed. All manufacturing facilities are certified under International Standards Organization (ISO) Standard No. 14001.

Manpower Program and Product Data:

To build a sustainable and consistent program around carpet, Manpower has worked with InterfaceFLOR to provide global product specification, pricing, inventory and service in every country in which Manpower operates. Each country is required to procure modular InterfaceFLOR carpet for the Branch Experience through a fixed ordering process outlined in the Global Look and Feel Guidelines.

This approach allows Manpower to not only control the exact brand and color but more importantly fulfills a corporate commitment to use InterfaceFLOR carpet that meet the highest local environmental standards today and in the future when new products become available.
The specified InterfaceFLOR carpet has the same product names globally - Furrows Wheat and Tatami Kuji - and the size of the carpet tiles are 50 CM square. All are intended to give the best performance with the best “sustainability factor”. Regional manufacturing and purchasing avoids additional shipping and associated negative environmental impact.

Each branch office requires on average 130 square yards (108 square meters) of carpet, providing a significant impact on the environment when multiplying this across the approximately 300 projects each year, totaling about 39,000 SY or 32,500 M2.

Therefore some of the most sustainable products available have been specified in the Manpower program: Furrows II and Tatami are made from 50% recycled content. (48% post-industrial recycled content and 2% post-consumer recycled content).

**InterfaceFLOR Green Initiatives:**

InterfaceFLOR presents quantitative data each year to support their sustainability and corporate responsibility claims. They are rated as No. 1 on the 2009 GlobeScan Sustainability Survey and InterfaceFLOR believes sustainability goes beyond low VOC or recycled content products.

In the mid-1990s, InterfaceFLOR redirected its industrial practices to include a focus on sustainability without sacrificing its business goals. This led to Interface’s singular environmental guiding principle—Mission Zero. Mission Zero is the promise to eliminate any negative impact Interface has on the environment by 2020, which translates to zero waste and zero carbon emissions by 2020.

Achieving Mission Zero means ensuring that the processes used to create products, install them and reclaim them at the end of their useful life are just as environmentally-friendly as the product itself: Use Less Energy + Use Less Material + Make it Last + Turn Backing into Backing + Turn Fiber into Fiber = Mission Zero.

Mission Zero has led to the following sustainability metrics:

- 3.2 million kg — about 600 African elephants — of raw materials were recycled for reuse last year
- 4.4 million kg of waste — which equates to 45 blue whales — was sent to energy recovery
- 28% increase in green energy used from renewable resources since 1996
- 77% reduction of waste sent to landfills from 6.8 million kg in 1996
- Net greenhouse gas emissions were down 44% since 1996
- Modular carpet manufacturing saw an 80% decrease in water intake since 1996
- 43% decrease in total energy use since 1996
InterfaceFLOR Product Benefits:

InterfaceFLOR modular carpet is engineered to provide durability and flexibility, reducing environmental impact even further:

- InterfaceFLOR tiles with their patented backing constructions stay on the floor with no up curling, no tapping and no rippling effect, yet are easy to selectively replace.
- InterfaceFLOR tiles use Premium Branded solution dyed nylon fibers which provides color consistency and protection again soiling and stains.
- Modular carpet is easier to handle, install and maintain then roll carpet.
- Modular carpet has less waste than roll carpet saving time and money.
- InterfaceFLOR tiles are low VOC.
- InterfaceFLOR tiles can be installed without glue using their TacTiles.
- InterfaceFLOR can recycle carpet tiles into new fiber and backing through their ReEntry 2.0 program

Low VOC Paint

AkzoNobel Paints:

Paint is critical to the consistent Look and Feel of the Manpower branch network. The colors have been selected to match other Key Design Elements such as the “Work of Art” mural, furniture fabrics and flooring products.

Each branch office requires on average 30 gallons (115 Liters) of paint, providing a significant impact on the environment when multiplying this across the approximately 300 projects each year, totaling about 9,000 gallons or 35,000 liters.

To build a sustainable program around these paint needs, Manpower has worked with AkzoNobel, one of the world’s largest providers of paint. Although there is no formal global purchasing and pricing agreement between AkzoNobel and Manpower, every country in which Manpower operates is required to procure paint for the Branch Experience through a fixed ordering process outlined in the Global Look and Feel Guidelines.

This approach allows Manpower to not only control the exact brand and color but more importantly fulfills a corporate commitment to use paints that meet the highest local environmental standards today and in the future when new products become available. The specified paint has different brand names and slightly different characteristics in the different regions. All are intended to give the best performance with the best “sustainability factor.” Local mixing and purchasing avoids additional shipping and associated negative environmental impact.

AkzoNobel presents quantitative data each year to support their sustainability and corporate responsibility claims. They are rated as No. 2 on the Dow Jones Sustainability Index AkzoNobel
believes sustainability goes beyond low VOC. It is essential to assess paint’s environmental impact over its entire life cycle, from cradle to grave, as well as over the lifetime of the building in which it is used.

There are three questions to answer to determine the overall environmental impact of paint. ManpowerGroup aims to address all of these.

1. How much paint do we need?

   Using a product with higher hiding power will mean applying fewer coats, therefore lowering the environmental impact of the job.

2. How long will it last?

   Using a product with higher durability will extend the maintenance cycle, meaning less coats of paint need to be applied over time, again lowering the environmental impact.

3. What’s in it?

   Using a product that has been engineered to have a lower environmental impact by lowering the VOC content, by reducing hazardous chemical content or even using more environmentally efficient manufacturing or transportation processes can help ensure a lower environmental footprint.

In terms of product specifics:

<table>
<thead>
<tr>
<th>Wall/Ceiling</th>
<th>Sustainability Brand</th>
<th>Local Product Brand</th>
<th>Key Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>N America</td>
<td>Think Impact</td>
<td>Lifemaster No VOC Eggshell 9300 Series</td>
<td>No VOC</td>
</tr>
<tr>
<td>Europe Dulux</td>
<td>Ecosure</td>
<td>EcosureQuick Drying Eggshell</td>
<td>10% less embodied carbon and minimum 20% lower VOC content</td>
</tr>
<tr>
<td>Europe Sikkens</td>
<td>Ecosure</td>
<td>Alphatex SF</td>
<td>No VOC</td>
</tr>
</tbody>
</table>
The specified Alphatex SF wall paint is water based and VOC free. This means that it dries quickly and is low in odor.

Rubbol BL Rezisto is a water-based, human grease resistant lacquer system. In essence, this means longer renovation intervals as surfaces don’t get marred as easily and also yellowing is avoided.

In addition to the products, AkzoNobel provides services to reduce environmental impact. Some examples are:

1. Can Recycling Service
2. Environmental Washing System for application equipment
3. Paint Solidifier Guide to reduce liquid paint disposal
4. Think Impact Product Guide for all their ranges
Appendix D: Master Document List

To be developed by the Corporate EMS Steering Committee and the Entity EMS Committees.

Note: This list will be maintained at the corporate level by the Corporate EMS Steering Committee and at the entity level (covering their site specific documentation) by their EMS Committees.

It is anticipated that these lists will indicate document:

- ID #
- Title
- Date
- Location
- Authorized By
- Scheduled Revision Date

And will include documents such as:

- EMS Policies
- EMS Manual
- EMS Database
- EMS Procedures and Work Practices
- EMS Aspects and Impacts
- EMS Objectives and Targets
- EMS Regulatory Compliance Review Procedures
- Non-Conformance, Corrective and Preventive Action Procedures
- EMS Review Procedures
- Emergency Preparedness and Response Procedures
- List of EMS Regulations and Other Legal Requirements
- EMS Review Procedure for Capital Projects
- Regulatory Agency Approvals and Permits
- EMS Communication Plans
- EMS Training Records
- Monitoring and Measurement Procedures