Why This Matters

Trust and transparency in the workplace have moved from aspiration to expectation almost overnight. And as technology continues to disrupt, unprecedented access to data and information brings increasing ethical challenges for organizations to manage.

After more than a decade of talent shortages\(^1\), even in the COVID-19 era skilled talent is in high demand and there are more options than ever for people with sought-after skills. A purpose-driven, ethical culture is a key differentiator for employers to attract the best talent.

At the same time, being recognized as a leader in ethical business practices has a direct impact on company value with reputation now responsible for an average of 38% of market capitalization\(^2\). High ethical standards are a differentiator for clients and customers too – in a world of complex global supply chains, transparency has become an expectation of doing business.

As a company whose purpose is to connect people with meaningful and sustainable work, we understand the importance of trust and transparency. We are proud to set a high standard for our industry. In 2020, we were recognized by Ethisphere as a World’s Most Ethical Company for the 11th time — the only company in our industry to earn this distinction. Our extensive global reach – working across more than 75 countries with hundreds of thousands of employers — gives us the opportunity to promote and advocate for the highest ethical standards for business conduct and responsible employment across regions and industries around the world.

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2. The 2018 UK Reputation Dividend Report
Proud of Our Progress: Where We Are Today

SETTING THE TONE
Our strong and comprehensive global Code of Business Conduct and Ethics ("Code") sets the tone for everyone we work with, from internal staff to suppliers and partners. Given our global footprint, the Code is available in over 20 languages, making it accessible to all employees and stakeholders around the world.

REGULAR, REALISTIC AND RELEVANT TRAINING
All our employees regularly train on our Code and other issue-specific policies, including anti-corruption, fair competition, information security and data privacy. We focus on ensuring training is understandable, realistic and relevant to the situations people face every day. In 2019, we enhanced mobile access to policies and training, making it even easier for our people to stay current with our standards.

UP TO DATE WITH THE LATEST REGULATIONS
We regularly refresh training to address emerging risks or changes in regulations. For example, we enhanced our data protection, privacy and cyber security training in anticipation of the General Data Protection Regulation, educating and empowering every individual to take responsibility for information security and privacy. We reinforce data privacy and cyber-security training through frequent campaigns and executive messaging at company-wide virtual townhall meetings.

OPEN DOOR POLICY
We reinforce and promote our culture of ethical behavior by fostering a work environment that encourages colleagues and associates to raise ethical concerns without fear of retaliation. Our Global Ethics Hotline is available anytime from anywhere, for anyone to report issues or seek guidance. We also encourage our people to bring concerns directly to their managers, and we train managers on creating work environments that help people feel safe in reporting their concerns.

ANNUAL ETHICAL HEALTH CHECK
The ManpowerGroup Annual People Survey (MAPS) gives us an annual ethical health-check. Employees are asked if they trust the organization to treat them fairly, if they feel people are treated with respect and if the guidelines on ethical practices are clear to them. We also source feedback on tone from the top and the example set by management, whether they know how to report ethical concerns, and if they feel they can do this without fear of retaliation. These questions are among the highest scoring on the survey, confirming that we are succeeding in creating a trusted and ethical culture. MAPS results are reported to our Board of Directors, and we ensure every team receives their results while managers are held accountable to address any concerns.

CULTURE AUDIT: A DEEP-DIVE ANALYSIS
In 2018, we conducted our first culture audit, analyzing three years of MAPS results in relation to the company’s four culture enablers: Collaborative, Fast & Agile, Trusted & Ethical, and Performance-Based. The audit, which included a deep-dive analysis of seven of our largest country operations, showed all culture enablers were consistently positive throughout the assessment period. We will continue to use these types of audits to assess the health of our organization and the effectiveness of our leadership in reinforcing our commitment to ethical practices.

ADVOCATING ETHICS ON THE GLOBAL STAGE
Through our leadership activity with the World Employment Confederation we continually advocate the role that our industry plays in promoting fair recruitment practices and upholding high standards for employment.

Our strategic partnership with the World Economic Forum also enables us to elevate the conversation about ethical, responsible and sustainable work to a world stage alongside other leaders and decision makers outside our organization and beyond our industry.

Over the last few years, our leaders have promoted ethics and integrity in a variety of forums, including Ethisphere’s Global Ethics Summit, the ILO/UN Conference on Trade and Development, the G100 Economic Consensus Meeting, the World Employment Conference on Labour Dynamics in the Digital Age, Tripartite Alliance for Fair & Progressive Employment Practices Conference, the MIT Initiative on the Digital Economy, the National Association of Corporate Directors Global Leaders Summit and the World Economic Forum Sustainable Development Impact Summit.
Ambitious for Improvement: What Next

As we continue to diversify and grow our business, we recognize the importance of transparent sharing of our ethical expectations both within our organization and with our business partners. We are expanding the reach of our Supplier Code of Conduct and developing a framework for third-party relationships that positions our standards for ethical and responsible business practices.

We believe it is important to anticipate not just regulatory measures but also public expectations and to lead best practice accordingly. As digital transformation continues across all sectors we can expect more regulation that will define who owns data—likely in favor of individuals.

Over the past two years we have reinvested to refresh our approach to company-wide training and communications, enabling us to quickly integrate additional growing priorities like cyber security. We are committed to building the skills of our people, empowering them with real-life knowledge and creating a culture of continuous learning so we can anticipate and quickly adapt to evolving stakeholder expectations.

**ETHICS PERFORMANCE INDICATORS**

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<tr>
<th></th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
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</thead>
<tbody>
<tr>
<td>Employees trained on ethics policies¹</td>
<td>99%</td>
<td>99%</td>
<td>99%</td>
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<tr>
<td>Trusted and Ethical Culture score²</td>
<td>79%</td>
<td>79%</td>
<td>80%</td>
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<tr>
<td>Countries assessed by EcoVadis</td>
<td>13</td>
<td>20</td>
<td>22</td>
</tr>
<tr>
<td>Countries rated Gold or Silver for ethics by EcoVadis</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
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**NOTE ON PERFORMANCE DATA**

¹ All employees are required to complete annual training on the ManpowerGroup Code of Business Conduct and Ethics, Anti-Corruption Policy, and information security and data privacy standards. Given employee turnover, we expect at least 95% completion rate.

² Percentage of employees answered favorably to all Trusted & Ethical Culture indicators on the ManpowerGroup Annual People Survey.