



**Speak
Up!**

Policy

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Statement

At PageGroup, we are committed to conducting business with high standards of professionalism and integrity. It is important to PageGroup that any wrongdoing in relation with PageGroup activities is reported and dealt with properly.

Purpose and Scope

Purpose

The purpose of this Speak Up Policy is to encourage and enable individuals to raise concerns regarding unethical, illegal, or unsafe activities within PageGroup. This policy aims to:

- Encourage individuals to report any genuine concerns about wrongdoing as soon as possible.
- Provide guidance on how to report any wrongdoing and how such concerns will be dealt with.
- Demonstrate that PageGroup is serious about addressing any genuine concerns about wrongdoing and that it will support any individuals who raise such concerns within the terms of this policy.
- Make it clear that PageGroup will not tolerate any form of retaliation against anyone who raises genuine concerns about wrongdoing in accordance with this policy, even if it turns out that those concerns are misplaced.

This policy does not intend to prevent anyone from reporting to a relevant regulatory or law enforcement authority, nor does it absolve anyone of any obligation to make such a report when required.

Scope

The policy applies to all employees, trainees, interns, shareholders, executives, and volunteers worldwide. It also applies to job applicants, self-employed individuals, contractors, suppliers, and any other third parties working with or for PageGroup in Continental Europe. It covers concerns related to:

- Criminal activity.
- Breach of any legal obligation.
- Danger to health and safety, including but not limited to discrimination, workplace bullying and sexual harassment.
- Damage to the environment.
- Miscarriages of justice.
- Bribery.
- The deliberate concealment of any of the above.

This Speak Up policy is a group-wide policy and is intended to be applicable to the group's worldwide operations. However, the policy acknowledges that local regulations might require alternative procedures – in which case, country-level variances will be included in an appendix of this policy and in a country-specific policy which will take precedence over this policy.

This policy does not cover personal grievances related to individual employment matters, which should be handled by the People and Culture Team, neither is it intended for complaints about the service clients have received or commercial disputes unless they fall into the definition of wrongdoing as seen above.

How to Speak Up

Employees

Employees should normally raise any concerns about wrongdoing at work with their line manager and/or People and Culture team in the first instance. If they do not feel confident about doing so (for example, because they believe their line manager may be involved) or where concerns have been raised, but they do not believe they have been addressed, they should use the Speak Up channel.

The Speak Up channel is operated by a neutral third party, guaranteeing confidentiality of reports, and is available [here](#).

Raising a genuine concern will protect the employee against retaliation or other less favorable treatment as a result of that disclosure, should they disclose their identity when raising a concern. However, it does not provide the employee with any right to any (or any minimum level of) involvement in the resulting investigation nor to dictate any particular remedy or response, whether or not the concern is found to be genuine.

Any employee who is not satisfied with the outcome of the concern may contact their People and Culture team, the Designated officer or the Chief Executive Officer.

If an employee raises or repeats a concern which they know is false, they may be subject to disciplinary action, up to and including dismissal.

External Stakeholders (continental Europe only)

As previously stated, this policy extends in Continental Europe to individuals outside of PageGroup, including applicants, suppliers, contractors, and other third parties. If an external third party has concerns regarding illegal,

unethical, or unsafe practices associated with PageGroup, they are encouraged to report them through the Speak Up channel, operated by a neutral third party, available [here](#).

All reports will be treated with the same level of seriousness and confidentiality as internal reports. PageGroup is committed to investigating any external concerns thoroughly and addressing them in a timely and appropriate manner.

While we encourage individuals to report concerns internally through our whistleblowing channels so we can address them promptly and appropriately, we recognize that individuals may choose to report directly to external regulatory or law enforcement authorities. This is a legal right and may be exercised at any time, in accordance with applicable laws.

Investigation

We are committed to acknowledging receipt of whistleblowing reports within seven (7) calendar days of receiving them, thus confirming concerns have been received and will be reviewed in accordance with our investigation procedures.

Depending on the nature of the concerns raised, PageGroup may appoint an investigator or team of investigators to investigate the concerns. PageGroup will aim to keep the reporter, should they have raised the concern in their own name or have provided their contact information to the third party operating the SpeakUp channel, reasonably informed of the progress of any investigation and the final outcome. While PageGroup will give as much feedback as it properly can, due to the legal obligations of confidentiality it owes to its employees, it will not usually be possible for PageGroup to provide feedback on the detailed outcome of any disciplinary action taken against an employee or where PageGroup's response may be commercially sensitive. Any information about the investigation should be treated as confidential.

In line with our commitment to dealing with reports in an appropriate and timely manner, we aim to complete the investigation and provide an update to the whistleblower regarding the actions taken, the status of the investigation, and its outcome, bar any confidential information we might not be at liberty to disclose, within ninety (90) calendar days of receiving the report.

Protection

Retaliation or adverse action against individual who Speak Up and raise a concern is strictly prohibited, and the organization will take necessary steps to protect individuals who come forward.

If an employee believes they are being victimized or have suffered detrimental treatment for having raised genuine concerns about wrongdoing at work in accordance with this policy, they should talk to their People and Culture Team or the Designated Officer. They should identify the concern raised and how it was raised, and the specifics of the treatment which they believe has resulted from their doing so.

PageGroup will take all complaints seriously and seek to deal with them promptly. If the complaint is upheld, then the employee will be notified. The details of any action taken against the perpetrator as a result are usually confidential between them and PageGroup.

Communication and Training

PageGroup will regularly communicate the Speak Up policy to all employees and provide training on its contents, ensuring everyone understands their rights and responsibilities.

Additionally, PageGroup will make the Speak Up policy available to external stakeholders on its website.

Responsibility for the Policy

The CEO has overall responsibility for this policy and the Designated Officer has day-to-day responsibility for it. This policy will be reviewed periodically.

Designated Officer:

Stéphanie Lecerf, Managing Director Global Employee Relations – stephanielecerf@michaelpage.fr

Appendix – Country-level Deviations from the Policy

Foreword

This document outlines the deviations from the Policy, which are due to local laws. It is important to review the Policy alongside the national laws that apply to local situations.

If there is any inconsistency between the Policy and these Country-Level Deviations, the Country-Level Deviations will take precedence.

Currently, there are country-level deviations for these countries:

- **Asia-Pacific: Australia, Japan, Malaysia.**
- **Europe: Austria, Belgium, Czech Republic, France, Germany, Hungary, Ireland, Italy, Luxembourg, Netherlands, Poland, Portugal, Romania, Slovakia, Spain, United Kingdom.**
- **Latin America: Argentina, Brazil, Chile, Colombia, Mexico, Panama, Peru.**
- **Middle East-Africa: Mauritius, South Africa, United Arab Emirates.**
- **North America: Canada, United States of America.**

Country-level Deviations

Asia-Pacific

Australia

- Category of authorized reporters¹: employees, trainees and interns.

Japan

- Category of authorized reporters: employees, trainees, interns, shareholders, company officers and contractors.
- Investigation of concern window: 20 days.

Malaysia

- Category of authorized reporters: employees, trainees, interns, volunteers, job applicants, self-employed individuals, shareholders, company officers, contractors, suppliers and “those who have a connection with the informant” (Section 7(3) Whistleblowers Protection Act of 2010).

¹ By law, reporters need to fall in one of several identified categories of reporters if applicable

Europe

European Union

- Within the European Union, the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law details the category of concerns as follows:
 - **Public Health and Safety:** Public health, Food safety, Consumer protection, Product safety and compliance, Transport safety
 - **Environmental & Animal Protections:** Protection of the environment, Radiation protection and nuclear safety, Feed safety, animal health and welfare
 - **Data Privacy:** Protection of privacy and personal data, Security of network and information systems
 - **Finance:** EU Markets, Public/governmental procurement, Financial services, products and markets, Prevention of money laundering and terrorist financing
 - **EU Markets:** Breaches affecting the financial interests of the EU, Breaches relating to the EU internal market

Austria

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, interns, volunteers, job applicants, self-employed individuals, shareholders, company officers and relatives.

Belgium

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, self-employed individuals, shareholders, and suppliers.
- Anonymous reporting: allowed for companies of 250 employees or more.

Czech Republic

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, interns, volunteers, job applicants, self-employed individuals, shareholders, and company officers.
- Anonymous reporting: not allowed.
- Investigation of concern window: 30 days.

France

- Reporting categories: see above, and according to the provisions of the law of 9 December 2016 known as the Sapin II Act: information relating to a crime, offense, threat, or harm to the public interest, a violation, or an attempt to conceal a violation. Category of authorized reporters: former and current employees, trainees, interns, volunteers, job applicants, external and occasional collaborators, shareholders, company officers, co-contractors, their subcontractors or, in the case of legal entities, the members of the administrative, management, or supervisory bodies of these co-contractors and subcontractors, as well as their staff members.

Germany

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, interns, volunteers, job applicants, self-employed individuals, shareholders, company officers, contractors, and suppliers.

Hungary

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, interns, volunteers, job applicants, self-employed individuals, shareholders, company officers, contractors, suppliers and relatives.
- Anonymous reporting: not allowed.

Ireland

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, interns, volunteers, job applicants, self-employed individuals, shareholders, and company officers.
- Anonymous reporting: allowed though the employer will not be obligated to accept and follow up on anonymous reports.

Italy

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, interns, volunteers, self-employed individuals, shareholders, and company officers.

Luxembourg

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, interns, volunteers, self-employed individuals, shareholders, company officers, contractors, suppliers, and relatives.

Netherlands

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, interns, volunteers, job applicants, self-employed individuals, shareholders, company officers, contractors, and suppliers.

Poland

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, interns, volunteers, job applicants, self-employed individuals, shareholders, company officers, contractors, and suppliers.
- Anonymous reporting: allowed though the employer will not be obligated to accept and follow up on anonymous reports.

Portugal

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, interns, volunteers, shareholders, company officers, contractors, and suppliers.

Romania

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, interns, volunteers, job applicants, self-employed individuals, shareholders, company officers, contractors, and suppliers.
- Anonymous reporting: allowed provided the whistleblower provides sufficient information. Otherwise, the report could be dismissed within a 15-day period.

Slovakia

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, interns, volunteers, job applicants, self-employed individuals, shareholders, and company officers.

Spain

- Reporting categories: see above.
- Category of authorized reporters: employees, trainees, interns, volunteers, job applicants, self-employed individuals, shareholders, company officers, contractors, and suppliers.

United Kingdom

- Reporting categories: Corruption and bribery; fraud; data protection; environmental violation; health and safety risks, criminal offences, and any other matters that are in the public interest.
- Category of authorized reporters: employees; workers, agency workers, and contractors.
- Anonymous reporting: allowed, though individuals are encouraged to provide contact details to enable effective follow-up and investigation.
- Investigation of concern window: N/A, but all concerns should be acknowledged promptly and investigated as quickly and thoroughly as possible in line with internal procedures.

Latin America

Argentina, Brazil, Chile, Colombia, Mexico, Panama, Peru,

- Reporting categories: corruption and bribery, violations of anti-corruption laws, personal data protection, public ethics and conflicts of interest, labor violations and administrative infractions.
- Category of authorized reporters: employees, trainees, interns, volunteers, job applicants, self-employed individuals, shareholders, company officers, contractors, and suppliers.

Middle East and Africa

Mauritius

- Reporting categories: corruption and bribery, fraud, data protection breaches; abuse of authority, breaches of law, environmental violations and human rights abuses.
- Category of authorized reporters: employees and any person (including third parties).

South Africa

- Reporting categories: corruption and bribery, fraud, human rights violation, environmental violations.
- Category of authorized reporters: employees, contractors, suppliers, and other stakeholders.
- Investigation of concern window: N/A, but procedural fairness and prompt handling are expected.

United Arab Emirates

- Reporting categories: corruption and bribery, fraud, human rights violation, abuse of power, financial misconduct, and violations of internal policies or local laws.
- Category of authorized reporters: employees; some sectors (e.g. financial or free zones like DIFC/ADGM) allow third-party disclosures.

North America

Canada

- Reporting categories: Breaches of any federal or provincial law or regulation, corruption and bribery, fraud, data protection, environmental violations, health and safety violations.
- Category of authorized reporters: employees.

United States of America

- Reporting categories: Violations of federal/state law, securities fraud, accounting malpractice, workplace discrimination/harassment, health and safety risks, and whistleblower retaliation. corruption and bribery, data protection, environmental violations.
- Category of authorized reporters: employees, contractors, former employees, and others (e.g. under Sarbanes-Oxley, Dodd-Frank, and state laws).