

randstad group procedure

任仕达集团程序

misconduct reporting
procedure.

不当行为报告程序



randstad

misconduct reporting procedure - china.

不当行为报告程序。

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1. purpose and scope 目的和范围

As an international organization with a global emphasis on excellence, the Randstad Group expects all group companies and employees, including directors and officers, to behave at all times in accordance with our core values and Business Principles. This means acting responsibly, with integrity, and in compliance with Randstad policies and procedures, as well as applicable laws and regulations. We expect our employees to help Randstad maintain its excellent reputation by adhering to the high standards reflected in our core values: *to know, to serve, to trust, simultaneous promotion of all interests and striving for perfection.*

作为一个在全球追求卓越的国际组织，任仕达集团希望集团内的所有公司和员工，包括董事和高管，在任何时候都能按照我们的核心价值观和商业原则行事。这表示我们应当负责任地、诚信地行事，并遵守任仕达的政策和程序以及适用的法律和法规。我们希望我们的员工践行我们核心价值观所要求的高标准，从而保持任仕达良好的声誉：*了解、服务、信任、和谐共赢及臻于至善。*

Randstad promotes a culture of openness and accountability, and encourages all stakeholders to speak up on any (suspected) ethical concerns, dilemmas, or other incidents where conduct falls short of our core values and/or the Business Principles (Misconduct). Speaking up is essential to enable Randstad to protect our people, our company and values, our other stakeholders, and society as whole. However, as we understand that it takes courage to speak up, we want to offer you an easy and safe way to do so.

任仕达提倡开放和负责的文化，并鼓励所有利益相关者对任何（疑似）道德问题、困境或其他存在不符合我们核心价值观和/或商业原则行为的情况（不当行为）说出来。说出来对任仕达保护我们的员工、公司和价值观、我们的其他利益相关者以及整个社会至关重要。然而，我们知道说出来需要勇气，因此我们将为你提供简单且安全的方式来做到这一点。

This Misconduct Reporting Procedure explains what your options are to raise your concern and/or to speak up on (suspected) misconduct in confidence and without fear of retaliation.

本不当行为报告程序阐述了你可以通过各种方式来提出你的疑虑和/或在保密和不必担心被报复的情况下说出（疑似的）不当行为。

This Misconduct Reporting Procedure is applicable globally to all Randstad Group companies, and all stakeholders may use it to speak up on (suspicion of) misconduct within or relating to the Randstad Group.

本不当行为报告程序适用于任仕达集团全球范围内的所有公司，所有利益相关者均可使用该程序对任仕达集团内部或与之相关的（疑似的）不当行为进行举报。

2. our procedure - how it work

我们的程序 - 如何运作

2.1 introduction 简介

In order to facilitate the reporting of Misconduct (see paragraph 2.2) within or related to the Randstad Group, we have established dedicated channels through which a Stakeholder may voice concerns, either through local reporting mechanisms in place at company level or, for serious misconduct, through a report to the Local Integrity Officer, the Central Integrity Officer, or through our [Integrity Line](#), the Randstad Group speak-up facility (see paragraph 2.3).

为了便于报告任仕达集团内部或与之相关的不当行为（见第 2.2 节），我们建立了专门的渠道，利益相关者可以通过当地公司的报告机制提出疑虑，或者对于严重的不当行为，可以向当地诚信官、中央诚信官报告，或者通过我们的[诚信热线](#)、任仕达集团的举报机制（见第 2.3 节）。

Speaking up on potential Misconduct in accordance with this procedure ensures you are protected when you make a report (see paragraph 2.5). All concerns about potential Misconduct raised in accordance with our official procedures will be treated confidentially (except to the extent as required to conduct an adequate investigation (including the right of reply of any person accused) and, if necessary, to take appropriate action) and with the assurance that there will be no retaliation against anyone speaking up.

根据本程序说出潜在的不当行为，确保你在报告时受到保护（见第 2.5 节）。所有根据我们的正式程序提出的关于潜在不当行为的举报都将被保密（除非是为了进行充分的调查（包括任何被指控者的答辩权）以及在必要时采取适当的行动），并保证不会对任何举报的人进行打击报复。

who may speak up 谁可以举报

Our procedure is for any Stakeholder who wants to speak up.

我们的程序是为任何想要举报的利益相关者准备的。

Stakeholder refers to anyone within or outside (with a relation to) the Randstad Group, and may include:

利益相关者是指任仕达集团（与之有关系）内部或外部的任何人，可能包括：

- corporate employees, incl. officers and directors, board members, and trainees
公司雇员，包括管理人员和董事、董事会成员和培训生
- talent, incl. temporary staffing employees, independent contractors, freelancers, and the self-employed
人才，包括派遣员工、独立承包商、自由职业者和自雇人员
- former corporate employees and former talent employed by or through Randstad Group
任仕达集团或通过任仕达集团曾经雇用的企业员工和人才
- candidates and job seekers
候选人和求职者
- volunteers
志愿者
- clients and suppliers, and their staff and subcontractors
客户和供应商，以及他们的员工和分包商
- shareholders and investors

2.2 misconduct 不当行为

when to use this procedure 何时使用本程序

The [Integrity Line](#) can be used to speak up on incidents and situations if you reasonably suspect or have evidence of serious misconduct and/or unlawful behavior within or relating to the Randstad Group ("Misconduct").

如果你有理由怀疑或有证据表明在任仕达集团内部或存在与其有关的严重不当行为和/或非法行为 ("不当行为")，你可以使用 "[诚信热线](#)" 举报该事件和情况。

Examples of **Misconduct** (suspected or evidenced) that can be raised under this Misconduct Reporting Procedure include, for example, serious concerns related to:

可根据本不当行为报告程序举报的**不当行为**（疑似的或有证据）的例子包括，例如，与下列情况相关的严重问题：

- Randstad's core values, Business Principles, policies or procedures
任仕达的核心价值观、商业原则、政策或程序
- competition and antitrust laws and regulations
竞争和反垄断法律和法规
- discrimination and racism
歧视和种族主义
- harassment and intimidation
骚扰和恐吓
- sexual harassment
性骚扰
- bribery and corruption
贿赂和腐败
- other human rights principles (e.g., modern slavery/forced labor, child labor)
其他人权原则（例如，现代奴隶制/强迫劳动、童工）
- health and safety failures and environmental issues
健康和安全问题以及环境问题
- fraud or misappropriation of company assets
欺诈或挪用公司资产
- disclosure of confidential information, including personal data
披露机密信息，包括个人数据
- conflicts of interest
利益冲突
- criminal offenses
刑事犯罪
- failure to comply with obligations imposed by law or regulations (including incorrect finance and accounting practices), including any breaches of European Union law (see Annex 3).
未能遵守法律或法规规定的义务（包括虚假的财务和会计操作），包括任何违反欧盟法律的行为（见附件3）。

when NOT to use this procedure 不适用此程序的情况

If you have a question about or an issue with your employment conditions or performance review, your registration with Randstad, payroll or timesheet, your promotion or the workplace environment, this Misconduct Reporting Procedure does **not** apply. It also does **not** apply if you have a personal grievance, a conflict with or complaint about your manager or colleague if that does not amount to Misconduct,

如果你对你的工作情况或绩效考核、你在任仕达的登记、工资或工作时间、你的晋升或工作场所环境有疑问或问题，本不当行为报告程序不适用此类情况。如果你存在个人不满，与你的经理或同事存在冲突或投诉他们，如果这些并不构成不当行为，本程序也不适用。

You may raise those types of concerns via the appropriate local routes, such as your manager, your consultant or relevant branch manager, complaints or customer service line, or HR department.

你可以通过当地的合理途径提出这些问题，比如你的经理、顾问或相关的分支机构经理、投诉或客户服务热线，或人力资源部门。

If you work at a client of a Randstad Group company, any potential misconduct clearly relating to that client may also be subject to the client's reporting procedure.

如果你在任仕达集团公司的客户公司工作，任何明显与该客户相关的潜在不当行为也可能应适用该客户的报告程序。

when in doubt 如果你有疑虑

It will not always be easy to assess whether a concern or situation constitutes Misconduct. If in doubt, you may check with the Local Integrity Officer, or just speak up via the [Integrity Line](#) (see paragraph 2.4). If you do so, the Local Integrity Officer will review your report and let you know whether it is being followed up as a potential case of Misconduct under this procedure. If not, you will be referred to the relevant function or reporting line.

评估一个问题或情况是否构成不当行为并不总是那么容易。如果有疑问，你可以向当地诚信官确认，或者直接通过[诚信热线](#)（见第 2.4 节）提出。当地诚信官将审查你的报告，并告知你是否会根据本程序将其作为潜在的不当行为案件处理。如果不是，你将被告知可处理该情况的相应的职能部门或报告热线。

2.3 where and how to speak up 在哪里以及如何举报

Any employee who reasonably suspects or has witnessed potential Misconduct is expected to report it.

任何员工如果合理地怀疑或目睹了潜在的不当行为，都应该报告。

For many matters, it can be a good first step to talk to the person involved directly, even though this may not always be easy, or to your manager or other regular (local) reporting channels. Even when we facilitate easy and safe speaking up, this should not immediately replace normal dialogue, feedback and Great Conversations, which form the foundation of our core values.

对于许多事情，尽管这可能并不容易，但直接与相关人员沟通是很好的第一步，或者可以与你的经理或其他常规（当地）报告渠道进行沟通。即使我们为举报创造方便和安全的条件，但其不应该取代正常的交流、反馈和深度谈话，这些构成了我们核心价值观的基础。

However, if you feel this is not appropriate or you do not feel comfortable doing so, you can report to your Local Integrity Officer or the Central Integrity Officer directly, or make use of the [Integrity Line](#).

但是，如果你觉得这样做不合适或者不舒服，你可以直接向你的地方诚信官或中央诚信官报告，或者使用[诚信热线](#)。

your manager, HR representative, legal counsel, risk & audit, or other trusted role 你的经理、人力资源代表、法律顾问、风险和审计、或其他值得信赖的角色

As a general guideline, the first person to approach when raising a concern is your direct manager (for employees), your consultant or their manager (for talent), or your regular business contact (other external stakeholders). You may also choose, depending on the nature of the concern, to discuss the matter with your HR representative, legal counsel, risk & audit, or other trusted party (e.g., ombudsman, confidant) in the organization. They may be able to help, mediate or guide you to the best function to address your concern. Speaking to management is usually the fastest and preferred route, and the best way to ensure a good and open work environment throughout the Randstad Group.

作为一般准则，在提出疑虑时，首先要接触的人是你的直接经理（针对员工）、你的顾问或其经理（针对人才），或你的日常业务联系人（其他外部利益相关者）。你也可以根据问题的性质，选择与你的人力资源代表、法律顾问、风险与审计，或组织中其他值得信赖的人（例如，监察员、知情人）讨论此事。他们可能能够帮助、调解或指导你找到解决你疑虑的最适合的职能部门。与管理层沟通通常是最快和较好的途径，也是确保任仕达集团良好和开放的工作环境的最佳方式。

your Local Integrity Officer and the Central Integrity Officer 你的当地诚信官和中央诚信官

If your concern relates to potential Misconduct, you may also report directly to your Local Integrity Officer.

如果你的疑虑与潜在的不当行为有关，你也可以直接向你的当地诚信官报告。

The **Local Integrity Officer** is the impartial person or function that ensures that all cases reported to the **Integrity Line** as well as those reported to him/her directly, are assessed and then either forwarded to the appropriate team/role for follow-up, or (if the report is assessed as potential Misconduct) investigated and dealt with in a lawful and timely manner, while fully respecting the rights of all individuals involved. Every country/Randstad Group company (including Randstad N.V.) has its own Local Integrity Officer. The Local Integrity Officer may either be a trusted Randstad employee or an external party, as deemed appropriate by the relevant managing director and the Central Integrity Officer.

当地诚信官员是一个公正的人或职能部门，确保向**诚信热线**报告的所有案件以及直接向他/她报告的案件得到评估，然后转交给适当的团队/角色进行跟进，或（如果报告被评估为潜在的不当行为）以合法和及时的方式进行调查和处理，同时充分尊重所有相关个人的权利。每个国家/任仕达集团的公司（包括任仕达 N.V.）都有自己的当地诚信官。地方诚信官可以是受信任的任仕达员工，也可以是相关区域董事总经理和中央诚信官认为合适的外部人士。

Local Integrity Officer contact details:

当地诚信官的联系方式：

name: **Wendy Wu**

姓名：**Wendy Wu**

email: localintegrityofficer@ cn.randstad.com

电子邮件: localintegrityofficer@ cn.randstad.com

address: Room2308 , No.77 Meiyuan Road, Shanghai HR Building, Jing'an Distirct, Shanghai, China (postal code 200070)

地址：上海市静安区梅园路 77 号 2308 室 (邮编：200070)

If you want to speak with the Local Integrity Officer by phone or in person, please indicate this in your message.

如果你想通过电话或亲自与当地诚信官沟通，请在你的信息中表明。

If the suspected Misconduct involves senior management in your company, you can also reach out directly to the Central Integrity Officer at Randstad N.V.

如果疑似的不当行为涉及你公司的高级管理层，你也可以直接联系 Randstad N.V. 的中央诚信官。

The **Central Integrity Officer** is the impartial person or function appointed by the Randstad N.V. Executive Board to coordinate integrity issues under this procedure, and to provide regular reports to the Executive Board and annually to the Audit Committee of the Supervisory Board on cases reported via the **Integrity Line** or directly to the Local Integrity Officers and Central Integrity Officer.

中央诚信官是由 Randstad N.V. 执行委员会任命的公正的人员或职能部门，负责协调处理本程序规定的诚信问题，并就通过**诚信热线**或直接向当地诚信官和中央诚信官报告的案件，向执行委员会定期报告，同时每年向监事会审计委员会提交报告。

The Central Integrity Officer ensures that any reports under this procedure on suspected Misconduct by one or more members of the management team of a Randstad Group company are reviewed centrally.

中央诚信官确保根据本程序对任仕达集团公司管理团队的一名或多名成员涉嫌不当行为的任何报告进行集中审查。

You may reach out to the Central Integrity officer by email (complianceofficer@randstad.com), or send a letter to Central Integrity Officer, Randstad N.V., P.O. Box 12600, 1100 AP Amsterdam-Zuidoost, The Netherlands.

你可以通过电子邮件（complianceofficer@randstad.com）与中央诚信官联系，或者将信件寄到 Central Integrity Officer, Randstad N.V., P.O. Box 12600, 1100 AP Amsterdam-Zuidoost, The Netherlands.

the Integrity Line: online or by phone 诚信热线：线上或电话

If you suspect or have witnessed Misconduct that cannot be reported via the regular reporting channels (e.g., because these are likely to be inappropriate or ineffective, or because you do not feel comfortable reporting your issue through these channels), you can speak up via the **Integrity Line**.

如果你怀疑或见证了不能通过常规渠道报告的不当行为（例如，因为这些渠道可能是不恰当的或无效的，或者因为你不希望通过这些渠道报告你的问题），你可以使用“**诚信热线**”。

Reports can be submitted through the **Integrity Line** in the local language or in English, either online or orally (by phone). The **Integrity Line** consists of a secure webpage and a telephone hotline, accessible 24 hours a day via free local access numbers. Both are operated by an independent external provider. For full contact details and user instructions, see annex 2.

报告可以通过“**诚信热线**”以当地语言或英语在线或口头（通过电话）提交。“**诚信热线**”由安全的网页和电话热线组成，可以每天 24 小时通过免费的本地号码接入。两者都由独立的外部供应商运营。该热线完整的联系方式和用户说明，请详见附件 2。

Although reports may also be submitted anonymously, Randstad encourages you to tell us who you are when you speak up, as this greatly facilitates the investigation of the report.

虽然报告可以匿名提交，但任仕达鼓励你在举报时告诉我们你是谁，因为这将极大有助于对举报的调查。

the [Integrity Line](#) details for your country:

你所在国家的 "诚信热线" 详细信息 :

free phone: 10800 744 0179 OR 10800 440 0179

免费电话号码 : 10800 744 0179 或 10800 440 0179

web access: <https://www.speakupfeedback.eu/web/integrityatrandstad/cn>

网络地址 : <https://www.speakupfeedback.eu/web/integrityatrandstad/cn>

access code: 42118

访问代码 : 42118

language options: Mandarin, Cantonese, English

语言选项 : 普通话, 粤语, 英语

The Central Integrity Officer (online only) for the Randstad Group can be reached via:

web access: www.speakupfeedback.eu/web/integrityatrandstad/nl

access code: 55984

可以通过以下方式联系任仕达集团的中央诚信官 (仅限在线) :

网络访问 : www.speakupfeedback.eu/web/integrityatrandstad/nl

访问代码 : 55984

language options: English, or your local language (but allow additional time for translation of your message).

语言选项 : 英语 , 或你的当地语言 (但需留出额外的时间来翻译你的信息) 。

Reports made to the [Integrity Line](#) are received by the Local Integrity Officer and will also be shared with the Central Integrity Officer at Randstad N.V.

通过 [诚信热线](#) 提交的报告由当地诚信官接收 , 同时也将抄送给 Randstad N.V 的中央诚信官。

speaking up anonymously 匿名举报

If you want to report anonymously, Randstad strongly advises that you report through the [Integrity Line](#). This allows us to handle your report of potential Misconduct in the most efficient way, helps to minimize unreliable and false reports, best protects the privacy of everyone involved, and enables the Local Integrity Officer and/or Central Integrity Officer to communicate efficiently with you. Randstad does not need to know who you are, but using the [Integrity Line](#) makes safe dialogue possible.

如果你想匿名举报 , 任仕达强烈建议你通过 "诚信热线" 报告。这使我们能够通过最有效的方式处理你对潜在不当行为的报告 , 有助于最大限度地减少不可靠的和虚假的报告 , 最好地保护每个人的隐私 , 并使当地诚信官和/或中央诚信官能够与你有效沟通。任仕达不需要知道你是谁 , 但使用 "诚信热线" 可以确保沟通是安全的。

When speaking up anonymously, please make sure to provide sufficient details in order to allow your concern to be addressed. Anonymous reports that do not include sufficient details cannot be investigated.

在匿名举报时 , 请确保提供足够的细节 , 以使您举报的问题得到解决。内容不充分的匿名举报将不予调查。

what to include when you speak up 举报时应包括哪些内容

Randstad values any report made in good faith, whether anonymous or not. However, in order to be able to assess the merit of the report and decide on how to follow up, the Local Integrity Officer needs as much detail as possible.

任仕达重视任何善意的举报 , 无论其是否匿名。然而 , 为了能够评估报告的价值并决定如何跟进 , 地方诚信官需要尽可能多的细节。

Consider the following aspects when you speak up:

在你举报时，要考虑以下几个方面：

what happened?

发生了什么事？

who is involved - who did what and were there any witnesses?

谁参与其中 - 谁做了什么，是否有任何证人？

when did it happen?

什么时候发生的？

where did it happen?

在哪里发生的？

how did it happen - what means or methods were used?

它是如何发生的 - 使用了什么手段或方法？

if you know, **why** did it happen?

如果你知道，为什么会发生？

We also encourage you to share any evidence, document, reference, photo, or any other relevant information that may assist us in assessing the report in a more efficient manner. If you do not have such evidence, any reference or recommendation of where to look for such material will be helpful.

我们也鼓励你分享任何证据、文件、参考资料、照片或其他相关信息，以帮助我们以更有效的方式评估该报告。如果你没有上述证据，提供其他的参考资料或建议到哪里去寻找此类材料都会有帮助。

You may not be able to address all aspects, but the more information we have, the better we can assess and follow up. When you report via the [Integrity Line](#), the Local Integrity Officer and/Central Integrity Officer may reach out to you (also via the [Integrity Line](#)) with further questions.

你可能无法提供所有提及的内容，但我们掌握的信息越多，我们就能更好地评估和跟进。当你通过“[诚信热线](#)”举报时，地方诚信官和/或中央诚信官可能会与你联系（也是通过“[诚信热线](#)”），提出进一步的问题。

2.4 handling of reports made via the Integrity Line or directly to the Local Integrity Officer 处理通过“[诚信热线](#)”或直接向当地诚信官提出的报告

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

通过 [诚信热线](#) 收到的报告将告知相关公司的当地诚信官。同时，报告的副本也会被发送给 Randstad N.V.的中央诚信官。

Both the Local Integrity Officer and the Central Integrity Officer are impartial functions. The [Integrity Line](#), the Local Integrity Officer, and the Central Integrity officer offer a secure way to speak up. This way of speaking up ensures you are using reporting channels that protect your confidentiality as well as that of third parties. Access to non-authorized persons is restricted.

地方诚信官和中央诚信官都是公正的职能部门。[诚信热线](#)、当地诚信官和中央诚信官是安全的举报途径。这些举报途径确保你使用的渠道能够为你及第三方保密。非授权人员对此类信息的接触将受到限制。

initial assessment and response 初步评估和反应

The Local Integrity Officer will confirm to you the receipt of your report, received directly or through the [Integrity Line](#), within seven days of receipt. The Local Integrity Officer will also inform you whether the matter reported is assessed as a potential Misconduct, or whether it is a matter that should be handled through the normal (local)

reporting procedures (e.g., HR representative, client contact, payroll, complaints, or customer service & support line). If further information is required to make this assessment, this will be addressed in the response message.

当地诚信官将在收到你的报告（直接收到或通过[诚信热线收到](#)）后七天内向你确认。当地诚信官还将告知你，所报告的事项是否被评估为潜在的不当行为，或者是否属于应通过正常（当地）举报程序处理的事项（例如，人力资源代表、客户联系人、工资单、投诉或客户服务和支持热线）。如果需要进一步的信息来进行评估，也将在回复信息中予以说明。

If the matter should be handled through the normal (local) reporting procedures, the Local Integrity Officer will provide the relevant details in the response message, or contact the relevant local function to handle the report, depending on the nature of the message and the contact details that you provided.

如果此事应通过正常的（当地）举报程序来处理，当地诚信官将在回复信息中提供相关细节，或者根据信息的性质和你提供的联系方式，联系当地相关职能部门来处理该举报。

the investigation and feedback 调查和反馈

The Local Integrity Officer ensures that all reported cases of potential Misconduct are investigated and dealt with in a lawful and timely manner, while respecting the rights of all individuals involved, in accordance with Randstad's investigation procedure.

确保所有报告的潜在不当行为案件得到合法和及时的调查和处理，同时根据任仕达的调查程序，尊重所有相关人员的权利。

In certain instances such cases may be referred to and handled by a local management representative and/or other relevant functions of the company, depending on the nature of the report. In these cases, the same practices with regard to, for example, confidentiality, non-retaliation and timeframes still apply.

在某些情况下，这类案件可能会被提交给当地管理层和/或公司的其他相关职能部门并由其处理，这取决于报告的性质。在这些情况下，有关保密、不报复和时限等方面的相同做法仍然适用。

After due assessment, the Local Integrity Officer may decide not to investigate a report if, for example:

- 经过适当评估，当地诚信官可以决定对报告事项不展开调查，例如，以下情况：
there is insufficient information for a fair investigation and it is not possible to obtain further information;
- 没有足够的信息来进行公平的调查，而且无法获得进一步的信息 there is a clear indication that the report was not based on merit, but was made in bad faith and with the mere intention to harm individuals or the company rather than to address Misconduct.

有明确迹象表明，该报告不是基于诚信，而是出于恶意，仅仅是为了伤害某些人或公司，而不是为了解决不当行为。

During the investigation, the Local Integrity Officer or other relevant function involved in the investigation may also reach out to you (via the [Integrity Line](#) or, when possible, directly) for further clarification.

在调查期间，当地诚信官或参与调查的其他相关职能部门也可能与你联系（通过["诚信热线"](#)或在可能的情况下直接联系），以进一步了解情况。

At the latest three months from the acknowledgement of receipt, the Local Integrity Officer will provide feedback. If the investigation is not yet concluded at that time, further feedback will be provided again at a later moment. Please note that it is not always possible to share the details of the progress or outcome of the investigation for reasons of confidentiality, privacy and the legal rights of the parties involved. All parties are entitled to confidentiality, including the accused. Therefore, if you participate in or learn about an investigation, you must also keep the matter confidential.

在确认收到举报后的三个月内，当地诚信官将提供反馈。如果届时调查尚未结束，将在稍后的时间再次提供进一步的反馈。请注意，出于保密、隐私和有关各方法律权利的原因，并不总是能够与你分享调查的进展或调查结果的细节。所有各方都有权被保密，包括被举报人。因此，如果你参与或了解到一项调查，你也必须对其保密。

the Central Integrity Officer 中央诚信官

If the potential Misconduct involves one or more members of the local management team of a Randstad Group company, the Local Integrity Officer will redirect the report to the Central Integrity Officer. The Central Integrity Officer may inform local management and will inform the responsible member of the Randstad N.V. Executive Board and/or the Audit Committee of the Supervisory Board, subject to confidentiality and there being no potential conflict of interest.

如果潜在的不当行为涉及到任仕达集团公司当地管理团队的一名或多名成员，当地诚信官将把报告转给中央诚信官。中央诚信官可能通知当地管理层，并将通知 Randstad N.V. 执行委员会和/或监事会审计委员会的负责成员，但须确保是保密的且不存在潜在的利益冲突。

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

与 Randstad N.V. 执行委员会或监事会的一名或多名成员有关的报告将由 Randstad N.V. 的当地诚信官处理，他同时也是监事会成员。

conclusions and actions taken 结论及采取的行动

After the investigation is concluded, prompt and appropriate corrective action will be taken when and as warranted in the judgment of the relevant management level, taking into account the relevant company functions (e.g., HR, Legal). Corrective action in the event of proven Misconduct may vary from a written warning, coaching, and/or apologies to those affected by the Misconduct through to the suspension or termination of the contract of or relationship with those responsible for the Misconduct, reporting to the appropriate authorities, and/or any other action relevant to the specific Misconduct.

在调查结束后，根据相关管理层的判断，结合公司相关职能部门（例如，人力资源部门、法律部门）的意见，将采取迅速和适当的整改措施。在证明存在不当行为的情况下，整改措施可能包括书面警告、辅导、和/或向受不当行为影响的人道歉，以及暂停或终止与不当行为责任人的合同或关系，向有关主管机关报告，和/或与具体的不当行为有关的任何其他行动。

2.5 protecting your rights when you speak up via the Integrity Officer and/or Integrity Line 当你通过诚信官和/或诚信热线举报时，保护你的权利

Protecting your right to speak up on potential Misconduct is essential. One of the main purposes of this procedure is exactly that. This protection applies when you have reasonable grounds to believe that the information you report is true at the time of reporting, and this information constitutes Misconduct.

保护你对潜在不当行为举报的权利是至关重要的。本程序的主要目的之一正是如此。当你有合理的理由相信你所举报的信息在报告时是真实的，并且该信息构成不当行为时，就应当受到保护。

Below, some key principles are highlighted.

以下强调了一些关键原则。

Confidentiality 保密

All concerns raised via the [Integrity Line](#) or with the Local Integrity Officer directly are treated as confidential to the maximum extent, including your identity, consistent with the need to conduct an investigation (and, if necessary, take appropriate action). This also applies to anyone assisting you when speaking up in a work-related context. Exceptions to confidentiality are possible when Randstad is under a legal or regulatory obligation to disclose the information, or if the report is made in bad faith.

通过“[诚信热线](#)”或直接向“当地诚信官”提出的所有问题都将在最大程度上得到保密，包括你的身份，以符合进行调查（以及在必要时采取适当行动）的需要。这也适用于在与工作有关的情况下协助你举报的任何人。当任仕达有法律或监管义务披露信息，或者如果举报是恶意的，有可能存在保密的例外情况。

Information will only be shared with a limited number of authorized people directly involved in the investigation on a strict need-to-know basis. This may include external advisors involved in an investigation. Your identity and other information from which your identity may be deduced will not be disclosed to anyone beyond these people without your explicit consent. Depending on the purpose of sharing, the Local Integrity Officer will (further) anonymize the information prior to sharing it.

信息只在严格的“需要知道”的基础上向直接参与调查的有限的被授权人披露。可能包括参与调查的外部顾问。未经你的明确同意，你的身份和可以推断出你身份的其他信息不会向这些人之外的任何人披露。根据分享信息的目的，当地诚信官可能在披露信息之前（进一步）做匿名处理。

In principle, we are obliged to inform any person under investigation that he or she is the subject of an allegation of potential Misconduct. This notification may be delayed if there is a substantial risk that this jeopardizes the investigation or the gathering of evidence. Also in this case your identity will not be disclosed.

原则上，我们有义务通知接受调查的人，他/她是潜在不当行为被指控的对象。如果存在危及调查或证据收集的重大风险，可能会延迟对其通知。这种情况下，你的身份也不会被披露。

When you speak up in accordance with this procedure, Randstad is committed to treating your report seriously and with care. Randstad expects that you treat it in the same manner, also respecting confidentiality to the extent possible, in accordance with your contractual and confidentiality obligations. You should therefore avoid any form of external or internal publicity without first making use of internal procedures, unless external reporting is required or otherwise authorized by applicable law. Randstad reserves its rights with regard to any breach of such contractual or other confidentiality obligations.

If you decide to report alleged misconduct externally while an investigation by a Randstad Group company is ongoing, Randstad may decide to no longer involve you in that investigation or to stop the investigation and take any other steps it considers necessary.

当你按照本程序举报时，任仕达承诺将认真和谨慎地对待你的报告。任仕达希望你能同样的认真和谨慎，同时根据你的合同和保密义务，尽可能地做到保密。因此，除非是依照法律要求或被授权，你应当避免在未通过内部程序举报的情况下，以任何形式将其在外部或内部披露。对于任何违反此类合同或其他保密义务的行为，任仕达保留追究责任的权利。

如果你决定在任仕达集团公司针对某项涉嫌的违规行为正在进行调查时，将该情况向外部披露，任仕达可能决定不再让你参与该调查，或停止调查并采取其认为必要的任何其他行动。

privacy/data protection 隐私/数据保护

Any personal data obtained as part of any report and investigation under this procedure (including of the person speaking up, any person under investigation, and any witnesses) will only be used for the purposes described in this procedure and in accordance with relevant data protection laws and Randstad's data protection policy. Personal data that is clearly not relevant for handling of a specific report shall be deleted without undue delay.

因根据本程序报告和调查而获得的任何个人数据（包括举报人、被调查的人和证人）将仅被用于本程序中描述的目的，并符合相关数据保护法和任仕达的数据保护政策。与处理特定报告明显不相关的个人数据应被删除，且不得无故拖延。

Personal data on the [Integrity Line](#) will be deleted by the Local Integrity Officer three months after a case is closed. Personal data collected as part of an investigation may be retained for a longer period if this is required due to the nature of the allegations and/or investigation up to the maximum statutory limitation period for the relevant country, but no longer than is necessary and proportionate.

在案件结束后的三个月内，“诚信热线”上的个人数据将由当地诚信官删除。如果由于指控和/或调查的性质需要，作为调查的一部分而收集的个人数据可以保留更长的时间，但不得超过相关国家的法定最长期限。

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

个人数据只能向需要知道的人披露，且仅应基于调查需要和有必要采取适当行动的情况，应尽可能地符合保密义务。如果任仕达有披露信息的法律或监管义务，或者如果举报是恶意的，则可能出现例外情况。

non-retaliation 不报复

We encourage speaking up, and any person who speaks up will be protected from any form of threat or retaliation, provided that the reporting person has reasonable grounds to believe that the information on the potential Misconduct reported is true at the time of the report. You will not be blamed or held liable when you report in good faith and in accordance with this procedure.

我们鼓励你举报，任何举报的人都将受到保护，不受任何形式的威胁或报复，前提是举报人有合理的理由相信在报告时所报告的潜在不当行为的信息是真实的。当你按照本程序善意举报时，你将不会受到指责或被追究责任。

Randstad will not retaliate against anyone reporting potential Misconduct. For example, Randstad will not discharge, demote, suspend, threaten, harass, or in any manner discriminate against anyone reporting potential Misconduct. This also applies to the person who assists the person speaking up in a work-related context.

任仕达不会对任何报告潜在不当行为的人进行报复。例如，任仕达不会解雇、降职、停职、威胁、骚扰或以任何方式歧视报告潜在不当行为的人。这也适用于与工作相关的情况下协助举报者的人。

The right of non-retaliation is guaranteed under the Business Principles, and violation of this right will not be tolerated. Any form of threat or retaliation aimed at speaking up may lead to disciplinary measures.

我们的商业原则保障了不被报复的权利，侵犯这一权利的行为不会被容忍。任何针对举报的威胁或报复行为都可能遭受纪律处分。

If you notice or experience any threat or retaliation, you can report this via the [Integrity Line](#) or directly to the Central Integrity officer.

如果你注意到或遇到任何威胁或报复，你可以通过[诚信热线](#)或直接向中央诚信官报告。

When you speak up in accordance with this procedure on Misconduct in which you have participated yourself, Randstad will consider taking this into account as a mitigating factor when assessing the consequences of such Misconduct.

当你根据本程序说出你自己参与的不当行为时，任仕达将考虑在评估此类不当行为的后果时将其作为减低处罚的因素加以考虑。

exception: reporting in bad faith 例外：恶意举报

Reports are considered to have been made in bad faith if the reporting person knows, at the moment of reporting, that the allegation made is not true. This could be the case, for instance, when this procedure is abused (a) because of personal grievances, (b) for personal benefit, or (c) to intentionally harm the Randstad Group or any of its employees, including officers and directors. The Randstad Group sees reporting in bad faith as a very serious violation of our Business Principles.

如果举报人在举报时知道所提出的指控不属实，则会被认定为恶意举报。例如，在以下情况下可能会出现这种情况：(a)因为个人不满，(b)为了个人利益，或(c)故意伤害任仕达集团或其员工，包括高管和董事，而滥用本程序。任仕达集团认为恶意举报是对我们商业原则非常严重的违反。

If appropriate, the Randstad Group may take further action (including disciplinary action) against anyone who knowingly makes a report in bad faith.

如有必要，任仕达集团可对任何故意恶意举报的人采取进一步行动（包括纪律处分）。

2.6 protecting the subject of an investigation 保护调查对象

A person subject to an investigation into a potential Misconduct is also entitled to protection. The presumption of innocence is a leading principle. The Local Integrity Officer is responsible for monitoring and managing this procedure, also towards anyone who is accused of – or otherwise involved in – any potential Misconduct.

接受潜在不当行为调查的人也有权得到保护。无罪推定是一项主要原则。当地诚信官负责监督和落实本程序，也负责监督和管理任何被指控或参与潜在不当行为的人。

The person under investigation of a potential Misconduct will normally be notified of this fact within a reasonable timeframe, depending on the facts and circumstances and whether there is a perceived risk of destruction of evidence, retaliation and/or obstruction of the investigation.

接受潜在不当行为调查的人通常会在合理的时间范围内被告知这一情况，这取决于事实和条件、以及是否存在破坏证据、报复和/或阻碍调查的明显风险。

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis.

所有提出的问题或事项都会得到保密处理。信息只在严格的“需要知道”的基础上与少数人分享。

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

被调查者有权对指控作出回应，并可对任何不利的调查结果或决定提出申诉。

3. accountability and disciplinary action 问责和纪律处分

The Randstad N.V. Executive Board has overall responsibility for the Misconduct Reporting Procedure and its application. Management of each Randstad Group company is obliged to ensure that this Misconduct Reporting Procedure is implemented within their organization, and the Local Integrity Officer can function in accordance with this procedure.

Randstad N.V. 执行委员会对不当行为报告程序及其适用负有全面责任。任仕达集团各公司的管理层有义务确保本不当行为报告程序在其组织内实施，并且当地诚信官可以根据本程序发挥其职能。

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

任仕达期望任仕达集团内的各级管理层认真、保密、迅速地处理所有关于任何潜在不当行为的报告，并确保举报人不会面临威胁或报复。管理层有义务充分配合对潜在不当行为的任何调查。

Failure to comply with this procedure, including threats or retaliation against anyone speaking up in accordance with this procedure, and failure to take reasonable steps or reasonable care to protect the identity of the person speaking up may be subject to disciplinary action.

如果不遵守本程序，包括威胁或报复任何根据本程序举报的人，以及不采取合理步骤或合理注意保护举报人的身份，可能会受到纪律处分。

The Randstad N.V. Executive Board, after consultation with the Supervisory Board, may amend this procedure at any time in a manner consistent with the requirements of applicable laws and regulations, and will involve the Randstad European Works Council. Where relevant the local Works Councils will be involved for local implementation.

Randstad N.V.执行委员会在与监事会商议后，可在任何时候以符合适用法律和法规要求的方式修订本程序，同时任仕达欧洲工作委员会也将参与其中。在相关情况下，地方工作委员会将参与当地的具体实施。

document control 文本控制

Corporate Policy title 公司政策名称	Randstad Group misconduct reporting procedure 任仕达集团不当行为报告程序			
Description 描述	procedure for speaking up on potential Misconduct and the protection of the person speaking up 对潜在的不当行为进行举报的程序以及对举报人的保护			
Owner 负责部门	Executive Board 执行委员会			
Author 作者	Dieuwke Visser			
creation data of v.3 创建日期	xx - xxx - 2022			
confidentiality level 保密等级	C1 - Public; C1—公开			
Version number 版本号	Modified by 修订人	Main modifications made 主要修订内容	Modification date 修订日期	Status 状态
			dd/mm/yyyy	

annex 1 - summary [to be updated/improved]

附件 1 – 摘要 [待更新/改进]

randstad group

misconduct reporting procedure.

任仕达集团 不当行为报告程序

are you concerned about misconduct?

Some examples:

- Is this a health & safety issue?
- I feel discriminated or harassed.
- Is this fraud?
- I suspect a breach of competition law.
- I think this gift is way too expensive.
- This is misuse of company assets!
- Is this a breach of human rights?
- I suspect bribes are being paid.

who can you talk to?

- If possible, talk to the person involved.
- Talk to your HR manager, HR business partner, confidant, risk & audit manager¹, privacy officer² or legal counsel³
- You may also contact your local integrity officer via the local website.

1. fraud reporting
2. data breach, abuse of personal data and other privacy related matters
3. always for competition and bribery issues or questions

如果这些途径可能不合适或者无效，您可以：

- 向中心廉正专员发邮件，邮箱：complianceofficer@randstad.com，或
- 通过任仕达集团廉正专线 4 提交报告或疑问（独立的外部供应商 People Intouch 运营的 Sneakun 专线）

if these options seem inappropriate or ineffective you may also:

- Send an email to the central integrity officer at: complianceofficer@randstad.com or
- Submit a report or question through the Randstad Group Integrity Line* (SpeakUp, managed by People Intouch, an independent external provider). On randstad.com you can find further details, including local free phone number, webaccess and access codes per country.

您了解不当行为吗？

一些例子：

- 这是健康和安全问题吗？
- 我觉得遭受歧视或骚扰。
- 这是欺诈吗？
- 我怀疑这违反了竞争法。
- 我觉得这个礼物太贵重了。
- 这是滥用公司资产！
- 这违反了人权吗？
- 我怀疑有人花钱进行了贿赂。

您可以告诉谁？

- 可以的话，和涉及到的那个人谈一谈。
 - 告诉您的人力资源经理、人力资源业务伙伴、知己、风险和审计经理 1、隐私官 2 或法律顾问 3。
 - 您可通过本地网站联系本地廉正专员。
1. 欺诈报告。
 2. 滥用个人数据和其他有关隐私的事宜
 3. 竞争问题、贿赂问题或疑问

We realize it is not always easy to raise concerns about possible misconduct, but we do encourage you to share your concerns with Randstad. Your concerns will be dealt with carefully and confidentially (to the extent possible). No retaliation against good faith complainants will be tolerated.

For the full procedure see: randstad.com

我们明白对疑似不当行为进行举报不是一件容易的事，但是我们鼓励您和任仕达分享您的疑问。您提交的问题会尽可能认真保密处理。我们绝不容忍对善意举报者进行报复。请在公司官网 randstad.com 上查询完整的程序。

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annex 2 - user instructions & contact details

附件 2 –使用指引和联系信息

Integrity Line user instructions

诚信热线使用指引

When you prepare to speak up via the [Integrity Line](#), consider the following aspects for reporting:

如果你打算通过**诚信热线** 举报，请考虑以下几个方面：

- **what** happened?
发生了什么事？
- **who** is involved - who did what and were there any witnesses?
谁参与其中 - 谁做了什么，是否有任何证人？
- **when** did it happen?
什么时候发生的？
- **where** did it happen?
在哪里发生的？
- **how** did it happen - what means or methods were used?
它是**如何**发生的 - 使用了什么手段或方法？
- if you know, **why** did it happen?
如果你知道，**为什么会**发生？

If possible, you may share, along with the online report, any evidence, document, reference, photo, or any relevant information, which may assist us in assessing the report in a more efficient way. If you do not have such evidence, any reference or recommendation of where to look for such material will be helpful

如果可能，你可以与在线报告同时发送证据、文件、参考资料、照片或任何相关信息，这可能有助于我们以更有效的方式评估报告。如果你没有这样的证据，任何参考资料或建议到哪里去找这些材料都会有帮助。

Free phone line - reporting orally

免费的电话热线 - 口头举报

- The person reporting dials the applicable free phone number; the telephone call is received by a voice-response system. After making the report, the reporting person receives a unique case number. The report can be made in the local language or in English. The external provider then sends a word-for-word transcript of the voice recording to the Local Integrity Officer of the country/company concerned.

举报人可拨打免费电话号码；电话由语音应答系统接收。报案后，举报人会收到一个专门的案件编号。报告可以用当地语言或英语进行。然后，外部供应商会逐字逐句的将语音记录发送给有关国家/公司的当地诚信官。

- please speak clearly
请说清楚
- if you want to be contacted directly, make sure you leave your contact details; your phone number is NOT registered when you report by phone
如果你想直接被联系，请确保留下你的具体联系方式；当你通过电话举报时，你的电话号码不会被记录
- **register your unique case number for communication purposes**

记录你的专门案件编号，以便进行沟通

- For protection of the reporting person's anonymity, the voice recording remains with the external provider and is destroyed as soon as the Local Integrity Officer has confirmed receipt of the transcript. 为确保举报人匿名，语音记录由外部供应商保留，并在当地诚信官确认收到记录稿后立即销毁。

- Via the unique case number, the Local Integrity Officer will leave a reply message for the reporting person to confirm receipt of the report and, if necessary, to ask verification questions or summarize a conclusion. After the initial report, the Local Integrity Officer will post a reply within a maximum of seven days from receipt of the message.

Please check for a response message!

Your phone number is not registered when you report.

通过专门的案件编号，当地诚信官将给举报人回复信息，确认收到举报，并在必要时提出核实问题或得出结论。在初次举报后，当地诚信官将在收到信息后最多七天内提供回复信息。

请检查是否有回复信息!

你的电话号码在你报告时没有登记。

- Using the unique case number, the person making the report can call the free phone line again to hear the reply from the Local Integrity Officer. The person reporting can choose whether to answer questions immediately or at a later stage.

举报人可以再次拨打免费电话，使用专门的案件编号听取当地诚信官的回复。举报人可以选择立即回答问题或稍后回答。

Online reporting form

在线举报表格

- The person making the report goes to the relevant web page, leaves a message by entering a text (in the local language or in English), and receives a unique case number. The external provider translates the message (if not in English) and sends the translation plus a copy of the web message to the Local Integrity Officer of the country/company concerned.

报告人进入相关网页，通过输入文字（当地语言或英语）留下信息，并收到一个专门的案件编号。外部供应商翻译该信息（如果不是英语），并将翻译和网络信息的副本发送给相关国家/公司的当地诚信官

- Via the unique case number, the Local Integrity Officer can leave a reply message for the reporting person to confirm receipt of the report and, if necessary, to ask verification questions or summarize a conclusion. After the initial report, the Local Integrity Officer will endeavor to post a reply within a maximum of five working days.

通过专门的案件编号，当地诚信官可以给举报人留下回复信息，确认收到报告，并在必要时提出核实问题或得出结论。在初次报告后，当地诚信官将努力在最多五个工作日内提供答复

- The person making the report can use the case number to log in again, and will then be able to see the reply from the Local Integrity Officer. The person reporting can choose whether to answer questions immediately or at a later stage.

举报人可以使用案件编号再次登录，就能看到当地诚信官的答复。举报人可以选择立即回答问题或者稍后回答。

Contact details per country are given on the following pages.

每个国家的详细联系方式见以下几页。

annex 3 - breaches of European Union law

附件 3--违反欧盟法律的行为

Breaches of European Union law concern the following areas:

违反欧盟法律的行为涉及以下领域：

public procurement;

公共采购

financial services, products and markets, and prevention of money laundering and terrorist financing;

金融服务、产品和服务，以及防止洗钱和资助恐怖主义

product safety and compliance;

产品安全和合规

transport safety;

运输安全

protection of the environment;

环境保护

radiation protection and nuclear safety;

辐射保护和核安全

food and feed safety, animal health and welfare;

食品和饲料安全、动物健康和福利

public health;

公共健康

consumer protection;

消费者保护

protection of privacy and personal data, and security of network and information systems.

保护隐私和个人数据，以及网络和信息系统的的功能

Breaches affecting the financial interests of the Union as referred to in Article 325 TFEU and as further specified in relevant Union measures;

TFEU 第 325 条所述的以及相关欧盟措施中进一步规定的的影响欧盟金融利益的违规行为；

Breaches relating to the internal market, as referred to in Article 26(2) TFEU, including breaches of Union competition and State aid rules, as well as breaches relating to the internal market in relation to acts which breach the rules of corporate tax or to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law.

TFEU 第 26(2)条中提到的与内部市场有关的违规行为，包括违反欧盟竞争和国家援助规则，以及与违反公司税收规则相关的或为了获得税收利益而违反公司税法的目标或宗旨的与内部市场有关的违规行为。



