



Ethics

“We are all responsible for keeping our ethical compass firmly in place, creating a culture where people can achieve their full potential.”

– Jonas Prising, Chairman & CEO



Why This Matters

Trust and transparency are imperative in the workplace, and as technology continues to disrupt, unprecedented access to data and information brings increasing ethical challenges for organizations to manage. No matter if hiring optimism is at pre-pandemic levels, or global talent shortages persist, a purpose-driven ethical culture is a key differentiator for employees to attract the best talent in ANY work climate.

At the same time, being recognized as a leader in ethical business practices has a direct impact on company value, as reputation has been reported to be responsible for an average of 38% of market capitalization¹. High ethical standards are a differentiator for clients and customers, too – in a world of complex global supply chains, transparency is a baseline 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. We have been recognized by Ethisphere as a World’s Most Ethical Company 14 times— the only company in our industry to be awarded this accolade for more than a decade. 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.



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. The Code is available in over 20 languages, making it accessible to all employees and stakeholders around the world and accommodating our global footprint.

Regular, Realistic and Relevant Training

We expect our employees to uphold our strong values and business practices. All our nearly 30,000 employees globally 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 at work daily. In 2019, we enhanced mobile access to policies and training, making it even easier for our people to stay current with our standards.

We also require our supply chain partners to align their business principles, culture and values with our own commitments to social responsibility and sustainability and affirm their commitment to key practices outlined in our Supplier Code of Conduct.

Up to Date with the Latest Regulations

We regularly refresh training to address emerging risks or changes in regulations. We enhanced our data protection, privacy and cybersecurity training in anticipation of the General Data Protection Regulation (GDPR). We reinforce data privacy and cybersecurity training through frequent campaigns and executive messaging at company-wide, virtual townhall meetings.

In addition, to ensure our innovations build on our strong ethical foundation, in 2021 we convened our Ethical AI Taskforce, led by our General Counsel, Chief Innovation Officer and Chief Information Security Officer, to review and map innovations for the following priorities: data privacy, cyber security, human oversight, explainability, technical robustness and legal accountability.

Open-Door Policy

Promoting ethical work behavior means creating an environment that encourages colleagues and associates to raise ethical concerns without fear of retaliation. Our [Global Ethics Hotline](#) is available 24 hours a day, seven days a week, allowing any employee or third party to raise a business ethics concern. The hotline is available globally, with over 20 languages supported. All reports are reviewed by the Ethics & Compliance Team for action and shared with the Audit Committee of the Board of Directors. 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 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 Matters

In 2018, we completed our first organizational culture audit. This journey in company culture led us to carry out our Cultural Fitness Diagnostic survey in 2021. Spanning our entire organization, this survey helped people directly convey which aspects of our culture were working and which weren't. We identified three cultural ambitions that we believe will enable us to better deliver on our purpose and achieve our business goals:

- **Collaboration:** Working together in an open-minded way, across silos; purposefully seeking diverse thought and nurturing our individual learnability to achieve our goals
- **Anti-Slow:** Empowering our people to make decisions and act quickly; enabling our processes to drive accountability and clarity to deliver efficiencies and desired outcomes
- **Courageous Risk-Taking:** Encouraging healthy debates and accepting failure, not as an excuse for mediocrity, but rather to learn, to test and to adapt fast

Building on this, we launched our Culture Matters initiative to strengthen employee engagement and focus on these cultural ambitions. Thousands of employees across 30 countries have participated in the 2021 rollout, running more than 14,000 “sprints” and “drills” to experiment with the new cultural ambitions and begin building them into daily behaviors.

We believe this work is boosting employee engagement (as MAPS continues to show consistently high levels) and helping us drive even greater impact across the communities in which we operate.

Advocating Ethics on the Global Stage

Through our leadership activity with the WEC, we continually advocate for the role that our industry plays in promoting fair recruitment practices and upholding high standards for employment.

Our strategic partnership with the WEF 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.



Ambitious for Improvement: What's Next?

As we continue to diversify and grow our business, we recognize the importance of transparently sharing 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, likely in favor of individuals, that will define who owns data.

We continue to reinvest and quickly integrate additional growing priorities like cybersecurity. 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.

Note on Performance Data

¹ Percentage of employees answered favorably to all Trusted & Ethical Culture indicators on the ManpowerGroup Annual People Survey.



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