



# DECLARATION OF PRINCIPLE





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## General information

Hays is one of the globally leading personnel service providers for qualified specialists and managers. We bring companies together with specialists and ensure the perfect match.

As a reliable partner, we support specialists throughout their entire career and advise companies on personnel solutions in all types of contracts – from permanent employment to the use of freelancers and temporary staff. In addition, we offer a wide range of consulting solutions such as the outsourcing of recruitment processes (RPO) or the management of external personnel (MSP), making us a strong partner in combating the shortage of skilled labour.

Taking responsibility is what makes this business model so successful: with our sustainable corporate management, we create the framework conditions for equal opportunities in social, ecological and economic terms. We embrace diversity because we see it as a basic prerequisite for our innovation and competitiveness.

With our net zero strategy, we are committed to climate protection – an investment in the future. Thinking about tomorrow's careers today is one of our principles – and the benchmark for aligning the training and further education of our employees and our social commitment. For us, fair behaviour and integrity are the basis of every collaboration – we promote this with our comprehensive compliance management system. Respect for human and environmental rights is a fundamental concern for us – both within the organisation and along the entire supply chain. We therefore expect all companies that have a business relationship with a company or a division of Hays AG and its affiliated companies (hereinafter referred to as "Hays") to base their actions on the same legal and ethical principles.





## 1. Introduction and human rights strategy

Responsible, sustainable and lawful behaviour is one of our core values and is firmly anchored in our corporate strategy and the values of our people strategy. This includes, to the extent applicable to our companies, appropriate compliance with the human rights and environmental due diligence obligations of the Supply Chain Due Diligence Act, so that violations or imminent violations of the following prohibitions are prevented, stopped or minimised (together “human rights and environmental risks”):

- Prohibition of child labour
- Prohibition of forced labour and all forms of slavery
- Disregard for occupational health and safety and work-related health hazards
- Disregard for freedom of association, freedom of unionisation and the right to collective bargaining
- Prohibition of unequal treatment in employment
- Prohibition of withholding an appropriate wage
- Prohibition of an act or omission in breach of duty that goes beyond the above, which is directly capable of impairing a human rights position in a particularly serious manner and the unlawfulness of which is obvious on a reasonable assessment of all the circumstances in question

## 2. Expectations

We expect our employees and suppliers to support us in the best possible to prevent the human rights and environmental risks described in the Supply Chain Due Diligence Act in an appropriate manner and, if necessary, to eliminate or minimise them; this applies in particular to the human rights and environmental risks. In addition, we expect our employees and suppliers to support us in risk management, risk analysis, preventive and corrective measures and the complaints procedure in accordance with the law. This claim is clearly communicated in our code of conduct and our ethics policy and applies to our own business area as well as to the supply chain.

## 3. Risk management

We have a risk management system within the meaning of the Supply Chain Due Diligence Act in place. Our risk management system enables us to identify and minimise human rights and environmental risks. It also allows us to prevent, end or minimise the extent of violations of human rights or environmental obligations if we have caused or contributed to these risks or violations within our supply chain.

Within our business divisions, purchasing, compliance, corporate responsibility and bid management, there are clear responsibilities regarding compliance with human rights and the associated environmental rights, as well as for guiding our due diligence processes in our own business division and through other business partnerships. The purchasing department is responsible for compliance with our due diligence processes in our network of suppliers.

We have also appointed a human rights officer who is responsible for monitoring risk management, among other things.

Our management is informed regularly, at least once a year, about the work of the persons responsible.



When setting up and implementing our risk management system, we have taken appropriate account of the interests of our employees and the employees within our supply chain. The same applies to the interests of all those who may be directly affected in any other way by our business activities or by the business activities of a company in our supply chain in a protected legal position. To this end, we regularly exchange information with our clients and business contacts.

## 4. Risk analysis and priority risks

We carry out annual and ad hoc risk analyses in accordance with the Supply Chain Due Diligence Act with the help of an external service provider. These are based on both historical and daily updated data sources. Evaluations of suppliers are carried out using a 360-degree score and peer group benchmarks. The risk analysis for business partners and partner companies, that are used to provide services in the project via a service contract is carried out using a systematic approach.

Our social compliance team continuously monitors the results of the risk analysis and initiates further measures if necessary.

We proceed as follows in our risk analysis:

- Risk identification:

Our approach is based on systematic data collection and processing to identify human rights and associated environmental risks. To this end, we analyse all direct suppliers based on sustainability-related country and industry key figures that can be used to identify potential violations within the meaning of the Supply Chain Due Diligence Act in our own business area. The effects of a risk are compared with the risk assessment in a so-called risk matrix. Suppliers with a high potential impact and a high-risk assessment are evaluated and prioritised in the matrix.

- Risk analysis and assessment:

Following the survey, the data is analysed using automated red flag screening and 360-degree scoring for all suppliers. We derive possible remedial measures from supplier monitoring and historical screenings as well as from queries and supplier information.

In our risk analyses, we prioritised the following risk categories:

- Human rights
- Labour law
- Health & safety
- Environment

- Prioritisation of risks:

If risks are identified during this overarching assessment, they are reviewed by the social compliance team on a monthly basis.

We then prioritise the risks according to their severity and degree of responsibility. We determine the latter using the appropriateness criteria "influence" and "contribution to causation". The knowledge gained about human rights and environmental risks and impacts is incorporated into our corporate decision-making processes. This applies, for example, to the selection and evaluation of suppliers and business contacts.

The results are also used to adapt internal regulations, processes and trainings accordingly.



## 5. Preventive measures

In order to avoid human rights and environmental risks, we have introduced various preventive measures in our own business area and in relation to suppliers, the effectiveness of which we monitor on an ongoing basis and adjust as necessary.

These preventive measures currently include the following regulations in particular:

- Our Code of Conduct and Ethics Policy. They are binding for our own employees and can be accessed on the intranet at any time.
- Code of Conduct for direct suppliers (available at <https://www.hays.de/personalvermittlung/ueber-hays/verantwortung/lieferkettensorgfaltspflichtengesetz>)
- Diversity Code of Conduct (available on the intranet)

We expect all our employees to adhere to the Code of Conduct and the Code of Ethics.

We are currently developing training courses to regularly train the group of people responsible on the content and due diligence obligations of the Supply Chain Due Diligence Act.

We are assured by our direct suppliers that they comply with the human rights and environmental expectations we demand. To this end, we have a code of conduct for suppliers.

If we become aware of risks, we take appropriate preventive measures towards the responsible party. For example, we carry out control measures, help to prevent risks or join industry-specific or cross-industry initiatives to avoid certain risks. We review the effectiveness of the preventive measures once a year and on an ad hoc basis, particularly if we have to expect a significantly changed or significantly expanded risk situation in our own business area or at suppliers; preventive measures are then adjusted immediately, if necessary.

## 6. Remedial measures

If we identify an actual or imminent violation of human rights or environmental obligations, we take appropriate remedial action without delay. If immediate termination, prevention or minimisation is not possible, we draw up a concept with a specific timetable and implement it.

When creating and implementing the concept, we consider the following points in particular:

- the joint development and implementation of a plan to end or minimise the breach with the company that caused the breach,
- joining forces with other companies as part of industry initiatives and industry standards in order to increase the ability to influence said company,
- a temporary suspension of the business relationship during efforts to minimise risk.

To date, we have not identified any imminent or actual violations of human rights or environmental risks and have therefore not yet had to take any remedial action.





## 7. Complaints procedure

We have set up a Supply Chain Due Diligence Act compliant system for complaints and information on human rights and environmental risks and violations of human rights or environmental obligations arising from our business activities or the business activities of our direct or indirect suppliers. Further information and our anonymous reporting channel can be found at [Whistleblower Protection Act | Hays](#)

Reporting Centre Officer:  
Markus Konrad  
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T. +49 621 1788 1887

## 8. Documentation and report

We document and report in accordance with the Supply Chain Due Diligence Act.

## 9. Update

We regularly update this policy statement and the measures specified therein in accordance with the requirements of the Supply Chain Due Diligence Act.

Imke Mahner, Chief People & Culture Officer Germany and CEMEA  
Alexander Heise, Chief Executive Officer Hays AG

