

Robert Half Canada Inc. - Modern Slavery Report 2023

Modern Slavery Report 2023 Robert Half Canada Inc.



This Modern Slavery Report (the “Report”) addresses the period from January 1, 2023 to December 31, 2023 and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “Act”). This Report is made on behalf of Robert Half Canada Inc. (“RH Canada”, “we”, “us” or “our”). A French version of this Report may be requested from RH Canada by emailing rhcomplianceandethics@roberthalf.com.

1. Introduction

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. RH Canada strives to act ethically and with integrity in all our business dealings and relationships, including implementing policies and procedure with the aim of identifying and preventing forced labour and child labour in our supply chain. This Report sets out the steps we have taken during the fiscal year 2023 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods imported into Canada by RH Canada. We are committed to providing transparency in our business and addressing modern slavery risks in our supply chains, consistent with our disclosure obligations under the Act. We expect the same standards and commitment from our suppliers, contractors and other third parties.

2. Our Business

RH Canada, a company incorporated under the laws of British Columbia, is a provider of talent solutions and business consulting solutions under the Robert Half and Protiviti brands in multiple provinces in Canada. We are a member of the Robert Half corporate group, owned by the ultimate parent company Robert Half Inc. (NYSE: RHI) which has its corporate headquarters operations in Menlo Park and San Ramon, California, USA.

Our branch offices in Canada provide talent solutions for permanent, contract and temporary placements in the following areas:

- Finance & Accounting,
- Creative and Marketing,
- Technology,
- Administrative & Customer Support, and
- Legal.

We also provide consulting and managed solutions in the areas of finance, technology, operations, data, analytics, digital, marketing, legal, HR, governance, risk and internal audit through the Protiviti brand.

Given our industry and operations, we do not have an extensive supply chain network. We do not manufacture goods or handle raw materials.

Our supply chains include, among others: office supplies including stationery; IT hardware and software; cleaning and catering services; advertising and print services; office build out and building maintenance services; and professional services such as those provided by our external financial auditors. Most procurement activities are centralized out of headquarters in the United States and we substantially rely on our parent company, Robert Half Inc., for the purpose of

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managing our supply chain. For example, Robert Half Inc. is our supplier for certain technology and related equipment used by us in Canada. We source our other goods and services primarily from suppliers in Canada and the United States.

3. *Our Policies*

Corporate Governance Policies

Robert Half Inc.'s [Code of Business Conduct and Ethics](#) (the "Code of Conduct") sets out basic principles of ethics and integrity to guide all employees, agents and representatives of the Robert Half corporate group, including RH Canada and its employees, agents and representatives.

Robert Half Inc. has formally set out its position on, and commitment to, human rights for all in its Global Human Rights Policy (the "Global Human Rights Policy"), including its firm stances against human trafficking, human-trafficking related activities, slavery and child labour.

Accordingly, we prohibit:

- using any type of slavery or forced labour in the performance of any work;
- engaging in any form of human trafficking for the performance of any work; and
- destroying, concealing, confiscating or otherwise denying access to any temporary or full-time employee's documents relating to immigration or work authorization issued by any government entity or issuing authority.

We seek relationships with suppliers whose values and principles align with ours.

Robert Half Inc.'s [Supplier Code of Conduct](#) (the "Supplier Code of Conduct") outlines the expectations of suppliers in North America. As a condition to doing business with us, suppliers must comply with the Supplier Code of Conduct, Global Human Rights Policy and Code of Conduct.

Due Diligence and Risk Reduction & Mitigation

We seek to work with suppliers that can meet our business requirements for scale, quality and service levels; bring value through competitive pricing and innovation; and align with our values and principles. We expect third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. To that end, we have embedded responsible business conduct into our policies and management systems. See above *Section 3. Our Policies* for more information on relevant policies and the section below for more information regarding due diligence steps and risk mitigation.

We acknowledge that purchasing goods/services could involve the risk of forced or child labour in our supply chains. In order to mitigate this risk, we have implemented measures including the following:

- In fiscal year 2023, strategic and critical suppliers were assessed on a variety of factors which may include ethics and compliance, business continuity, and environmental, social and governance matters, which include human rights and labour.
- In fiscal year 2023, Robert Half Inc.'s strategic and critical suppliers in the United States were also required to agree to comply with the Supplier Code of Conduct, or provide their own code of conduct or similar document addressing these risks and concerns. During 2024, Robert Half Inc. began applying this requirement to a larger population of new and existing suppliers in the US based on the associated risks and may consider further expanding the scope as appropriate.
- Contractual terms in the majority of our supplier contracts include, as appropriate, contractual obligations on the supplier to comply with all applicable human rights and labour laws and regulations governing the industries and regions in which we and they

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operate and/or termination clauses which may be triggered upon failure to comply or breach of relevant terms.

- Any violation of the provisions of the Global Human Rights Policy with respect to forced or child labour is subject to removal from the contract, reduction in benefits, and/or disciplinary action up to and including termination, subject to applicable law.
- Suppliers, employees or any other concerned parties may report concerns or potential issues using the [Robert Half Ethics and Compliance Online Reporting Tool](#).

4. *Assessing Our Risk*

As a services-based company, we consider our supply chains to be low-risk with respect to modern slavery. Given the nature of our business, we do not have an extensive supply chain network. See above *Section 1. Our Business*. The risk of forced and child labour being present in our supply chains increases in the lower tiers of the supply chain where there may have limited visibility. Nonetheless, we endeavour to manage and limit these risks by engaging suppliers based primarily in the United States and Canada, both of which are reported to have a low prevalence of forced labour, according to the Global Slavery Index. If our due diligence processes establish that risks related to forced and child labour exist, we would conduct further diligence to assess such risk to determine if risk mitigation or remediation is required. We are open to exploring the possibility of implementing additional assessment procedures and mechanisms moving forward.

5. *Our Commitments*

We prohibit our employees, temporary employees, contractors, subcontractors, agents, and vendors from engaging in any form of human trafficking, slavery, or use of child labour in the performance of any work. We expect our suppliers to adhere to these same standards, create and support a sustainable procurement function with regards to environmental, human rights and labour, and business ethics and governance. During 2023, we took a number of steps, including due diligence and other measures, to prevent and reduce risk that forced labour or child labour is used in the production of goods we purchased or imported into Canada as described in *Section 3. Our Policies - Due Diligence and Risk Reduction & Mitigation* above.

Remediation Measures

In 2023, no incidents of forced or child labour were reported within RH Canada. As a result, remediation measures did not need to be taken to correct an incident of modern slavery or to compensate for loss of income to vulnerable families. However, the Code of Conduct, Supplier Code of Conduct, Global Human Rights Policy, and [Robert Half Ethics and Compliance Online Reporting Tool](#) provide a framework for employees to report unethical conduct, including concerns related to forced or child labour.

Training

Every new employee must, upon joining, and all of our employees, annually, are required to complete mandatory training on the Code of Conduct and re-certify that they have read and understand key policies, including the Code of Conduct and Global Human Rights Policy. These trainings include information on how to report misconduct via the [Robert Half Ethics and Compliance Online Reporting Tool](#). As these trainings do not currently include dedicated training on forced and child labour, we may need to assess whether and how the curriculum and materials may require amending or supplementing to better manage our business and supply chain risks related to the potential risks of the use of forced and child labour.

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6. *Our Progress and Effectiveness*

Although we have put in place measures to prevent and reduce the risk of forced and child labour in our business and supply chains, we have not yet implemented a system to assess the effectiveness of these measures. However, if relevant reports or concerns come to our attention through the [Robert Half Ethics and Compliance Online Reporting Tool](#) or other channels, whether from employees, clients, candidates, members of the public, or law enforcement agencies, that information will be reviewed and taken into consideration in the review of our policies and procedures related to forced and child labour, which may include the development and implementation of a system to assess effectiveness, if appropriate.

7. *Approval & Signature*

In accordance with paragraph 11(4)(a) of the Act, this Report was approved by Robert Half Canada Inc.'s Board of Directors on 5/24/2024 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at **www.roberthalf.ca**.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for RH Canada. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Michael C. Buckley

Michael C. Buckley
Director, 5/24/2024

I have the authority to bind **Robert Half Canada Inc.**