

1. Purpose & Applicability

TrueBlue, Inc., on behalf of our subsidiaries and affiliates (“TrueBlue”), is successful because of our commitment to our core values and highest standards of ethical conduct. Ethics and compliance form the foundation of TrueBlue’s global business activities and are at the forefront of every business decision we make and every action we take. This foundation is dependent upon the integrity of not only our team members, but also our business partners.

TrueBlue has provided this Supplier Code of Conduct (the “Code”) to our suppliers as a way to communicate our expectations for ethical and lawful conduct. The Code is a set of fundamental principles. We require our suppliers comply with the contents in the Code, with the letter and spirit of applicable laws and regulation, and to always engage in the highest standards of ethics.

The Code applies to all suppliers and their employees providing products or services to TrueBlue (“Suppliers”). The provisions of this Code are in addition to, not in lieu of, the provisions of any legal agreement or contract between Supplier and TrueBlue. We expect Suppliers to hold their supply chain, including subcontractors and third party labor agencies, to the same standards contained in this Code.

This Code may be amended by TrueBlue from time to time. The enforcement and/or interpretation of the Code rests solely with TrueBlue and does not confer or create any rights in favor of any party other than TrueBlue.

2. Compliance with Laws & Regulations

Suppliers shall comply with all applicable laws and regulations in the jurisdictions and countries in which they operate and/or conduct business with TrueBlue, including but not limited to all applicable laws and regulations concerning:

- ❖ **Labor and Employment** (including wage and hour laws, legally mandated minimum wage and benefits requirements, and employee break and meal periods);
- ❖ **Trade** (including all applicable trade controls and export and import laws);
- ❖ **Fair competition and antitrust;**
- ❖ **Privacy and data protection;**
- ❖ **Environment;** and
- ❖ **Anti-corruption.**

3. Labor Practices & Human Rights

Suppliers shall conduct their activities in a manner that respects human rights, equal opportunity, and complies with all applicable laws, rules and regulations regarding labor, employment, and human rights, including but not limited to:

- ❖ **Involuntary Labor, Human Trafficking, and Slavery.** Suppliers shall not use any form of forced labor, including but not limited to any form of slave, forced, bonded, indentured, or involuntary prison labor. Supplier is prohibited from engaging in or supporting in any form any human trafficking or labor through threat, force, fraud, exploitation or coercion. Work must be voluntary and Supplier employees and workers must be free to leave work and/or terminate their employment upon notice to Supplier.
 - **Modern Slavery Act 2015.** Certain TrueBlue subsidiaries are incorporated in the United Kingdom and procure goods and services from Suppliers in the United Kingdom. Any

Suppliers performing services or supplying goods in the United Kingdom shall: (a) implement due diligence procedures for its own suppliers, subcontractors and participants in its supply chains to ensure there is no slavery or human trafficking in its supply chains; (b) respond promptly to any slavery and human trafficking due diligence questionnaires issued by TrueBlue and ensure the accuracy and completeness of such responses; (c) notify TrueBlue as soon as it becomes aware of any actual or suspected slavery or human trafficking in its supply chain in connection with the services or products provided to TrueBlue. Furthermore, any Suppliers providing goods or services to TrueBlue in the United Kingdom represent and warrant that neither Supplier nor any of its officers or employees have ever been convicted of any offense involving slavery or human trafficking nor been the subject of any investigation, inquiry, or enforcement proceedings by any government, administrative, or regulatory body regarding any offense in connection with slavery or human trafficking.

- ❖ **Child Labor and Minimum Working Ages.** Suppliers shall only engage and employ workers in compliance with all local and national minimum working age laws or regulations. Suppliers shall not use child labor. Suppliers must only employ workers who are the greater of: (a) fifteen (15) years of age; (b) the age for completion of mandatory education; or (c) the minimum age to work in the jurisdiction where work is performed.
- ❖ **Wages and Benefits.** Suppliers shall pay their workers all compensation, and benefits, which meet and comply with all applicable laws.
- ❖ **Workers Right to Documentation.** Suppliers shall ensure their workers have access to work-related documents. Suppliers shall not require workers to surrender any government issued identification, passports, or work permits as a condition of working, and Suppliers shall only temporarily maintain custody over such documents for administrative purposes.
- ❖ **Non-Discrimination.** Suppliers shall not discriminate in any way on the basis of race, color, sex, national origin, gender, gender identity/expression, sexual orientation, religion, disability, age, political opinion, marital/family status pregnancy, veteran status, or other similarly protected factors in Suppliers' hiring, compensation/wage/benefits, training, promotion, or termination decisions or policies.
- ❖ **Non-Harassment and Safe Workplace.** Suppliers shall not engage or permit any (a) harassment, including sexual harassment; (b) physical, verbal, or psychological abuse; or (c) any threats of violence, physical abuse or other forms of intimidation.
- ❖ **Working Hours.** Suppliers shall not allow workers to work more than the maximum hours of daily and weekly labor set by applicable local and national laws and regulations. All overtime shall be voluntary and paid in accordance with applicable laws. Except for emergencies or unique situations, Suppliers shall not require workers to work more than 60 hours in a week (including overtime) and Suppliers shall provide worker at least one day off for every 7 day period.
- ❖ **Employee Records.** Suppliers shall maintain all employment records in compliance with all applicable local and national laws. Supplier shall provide workers with documentation explaining the basis on which workers are paid.
- ❖ **Freedom of Association.** Suppliers shall respect workers' freedom of association and collective bargaining rights in compliance with applicable local and national laws and regulations.

4. Health & Safety

Suppliers shall comply with all applicable workplace health and safety laws and regulations in the jurisdictions in which they operate. Suppliers shall utilize health and safety management policies and practices into its business, including but not limited to policies and practices as applicable that address: compliance with all applicable occupational health and safety laws; providing a safe workplace for

workers; training workers on workplace health and safety; emergency preparedness; industrial hygiene; physically demanding work; machinery safeguarding; sanitation, food, and housing.

5. Ethics & Business Practices

Suppliers shall conduct their business activities with the utmost integrity and ethical practices, including but not limited to:

- ❖ **Anti-Corruption.** Suppliers shall comply with all applicable local and national anti-corruption laws, including but not limited to the United States Foreign Corrupt Practices Act (FCPA) and UK Bribery Act. Suppliers shall not participate in any bribes or kickbacks of any kind in dealing with public officials or individuals in the private sector. Supplier personnel are prohibited from directly or indirectly making, promising, authorizing or offering anything of value to a foreign government official on behalf of TrueBlue to secure an improper advantage, obtain or retain business, or direct business to any other person or entity. This prohibition includes payments to third parties where Supplier personnel know, or should have reason to know, that the third party will use any part of the payment to distribute anything of value to a foreign government official.
- ❖ **Gifts.** TrueBlue policy strictly prohibits actual or potential conflicts of interest stemming from the offer and/or acceptance of gifts, items of value, or personal gain made by any third party to TrueBlue employees and/or their family members in order to secure a business advantage. Suppliers shall avoid giving gifts or anything of value to TrueBlue and its employees in order to obtain or retain an advantage or benefit for the giver, or anything that might appear to influence, compromise judgement or obligate TrueBlue or any of its employees. Supplier shall never offer any gifts in the form of cash or cash equivalents. Suppliers shall never offer, promise, or give any gifts during the vendor selection process or contract negotiations. Any gift, meal or entertainment must be in good taste, in moderation, never harm TrueBlue's reputation, reasonable, proportionate and not extravagant or excessive. Any gift, meal or entertainment must comply with TrueBlue's permissible gift amount policy.
- ❖ **Conflicts of Interest and Disclosure of Risks.** Suppliers shall not deal directly with any TrueBlue employee whose spouse, domestic partner, or other family member or relative holds a significant financial interest in the Supplier. Any transaction with a Supplier that involves a spouse, domestic partner, or other family member or relative of a TrueBlue employee shall comply with TrueBlue's Related Party Transactions Policy.
- ❖ **Insider Trading.** Suppliers' employees, representatives, and agents shall not buy or sell TrueBlue or another company's securities when in possession of information about TrueBlue or another company that is not available to the public and could influence an investor's decision to buy or sell such security.
- ❖ **Accounting and Business Records.** Suppliers shall maintain accurate and honest records and reporting of all business information. Suppliers shall comply with all applicable laws and regulations in its maintenance of accurate, complete, and honest records.

6. Environmental Practices

Suppliers shall commit to protecting the environment and responding to the challenges posed by climate changes, including but not limited to:

- ❖ **Compliance.** Suppliers shall comply with all applicable environmental laws and regulations regarding hazardous material, emissions, and waste/wastewater discharge. Suppliers shall obtain and maintain all necessary environmental permits and registrations. Suppliers shall comply with any environmental reporting obligations required by applicable law.

- ❖ **Reduction of Waste.** Suppliers shall endeavor to use policies and procedures to reduce its waste, water, and energy consumption.
- ❖ **Hazardous Materials.** Suppliers shall identify any hazardous materials or other materials posing a threat to the environment and take the steps to ensure the proper handling, movement, transportation, storage, use, and disposal of such materials.

7. Protection of TrueBlue Assets and Data

Suppliers shall take steps to safeguard TrueBlue's intellectual property and confidential and/or sensitive information, including but not limited to:

- ❖ **Intellectual Property.** Suppliers shall protect the intellectual property ownership rights of TrueBlue in its provision of services or products to TrueBlue. Suppliers shall only use information technology and software that has been legitimately acquired and sourced and which does not infringe on the intellectual property rights of third parties.
- ❖ **Privacy and Data Security.** Suppliers shall comply with TrueBlue's policies and procedures for maintaining confidentiality, privacy, and security when providing TrueBlue with goods or services or when accessing TrueBlue's information technology system, corporate network, architecture, or physical areas.

8. Reporting and Questions

Suppliers are responsible for complying with laws and promptly raising concerns and reporting suspected or actual violations of the law, this Code or any unethical conduct. Suppliers can raise concerns or report suspected or actual violations anonymously, where permitted by law, to TrueBlue's reporting resource, Compliance Alert at www.truebluecompliancealert.com or by phone in the United States and Canada at 855-70-alert. If calling outside the U.S. and Canada, visit www.truebluecompliancealert.com for international dialing instructions.

Suppliers may direct questions or comments about this Code to their supply management representative, TrueBlue's Chief Ethics and Compliance Officer and/or TrueBlue Ethics Office at Ethics@trueblue.com.