

IMPELLAM GROUP

SUPPLIER CODE OF CONDUCT

Date: September 2025

OUR MISSION IS TO BE THE WORLD'S MOST TRUSTED WORKFORCE AND STEM TALENT SOLUTIONS GROUP.

We believe in the power of work.

Through the power of work, we build better businesses and help people lead more fulfilling lives.

At Impellam we are united by one purpose, one culture, one driving force. We call it Virtuosity. It's how we do what we do. It's why we're different. It's our determination to do even more and to always be ambitious and brave for all our stakeholders.

This mission, together with our shared signature practices, gives clear guidance on the behaviors and actions we expect from all the people and organizations that work with Impellam. We choose to engage and partner with like-minded organizations because they recognize people should be treated with dignity and respect.

Impellam Group Limited and its associated companies (www.impellam.com) requires all employees, officers and directors to act responsibly, professionally, and ethically in all business relationships. To that end, Impellam has adopted this Supplier Code of Conduct which applies to all our suppliers and stakeholders.

Suppliers represent a critical component of Impellam's performance and value proposition. As our relationship grows and matures with certain suppliers, we expect our suppliers to evolve to better fit our enterprise. Suppliers that cannot or will not adhere to this Supplier Code of Conduct must immediately advise Impellam and may be disqualified as an Impellam supplier.

POLICY STATEMENT

Key principles of this Code of Conduct include the following:

- complying with all applicable laws, rules, and company policies;
- avoiding actual and apparent conflicts of interest;
- maintaining confidentiality of non-public information;
- keeping accurate records;
- dealing fairly with the competition and suppliers;
- continually striving to maintain a discrimination and harassment free environment.

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COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Suppliers must comply with all applicable laws, rules, and regulations of the places where they do business which may include, but are not limited to, the Criminal Finances Act 2017, the Modern Slavery Act 2015, the Data Protection Act 2018 and the Bribery Act

2010. If any law, rule or regulation conflicts with this Supplier Code of Conduct, the Supplier should bring such conflict to the attention of Impellam.

HEALTH AND SAFETY

Suppliers must be committed to provide safe working conditions and a healthy work environment. Suppliers must act with care and respect for both the environment and the people who live in the communities where they conduct business. Suppliers must follow all applicable safety, health and environment laws, regulations, rules and practices, including providing a workplace free from violence and the influence of illegal drugs or alcohol.

ENVIRONMENT

Suppliers should have a clear environmental and sustainability strategy in line with the Sustainable Development Goals (SDGs). Impellam is committed to achieving Net Zero by 2045 and encourages its suppliers to be equally ambitious and set emission reduction targets (both near term and long term) aligned to the Science-Based Targets Initiative (SBTi) which includes scope 3 emissions targets.

Suppliers are advised to:

- Calculate their GHG emissions on an annual basis (covering Scope 1, 2 and 3) in accordance with the GHG Protocol Methodology.
- Implement reasonable measures to reduce their carbon footprint across their operations.
- Provide annual reports to Impellam, upon request, detailing their total annual GHG emissions, and progress towards achieving identified sustainability and decarbonisation targets. Use natural resources efficiently and work to reduce their consumption of water, electricity, land, and raw materials.
- Promote the use of renewable energy and sustainable resources wherever feasible
- Embrace circular economy principles including reusing, recycling, and reducing waste.

Suppliers are reminded to comply with all applicable environmental and sustainability laws and regulations including those related to greenhouse gas emissions and reporting requirements.

Impellam may offer suppliers training or workshops on sustainability topics from time to time. Suppliers are encouraged to take part in them.

Finally, Impellam encourages its suppliers to uphold similar sustainability and environmental standards within their own supply chains and to incorporate sustainability criteria into their procurement policies.

BUSINESS ENTERTAINMENT AND GIFTS

Suppliers may use lawful, legitimate and reasonable business entertainment and gifts for the purpose of creating goodwill and sound working relationships, not to gain unfair

advantage. However, depending upon circumstances, Suppliers that provide business entertainment or gifts deemed inappropriate may be disqualified as Impellam supplier. Supplier's may not make facilitation payments or make gifts on behalf of Impellam. No Impellam employee or family member may offer, give, or accept any gift or entertainment unless it:

- Is a noncash gift;
- Is consistent with customary business practices;
- Is not excessive in value;
- Cannot be construed as a bribe or payoff;
- Does not violate any laws or regulations.
- Properly reported in accordance with the Impellam procedure on Gifts & Hospitality

CONFLICTS OF INTEREST

Suppliers and their employees must avoid creating actual or apparent conflicts of interest. Conflicts of interest can arise when a supplier takes an action or has an interest that may make it difficult for the supplier to engage in legitimate business transactions. Conflicts of interest also arise when a supplier, a supplier's employee, or a member of his or her family, attempts to obtain improper access to Impellam or personal benefits (including loans, guarantees of obligations or acquisitions of interests in transactions involving Impellam or its clients or suppliers) as a result of his or her position with the supplier. If you believe that a transaction, relationship, or other circumstance creates or may create a conflict of interest, you should promptly report this concern to Impellam.

RECORD KEEPING

Suppliers must accurately record and report information in order to make responsible business decisions. All business expenses should be documented accurately, and books, records, accounts, and financial statements should be maintained in reasonable detail, appropriately reflect transactions with Impellam, and conform both to applicable legal requirements and to its system of internal controls.

COMPETITION AND FAIR DEALING

Suppliers must deal fairly with Impellam's clients, suppliers, competitors and employees. Suppliers must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or any other unfair practice. Suppliers must not engage in unethical or illegal business practices such as stealing proprietary information, misrepresenting important facts, possessing or using trade secret information that was obtained without the owner's consent, or inducing disclosure of this type of information by past or present employees of other companies.

DISCRIMINATION AND HARASSMENT

Suppliers must refrain from all forms of unlawful discrimination in the conduct of its business. Suppliers shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, union membership, or marital status in hiring and employment practices such as promoting, rewards, and access to training.

Impellam will not tolerate harassment or bullying or sexual harassment in any form towards its people. Suppliers should implement policies and procedures to ensure they are taking reasonable steps to prevent harassment or bullying or sexual harassment of both their own personnel and those individuals their personnel interact with – including Impellam staff.

CONFIDENTIALITY

Suppliers must strictly adhere to all confidentiality obligations. Confidential information includes proprietary information such as trade secrets, know-how, business and marketing plans, sales forecasts, engineering and manufacturing ideas, designs, innovations, databases, records, supply chain information, salary information, and unpublished financial data and reports, as well as any non-public information that might be of use to competitors or harmful to Impellam or its clients if disclosed. Suppliers must ensure the confidentiality of confidential information continues even after the supplier / customer relationship ends.

MANAGEMENT OF SUB-SUPPLIERS

Suppliers must manage their sub-tier suppliers in accordance with the same principles outlined in this Supplier Code of Conduct.

SUPPLIER DIVERSITY

Supplier diversity is a very important part of Impellam's business strategy. It is a part of our business process which seeks to diversify our supply base. Our focus is on enhancing a corporate supply chain that reflects the diversity of the communities in which we work. At Impellam, developing mutually beneficial business relationships that produce value to our company and our clients is paramount to our success. We encourage our suppliers to identify and develop qualified and capable minority and small disadvantaged businesses. Our client base includes entities that require this as a condition of doing business and therefore Impellam expects suppliers to be aware of and to promote this initiative wherever feasible.

LABOUR AND HUMAN RIGHTS

Impellam's suppliers must have the highest legal and ethical standards in dealing with employees and workforce ("Workers"). All suppliers will warrant that they have implemented systems and controls aimed at ensuring compliance to the Modern Slavery Act 2015 or other similar applicable legislation and specifically:

- Workers shall not be subject to forced, prison, bonded, indentured, slave, trafficked or compulsory labor in any form, including forced overtime. All work must be carried out voluntarily.
- Workers and their families with them shall not be subject to harsh or inhumane treatment, including but not limited to physical punishment, physical, psychological or sexual violence or coercion, verbal abuse, harassment or intimidation.
- Workers must have the right to terminate their employment freely, subject to a reasonable period of notice in accordance with the applicable laws and collective agreements and without any improper penalties.
- Workers shall not have their identity or travel permits, passports or other official documents or any other valuable items confiscated or withheld as a

condition of engagement and the withholding of property shall not be used directly or indirectly to restrict Workers' freedoms or create workplace slavery.

- Fees or costs associated with the recruitment of Workers (including but not limited to fees related to work visas, travel costs and document processing costs) shall not be charged to workers whether directly or indirectly. Similarly, Workers shall not be required to make payments which have the intent or effect of creating workplace slavery, including security payments, or be required to repay debt through work.
- Wages should be paid regularly and directly to the Worker and in legal tender.
- There shall be no use of child labor even when local customs permit such practices. If Workers under the age of 18 are permitted and engaged then particular care should be taken as to the duties they carry out and the conditions which they are required to work to ensure that they come to no physical, mental or other harm as a direct or indirect result of their work or working conditions.
- Workers shall be free to move without restrictions and shall not be physically confined to the place of work or other supplier controlled locations (for example accommodation blocks). There shall be no requirement on Workers that they take accommodation in a Supplier controlled premises.
- Workers shall be free to file grievances or complaints to the supplier about the supplier's treatment of them and Workers shall not suffer detriment, retaliation or victimization for having raised a grievance or complaint.
- Suppliers shall ensure that a system is put in place to ensure Workers are able to confidentially report any concerns to the supplier.

REPORTING

Impellam will require suppliers to confirm compliance to this Supplier Code of Conduct in writing and suppliers will respond to this promptly and honestly.

If you have any concerns about a breach of this Supplier Code of Conduct you may report this on a confidential basis to your local Impellam Group Legal team or either legal@impellam.com or legalrequest.US@impellam.com.

IMPELLAM'S COMMITMENT TO SUPPLIERS

Impellam promises to adhere to its own Code of Conduct in its dealings with suppliers. For those suppliers who meet the high standards required to become an Impellam supplier, we request your co-operation to mutually hold each other accountable. Impellam wants to be recognised as your customer of choice and welcomes open and honest feedback.

If you have any questions regarding this document contact your local Impellam Group Legal team or either legal@impellam.com or legalrequest.US@impellam.com.