

## **Purpose**

TrueBlue, Inc. and its subsidiaries worldwide (“TrueBlue”) are committed to a work environment free from human trafficking, forced or compulsory labor, unlawful child labor, or slavery (“human trafficking”). TrueBlue will not tolerate human trafficking in any part of our organization or within our supply chain. The Company upholds the United Nations Global Compact Principle 4, the elimination of forced and compulsory labor, and Principle 5, the abolition of child labor. This policy complies with the U.S. Federal Acquisition Regulations (“FAR”) sections concerning Combatting Trafficking in Persons, the U.K. Modern Slavery Act 2015, and Australia Modern Slavery Act 2018.

## **Application**

This policy applies to everyone at TrueBlue including the members of the Board of Directors and all officers, employees, and associates of TrueBlue and its subsidiaries worldwide (“employees”). This policy also applies to the Company’s third parties, including independent contractors, consultants, agents, vendors, suppliers, intermediaries, joint venture partners, and any other business partners acting on TrueBlue’s behalf (“third parties”).

## **Requirements**

Employees and third parties must not engage in any practice that constitutes human trafficking. This requirement includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons, requiring forced labor or coercing any individual to perform any work.
- Procuring commercial sex acts in the performance of any work.
- Unlawfully recruiting and transporting people from other countries to work in the U.S.
- Destroying, concealing, confiscating, or otherwise denying access by an individual to that individual’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions, such as failing to disclose basic information in a format and language accessible to the potential candidate, or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided by TrueBlue), any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work.
- Using third party recruitment companies or agents that do not comply with local labor laws of the country in which the recruiting takes place.
- Charging applicants/candidates recruitment fees.
- Prohibiting employees from leaving their employment.
- If required by law or contract, failing to provide:
  - return transportation or failing to pay for the cost of return transportation upon the end of employment;
  - housing arrangements that meets the host country’s housing and safety standards;
  - an employment contract, recruitment agreement, or other required work document in writing.

### **Prohibition of Child Labor**

TrueBlue, Inc. complies with all relevant and applicable local, state, federal, and international labor regulations, treaties, conventions, and principles relating to the protection, welfare, and health and safety of children. It is Company policy to not employ minors under the age of 18, regardless of the type of position. Should a situation arise where an exception to this policy is needed, it must be reviewed and approved by the Legal Department.

In no circumstance, will employment of a minor be permitted in a dangerous job as defined by the U.S. Fair Labor Standards Act (FLSA) and its regulations. In all circumstances, employment must comply with all applicable regulations and federal, state, and local laws. Additional information about these laws and regulations can be found at the US Department of Labor website: [Child Labor](#) and [What jobs are off-limits for kids](#).

As a good corporate citizen, the Company is committed to the principle of protecting children and youth from child labor exploitation. The Company believes the future development of children and of the communities and countries in which they live is best served through education, not child labor.

### **Third Parties**

TrueBlue's Anti-Human Trafficking, Child Labor, and Modern Slavery Policy applies to all vendors and third parties we do business with. In the United States, the Form I-9 and supporting documents accepted by vendors, including those that validate age, must comply with the US Department of Homeland Security Record Retention and Destruction rules and regulations.

Third Parties:

- Shall not employ any children under the age of 15 or otherwise in violation of applicable law regarding the employment of children.
- Must work in close collaboration with a TrueBlue representative to ensure the needs of children and/or youth are a top priority.

The Company reserves the right to terminate business relationships, contractual agreements, and purchase orders of any third party who violates this policy.

### **Employees**

Employees of TrueBlue who violate any part of this policy will be subject to disciplinary action up to and including termination.

### **Due Diligence**

TrueBlue has undertaken actions and is committed to maintaining and improving its systems and processes to eradicate human trafficking in its supply chains. As part of that initiative, the Company employs a tailored due diligence process intended to:

- Identify, assess, and mitigate potential risk areas in our supply chains.
- Communicate the policy to employees and third parties and provide risk-based training.
- Implement controls, including contractual provisions flowing down supply chains, and certification of compliance.
- Monitor potential risk areas.
- Protect whistleblowers.

If children and/or youth labor is found at TrueBlue and/or its vendors, the following actions will be taken:

- The child and/or youth will be removed from the workplace and offered a viable alternative if a viable option is available. Emergency child labor intervention will be made in the best interests of the child and/or youth and ensure the child and/or youth is not forced into another child labor working environment.
- All efforts will be made to return the child and/or youth to school.
- Compensation will be provided to the child and/or youth for time spent working.

### **Audits**

TrueBlue performs investigations and audits of our own employees and third parties (as needed) to verify business is conducted in compliance with this policy. All employees and third parties that TrueBlue conducts business with are required to fully and promptly cooperate with TrueBlue's internal and external counsel, auditors, and investigators. It is expected that all employees and third parties respond fully and truthfully to questions, requests for information, and documents. Third parties must be able to demonstrate compliance with this policy when requested and to the satisfaction of TrueBlue.

### **Violations**

TrueBlue takes any allegation of a policy violation seriously and takes prompt and immediate action to conduct an investigation. Any TrueBlue employee found to be in violation of this policy will face discipline, up to and including termination in accordance with applicable law. Any third party found to engage in prohibited practices may face termination of the business relationship and prosecution.

### **Responsibility & Reporting**

Questions about this policy should be directed to TrueBlue's Chief Ethics and Compliance Officer at [ethics@trueblue.com](mailto:ethics@trueblue.com).

Our "Be True" value reflects the Company's commitment to ensuring ethics are at the center of the way we work. All employees must model Be True by immediately raising human trafficking concerns and reporting any suspected or actual violation of this policy through the following reporting channels:

- ComplianceALERT (anonymously) at [www.truebluecompliancealert.com](http://www.truebluecompliancealert.com) by marking the appropriate area of concern, or by phone in the U.S. and Canada at 855-70-ALERT. International callers should dial 001-855-70-25378.
- Chief Ethics and Compliance Officer
- General Counsel

### **No Retaliation**

The Company has an open-door philosophy to ensure that anyone who brings forward concerns, or assists, participates, or testifies in an investigation will be free from retaliation or other detrimental action. Any reprisal against any company representative for reporting a suspected violation, in good faith, is strictly forbidden. Accordingly, the Company will strictly discipline, up to and including termination, any employee who retaliates against another for bringing forward information or participating in an investigation or audit. For more information on the Company's commitment to anti-retaliation and open-door philosophies, see TrueBlue's [Anti-Retaliation Policy](#).

### **Questions**

For questions about this policy, contact iComply via [my service center](#).

### **Policy Criteria:**

Brief Policy Description: This policy outlines the company's position on child and youth labor.

Effective Date: December 21, 2023

Applies to: TrueBlue and its subsidiary employees worldwide; TrueBlue clients and customers.