



Supplier Code of Conduct



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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 to communicate our expectations for ethical and lawful conduct. The Code is a set of fundamental principles. We require our suppliers to 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 require Suppliers to hold their supply chain to the same standards contained in this Code. As such, this Code applies to any third-party subcontractors, labor agencies, agents, consultants, or other entities engaged in the performance of services or delivery of products to TrueBlue on Supplier's behalf ("Subcontractors"). Any reference to "Suppliers" below shall be deemed to include and refer to any Supplier Subcontractors performing services or products to TrueBlue on Supplier's behalf.

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.

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
- Anti-corruption

Labor Practices & Human Rights

Suppliers shall comply with all applicable laws, rules and regulations regarding labor, employment, and human rights, including but not limited to:

- **Ethical Recruitment and Hiring Practices.** Suppliers shall ensure that all recruitment and hiring of workers—whether conducted directly or through Subcontractors—is performed ethically, transparently, and in compliance with all applicable laws, international labor standards, and this Code. Such ethical recruitment and hiring practices include: (a) prohibition against any recruitment fees or costs as a condition of employment; (b) transparent and accurate hiring practices explaining scope of employment; and (c) strict prohibition against false promises, misrepresentation, or deceptive recruiting practices.
- **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. Suppliers shall conduct all necessary ongoing due diligence to identify, prevent, mitigate, and address actual or potential adverse human rights associates with their operations, supply chain, Subcontractors, or business partners.
- **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.
- **Mechanism for Worker Complaints.** Suppliers shall provide accessible, confidential, and nonretaliatory grievance mechanisms for workers, employees, and supply chain workers (including any Subcontractor workers) to raise concerns regarding labor rights, human rights abuses, unethical conduct, and violations of applicable law or any subject matters under this Code. Grievance channels must be culturally appropriate, clearly communicated, and allow for anonymous reporting where permitted by law. Supplier shall take prompt corrective action to address any complaints or grievances submitted by workers or employees.

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.

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.

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 their 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.

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. Suppliers shall maintain robust data protection and cybersecurity practices and implement and maintain necessary administrative, technical, and physical controls to safeguard TrueBlue information, systems, and assets from unauthorized access, loss, misuse, or disclosure, including but not limited to implementation of strong access controls, encryption of data in-transit and at-rest, protection against cyber threats, and robust incident reporting mechanisms in the event of an incident involving TrueBlue data, assets, or information. At TrueBlue's request, Supplier shall provide reasonable documentation describing security policies and controls, participate in security assessments or questions, and remediate identified gaps or risks.
- **Responsible Use of Artificial Intelligence ("AI").** Suppliers providing AI to TrueBlue and/or utilizing AI in their provision of other services or products to TrueBlue shall ensure any use of AI is ethical, transparent, and compliant with all legal requirements and TrueBlue policies. This includes but is not limited to ensuring development, design, implementation, or use of AI promotes fairness and non-discrimination, allows for human oversight and intervention,

incorporates necessary data privacy and security controls, and is transparent, reliable, and explainable.

Supply Chain and Use of Subcontractors

Suppliers shall ensure any Subcontractors acknowledge and comply with this Code or with standards that meet or exceed the requirements herein. Depending upon the terms of the legal agreement between TrueBlue and Supplier, Supplier may be required to provide written notice to TrueBlue before engaging Subcontractors or materially changing subcontracting arrangements related to TrueBlue. Supplier shall conduct all reasonable and ongoing due diligence to assess Subcontractor compliance with the practices required under this Code and take prompt corrective actions as identified. Supplier shall only engage Subcontractors that are properly licensed and authorized to provide goods or services under applicable law and uphold all requirements in this Code. Suppliers remain responsible and liable for the actions, conduct, and omissions of their Subcontractors in connection with TrueBlue business.

Audit Rights

TrueBlue reserves the right to verify Supplier compliance with this Code through assessments, audits, and monitoring activities. Suppliers shall cooperate fully with any TrueBlue inquiry regarding any obligations outlined in this Code. Upon request, Suppliers shall provide TrueBlue with reasonable access to documents, records, policies, training materials, certifications, or other information necessary to evaluate compliance with this Code. TrueBlue may conduct onsite audits, virtual assessments, worker interviews, or facility visits directly or through an authorized third party. Audits may include inspections of workspaces, subcontractor facilities, housing, documentation, or any relevant area connected to the provision of goods or services. Suppliers shall cooperate with TrueBlue investigations into potential misconduct, including promptly responding to inquiries, making relevant personnel available for interviews, and supplying requested documentation in a timely manner. Suppliers shall ensure that Subcontractors, labor brokers, and affiliated entities participating in TrueBlue work reasonably cooperate with TrueBlue audits and assessments. If noncompliance is identified, Suppliers must promptly create, implement, and complete a corrective action plan acceptable to TrueBlue. Corrective actions may include training, process improvements, restructuring of subcontractor relationships, policy revisions, or other measures necessary to remediate issues. Failure to comply with this Code, refusal to participate in audits, falsification of information, or failure to remediate identified issues may result in corrective actions up to and including: suspension of work; withholding of payments; termination of the supplier relationship, and/or reporting to regulatory authorities where required by law.

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.

Anti-Retaliation and Reporting

TrueBlue strictly prohibits any retaliation against employees who:

- report in good faith a concern or complaint,
- participate in an investigation,
- refuse to participate in suspected improper or unlawful activity, or
- exercise workplace rights protected by law.

At TrueBlue, we value doing what is right. Every employee is asked to live our core values and demonstrate ethical and legal conduct every day and in every action. If you ever need to report misconduct or violations of our Code or policies, visit our Reporting page to see all the ways you can report.

Policy Criteria

Brief Policy Description: Supplier Code of Conduct

Last Updated: April 2026

Applies to: Third Party Suppliers