



U.S. Foreign Corrupt Practices Act Guidelines and Global Anti-Corruption Policy

Ethics and integrity have been core values for Robert Half Inc. and its subsidiaries (“Robert Half” or the “Company”) since our founding. The Company remains committed to conducting business in accordance with the highest ethical standards. As part of this commitment, Robert Half complies with applicable anti-corruption and anti-bribery laws – including the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act 2010, and other laws and regulations in the countries where we conduct business.

This Policy requires compliance with applicable anti-corruption laws and applies to the Company and all of our officers, directors, and employees wherever we do business. This Policy also applies to vendors and suppliers, third-party consultants, agents, and representatives while conducting business with us or on our behalf globally.

It is against this Policy to offer, promise, authorize, receive, or pay Anything of Value to or from any Government Official or any private party, whether given directly or indirectly through third parties, with the intent to influence any action or decision in order to gain or retain an improper advantage. This includes commercial bribery and kickbacks. The term “Anything of Value” is broadly interpreted, and can include cash or cash equivalents, gifts, travel, entertainment, political contributions, charitable donations, employment offers, or other favors. This Policy also prohibits facilitation payments. Facilitation payments are a form of bribe where cash or cash equivalents, gifts, favors, goods or services are given to a Government Official to perform or expedite the performance of an existing duty (like the processing of a local permit, visa or supplying utilities).

The term “Government Official” includes a broad range of persons, and includes (but is not limited to):

1. any employee or agent of a government or any of its agencies or departments
2. any employee or agent of a government-owned or controlled business or organization
3. any political party
4. any employee or agent of a political party
5. any political candidate
6. any employee or agent of a public international organization (such as the World Bank, European Union, International Monetary Fund, or the United Nations), and
7. family members or any other third party designated by or acting on behalf of any of the above.

Routine business lunches of reasonable value and other similar practices where items of nominal value are given to or received from a Government Official or private party that are not intended to induce the recipient to misuse his or her position are permitted, provided such conduct otherwise complies with the Company’s policies, applicable law, and appropriate practices. If you have any questions about how this Policy may apply to you or to any situation you may be facing, please contact the Robert Half Ethics and Compliance Online Reporting Tool at roberthalfethicsline.com.

As a U.S. public company, the Company must also comply with the FCPA’s accounting provisions. These provisions of the FCPA require the Company to:

(1) maintain accurate and reasonably detailed books, records, and accounts (the “books and records provisions”), and

(2) adopt and maintain a system of internal accounting controls reasonably designed to prevent violations of the FCPA.

The FCPA’s accounting provisions apply even in the absence of corrupt payments. Accordingly, any alteration or falsification of corporate documents or books and records, or the creation of misleading entries, is strictly prohibited.

Any violation of this Policy or of any applicable anti-corruption or similar laws may result in significant civil or criminal penalties against the Company and against you, either under the FCPA (which applies to conduct outside the United States) or under the local laws in the country where the conduct took place. Any such violations may also result in disciplinary action, up to and including termination.

If you have any questions about this Policy or are unsure about how it may apply to you or to any situation you may be facing, please contact Robert Half’s Legal Department immediately or contact the Robert Half Ethics and Compliance Online Reporting Tool at roberthalfethicsline.com or from North America, call **1.800.251.4621**.

The Company will not tolerate direct or indirect retaliation, in any form, against an individual for making a good faith report of potential or actual misconduct or violation of this Policy.

COUNTRY-SPECIFIC TOLL-FREE NUMBERS

COUNTRY	HOTLINE NUMBER
Australia	1.800.764.392
Austria*	0800.281734
Belgium*	0800.708.64
Brazil	0.800.591.1307
Bulgaria	0800.46055
Canada	1.800.251.4621
Chile	800.914.044
China	400.120.3145
France*	0805.080313
Germany*	0800.183.0550
Hong Kong	800.962.233
India	000.800.050.1471
Ireland*	1800.904.177
Italy*	800.727.419
Japan	0800.222.1142
Luxembourg*	800.2.2992
Netherlands*	0.800.023.4122
New Zealand	0800.746305
Singapore	800.492.2392
Switzerland*	0800.836.911
United Arab Emirates	8000.3205.17
United Kingdom*	0.800.086.8406
United States	1.800.251.4621

* Employees in these countries should refer to the guidelines contained in their country's Whistleblowing Policy concerning the reporting of unethical or illegal conduct; the guidelines contained in that notice will prevail if in conflict with any instructions in this document.

If your country is not listed above, please use the following internationally accessible hotline number (please note that callers in some countries must first dial a country-specific direct access code and long-distance charges may apply): +1-720-514-4400.

roberthalf.com

