



trueblue
THE PEOPLE COMPANY®

The Code

TrueBlue's Global Code of Conduct and Business Ethics

peopleready
A TRUEBLUE COMPANY

peoplemanagement
A DIVISION OF TRUEBLUE

peoplescout
A TRUEBLUE COMPANY

Table of Contents

Page

A Message from Taryn Owen 3

Our Mission, Vision and Values 4

Who We Are 4

Our Code 5

Commit to Our Culture 6
- It Starts with the Code 7
- Let Our Code Guide Your Decisions 8
- Report Concerns 9
- Other Reporting Options 10
- Respond to Investigations 11
- Do Not Retaliate 12
- Manage with Integrity 13

Commit to Each Other 14
- Foster Diversity and Inclusion 15
- Prevent Discrimination and Harassment 16
- Sexual Harassment 17
- Guard Against Workplace Violence 18
- Prohibit Substance Abuse 19
- Promote Employee Health and Safety 19
- Avoid Conflicts of Interest 19
- Disclosure and Resolution 20

Page

Commit to Protecting Our Company 21
- Build Responsible Third Party Relationships 22
- Watch for Fraud, Theft, and Dishonesty 22
- Protect Against Bribery and Corruption 24
- Exchange Appropriate Third Party Gifts, Meals, Entertainment, or Travel 25
- Be an Accounting and Recordkeeping Guardian 26
- Shield Company Confidential and Proprietary Information 27
- Protect Personal Information, Privacy, and Security 28
- Safeguard Assets 29

Commit to Respecting the Law 30
- Respect Laws Around the World 31
- Avoid Trading on Inside Information 32
- Compete Fairly 32
- Uphold Labor and Employment Laws 33
- Involvement in Political Activities and Charitable Contributions 34

Commit to Being a Force for Good in Our Communities 35
- Strive for Social and Environmental Responsibilities 36
- Respect Human Rights 36
- Use Good Judgement with Communications 37

Resources 38







< Back to contents

A Message from Taryn Owen



At TrueBlue, we are fortunate to enjoy a positive reputation in our industry. We have an unwavering commitment to our mission of connecting people and work, and we hold ourselves and one another accountable for our Company values.

We operate with the highest standards for ethical behavior to achieve our vision of being the leading provider of talent solutions for the changing world of work. Our determination to be ethical and legally compliant is at the core of every TrueBlue business decision and action. This commitment includes:

- Being equitable and honest.
- Doing the right thing.
- Being a values-driven organization that is optimistic, passionate, accountable, respectful, and true.

It is empowering to know we will not compromise our commitment to ethical and legally compliant practices under any circumstances. We are personally accountable for complying with and championing our ethical standards and Code of Conduct. Our commitment and accountability goes well beyond simply following laws and regulations. We strive to meet our standards for how we treat each other, stand by our zero-tolerance policies, and always report violations.

TrueBlue's reputation and the trust and confidence of our stakeholders are crucial to our continued success. **We ask that you carefully read our Code of Conduct and take time to reflect on the principles it sets out. Please keep our Code handy and refer to it often for guidance.**

Thank you!



Taryn Owen
President and CEO

< Back to contents

Who We Are

Since our first office opened in 1989, TrueBlue has been dedicated to putting people to work and helping change lives. As the world of work changes, so does our business, but we remain committed to providing clients around the globe with a talented workforce.

Today, TrueBlue is a leading provider of specialized workforce solutions with three business divisions – PeopleReady, PeopleManagement, and PeopleScout – that help our clients grow and improve performance by providing staffing, workforce management, and recruitment process outsourcing solutions.

Living our values, remaining committed to the highest standards of ethics and integrity, and staying true to our mission brought us to where we are today and continues to be essential to our success as The People Company.



Our Mission

We connect people and work.

Our Vision

To be the talent solution for the changing world of work.

Our Values

Be Accountable:	We empower our people to take personal responsibility and have an impact.
Be Optimistic:	We believe there is a solution to every problem. We are innovative, discovering new ways to get results.
Be Passionate:	We are passionately committed to doing good and will go above and beyond.
Be Respectful:	We listen and learn from each other and embrace our diverse views and experiences.
Be True:	We are true to who we are and what our clients need.

< Back to contents

Our Code

Our Code provides a framework for understanding our core values and a roadmap for making the right ethical choices. At TrueBlue we believe in living our Code. Living our Code means that we are committed to our culture, each other, protecting our company, respecting the law, and being a force for good in our communities.

At TrueBlue, we strive to not only understand our written Code of Conduct but live our Code and our core values every day. Our employees, clients, shareholders, and the communities we serve rely on us to do what is right. This means we commit to operating as an ethically responsible and trustworthy company at all times. It is a responsibility we proudly accept.



Commit to Our Culture



Commit to Our Culture

We live our Code by building and nurturing a culture where we do the right thing and act with integrity at all times. That means we keep the Code and our values top of mind in our daily work and in each decision at every level.

It Starts with the Code

Each one of us, through our words and actions creates our Company culture. Our Code is our tool to help ensure we are operating to the highest ethical standards so that our company can continue to thrive as an ethically responsible and trustworthy company.

Every day, in everything you do, our Code sets the foundation for our culture and:

- **INSPIRES you, your colleagues, your managers, and your leaders to do the right thing. When you feel inspired, you work hard to do what is best for our company and protect our reputation.**
- **EMPOWERS you to feel comfortable speaking up when something does not seem right. When you feel empowered, you are more likely to recognize risks and alert others to possible problems.**
- **GUIDES you toward the right decisions. When you follow trusted guidance, you are confident that the decisions you make are right for you and our company.**

As a TrueBlue employee, you are responsible for reading, understanding, and following our Code and knowing how it supports our values. You must also commit to reviewing and following all policies as well as laws and regulations that relate to our business. If you fail to meet these commitments, you place our reputation at risk and expose TrueBlue to civil and criminal liability, fines, penalties, and damages.



Let Our Code Guide Your Decisions

Our Code provides a framework for understanding our core values and a roadmap for making the ethical and compliant decisions each of us face on a day-to-day basis. When you make good decisions, you build trust. When colleagues, clients, and associates trust you, you help our business grow.

Making good decisions, however, is not always straightforward. Many situations are complex and uncertain. You may find that an ethically correct decision may negatively impact business. When you face challenging decisions, turn to our Code. While it is not possible to have a specific rule for every problem, our Code along with our values and policies provide guidance and direction.

When you are unsure of the best decision, remember to Pause, Consider, and Act.



Pause | Consider | Act

PAUSE – Ask yourself:

- What about the situation creates uncertainty?
- What red flags signal potential risk?
- Is it legal?
- Is it ethical?
- What would my colleagues and clients think in this situation?

CONSIDER – Weigh your options.

- Which decision best aligns with our values, Code, and Company policies?
- How will any potential decisions reflect on myself and our Company?
- How will any potential decision affect our culture, colleagues, Company, and communities?
- Which decision am I willing to be held accountable for?

ACT – Take the best next step.

- Your action may include discussions with managers, changing behavior, holding others accountable, or reporting.
- If needed, decide who you should partner with.
- Ask for help or talk to a trusted partner.
- Double check that your decision is ethical and based on our values, policies, and Code.

< Back to contents

Report Concerns

Each of us is responsible to speak up and raise concerns in good faith when we suspect or when we become aware of unethical conduct or Code violations in the workplace. Early identification and resolution of ethical issues is critical to keeping our commitments to each other, key stakeholders, third parties, regulators and the communities in which we live and work.

Good faith reporting means you have a sincere belief that:

- unethical conduct happened or is happening;
- the conduct may be a violation of the law, our Code, or Company policies; and
- your report presents information about the event in a true and honest manner.

We encourage and appreciate all reports made in good faith; they are protected under the law. We take all reports of suspected violations and unethical behavior seriously. Reports made in bad faith may result in disciplinary action up to and including termination.

Remember, if you see something, say something. You must report violations of the law, our Code, and our Company policies. It is against Company policy to discriminate or retaliate against someone who makes a report in good faith. You can always report to your manager, upline VP, or Human Resources. If you're not comfortable with those options, or don't feel they resolved your concern, you can also report to the Chief Ethics and Compliance Officer, General Counsel, Internal Audit, or through our ComplianceALERT hotline.



ComplianceALERT Hotline

ComplianceALERT is available to all employees, clients, third parties, or shareholders who want to raise concerns. Where allowed by the law of your country, your report may be made anonymously or directly to your local management.

ComplianceALERT is operated by an independent third party. It is staffed by experienced professionals and is available 24 hours a day, seven days a week. You can report to ComplianceALERT via a web portal at www.truebluecompliancealert.com or by phone in the United States and Canada at 855-70-ALERT. International callers should check the ComplianceALERT website for country specific dialing instructions.

Other Reporting Options

Talk to your manager, another TrueBlue manager, Human Resources, Legal, or contact:

Ethics at TrueBlue

Chief Ethics and Compliance Officer, and Deputy General Counsel
Legal Department, 1015 A Street, Tacoma, WA 98402
Email: ethics@trueblue.com
Phone: 1-800-610-8920

Legal

LegalDepartment@trueblue.com

Internal Audit

InternalAudit@trueblue.com



Each of Us Has a Duty to Report

Have you seen questionable behavior, but are unsure whether or not to report it? To decide whether you have a duty to report, ask yourself the following questions:

1. Does the behavior appear dishonest, unethical, or unlawful?
2. Is the behavior inconsistent with our Code or policies?
3. Does the behavior hurt our Company's reputation or its shareholders?

If you answer yes to any of these questions, you have a duty to report. You must report immediately. If you do not honor your duty to report, it may become a violation of our Code.

Q Does TrueBlue really want me to report?

A Yes, we do. In fact, you must report violations of the law, our Code, or our Company policies. Your report can minimize potential negative impacts on our Company and our people.

TrueBlue will not retaliate against any individual for reporting a good faith concern or complaint using any of the reporting methods described above, or for participating in the investigation of a concern or complaint.

Respond to Investigations

We take all reports of suspected violations and unethical behavior seriously and take appropriate steps to correct the situation. We need and expect you to be available and be honest for investigations. Cooperate fully and provide truthful, candid information. Failure to cooperate or attempts to obstruct investigations may result in disciplinary action up to and including termination.

Investigations are treated confidentially to the extent practical.

Q Why is honesty so important to an investigation?

A The Company cannot do the right thing or resolve an issue if it does not have all the facts or know exactly what happened. Your honesty – even if it means holding someone else accountable – is critical to maintaining an ethical workplace. Failure to cooperate and dishonesty during an investigation may result in discipline, up to and including termination.



< Back to contents

Do Not Retaliate

We recognize it may not be easy to speak up when something is not right and understand that speaking up may cause discomfort or anxiety. If you feel someone retaliated against you or suspect retaliation against someone else for speaking up, you must report it.

Q What is retaliation?

A Retaliation is detrimental action against anyone who engages in protected activity, such as raising a concern in good faith. Retaliation includes any adverse employment action, such as termination, suspension, demotion, or denial of a promotion; reduction to or alteration of work schedule; pay decrease; or other discipline. It may also include intimidation, bullying, or threats of physical violence.



Pause | Consider | Act

What Should You Do?

Situation

You report your manager, Stephen, for inappropriate behavior. After the report, your job load increases substantially, deadlines are shortened, and you believe you are being singled out for criticism in group meetings and being held to higher standards than your work colleagues. Are any of these actions retaliation?

Pause | Consider | Act

Possibly. These actions may point to possible retaliation by Stephen if he is taking these actions because you reported his behavior. If you are unsure about whether an action could be retaliation, reach out to Human Resources or ethics@trueblue.com. You may also report the conduct via ComplianceALERT, or through one of the other available reporting options.

Retaliation in any form is serious and we strictly prohibit it. Anyone who retaliates against an employee for making a good-faith report of unethical conduct may be subject to disciplinary action, up to and including termination.

TrueBlue strictly prohibits any retaliation against employees who:

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

ComplianceALERT Reporting Information

ComplianceALERT Reporting

< Back to contents

Manage with Integrity

As a manager you must create a workplace based on trust and integrity and promote a culture of ethics and compliance. You should reinforce an open reporting environment to promote early disclosure of potential issues. Lead by example. Live our values every day, abide by our Code and follow the law.

Each day, your words and actions influence others. When you promote a culture of ethics and compliance, your team knows that our workplace is based on trust and integrity. When you welcome reporting and prevent retaliation, you reinforce an open reporting environment that leads to early disclosure.

If a manager does not report violations – including suspected violations – it may result in disciplinary action up to and including termination.

As a manager you should always:

- **Communicate** the importance of our values and our Code.
- **Demonstrate** how our Code helps with difficult decisions.
- **Show** your team and others what leading ethically means.
- **Encourage** employees to raise concerns. Listen with empathy. Do not take sides or make judgements based solely on a report or limited information. Show that when questions are raised or suspicions are reported, action is taken. Express gratitude to those who raise concerns.
- **Protect** reporters from retaliation. Safeguard confidentiality to the greatest extent reasonably possible.
- **Know** what behavior may point to retaliation and stop it immediately. Never take an action that is retaliatory.



Q What are the two most important steps a manager can take to lead ethically?

A First, managers should regularly communicate the importance of following the law and acting ethically. Second, managers should set an example by always following our Code.

Ethics & Compliance Resources for Managers

Commit to Each Other



Commit To Each Other

We live our Code by creating an organization built on respect, kindness, and integrity. That means we strive to create an inclusive workplace where everyone can advance and thrive.

Foster Diversity and Inclusion

TrueBlue's Diversity, Equity, and Inclusion (DEI) mission is to foster a diverse and inclusive culture where every employee has an opportunity to contribute and grow in their careers. Our aim is to provide equality and fairness to all employees and associates. We treat everyone fairly without regard to age, disability, gender, sex, pregnancy, race, color, national origin, religion, or sexual orientation, or any other class or category protected by law.



To be consistent with our commitment to putting people to work and helping change lives, each of us must fight racism, bias, and various forms of bigotry. You should ensure that all employees have the resources and representation needed to create an inclusive workplace that is free of discrimination and harassment, and where integrity, fairness, and equality are paramount. When you invest in our Company's equity, you help ensure systems are in place for our diverse populations to succeed.

Create and promote a working climate where people with differing cultural backgrounds, identities, abilities, and life experiences are supported and valued. Being diverse in the ways you think, in your business practices, and in your hiring practices will create diverse teams with Diversity, Equity and Inclusion instilled at all levels.

Equal Employment Opportunity Policy

Inclusive Hiring Policy

< Back to contents

Prevent Discrimination and Harassment



Our employees are our most important asset. We have a responsibility to ensure and maintain a workplace free of harassment and discrimination. All employees are expected to promote a respectful and productive workplace. We must treat each other with respect – harassment, discrimination, and retaliation are not tolerated.

Acts of harassment, discrimination, or retaliation are not only illegal, but contribute to poor morale and negatively affect our business. You must strive to maintain a work environment without discrimination, bullying, harassment and intimidation because of age, physical and mental disability, gender, gender identity, gender expression, gender reassignment, marriage and civil partnership, pregnancy, breastfeeding or related medical condition, and maternity, race, ethnic origin, color, nationality, national origin, religion or belief, sex and sexual orientation, or any other class or category protected by law.

You have a duty to prevent harassment and discrimination and to report it if it occurs.

You must promptly report harassment, discrimination, or retaliation whether you experience it, witness it, are told about it, or suspect that it is happening.

< Back to contents

Sexual Harassment

Conduct, whether verbal, visual, or physical, that is sexual in nature and creates a harassing, hostile, and/or offensive work environment is strictly prohibited. There are two types of sexual harassment: hostile working environment and quid pro quo.

Sexual harassment may consist of unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.

- A hostile working environment focuses on sexuality or gender, is unwelcome or unwanted and affects an employee's working environment.
- Employment decisions or expectations based on an employee's willingness to grant or deny sexual favors is "quid pro quo" sexual harassment.

These acts are strictly prohibited and are not tolerated by the Company.

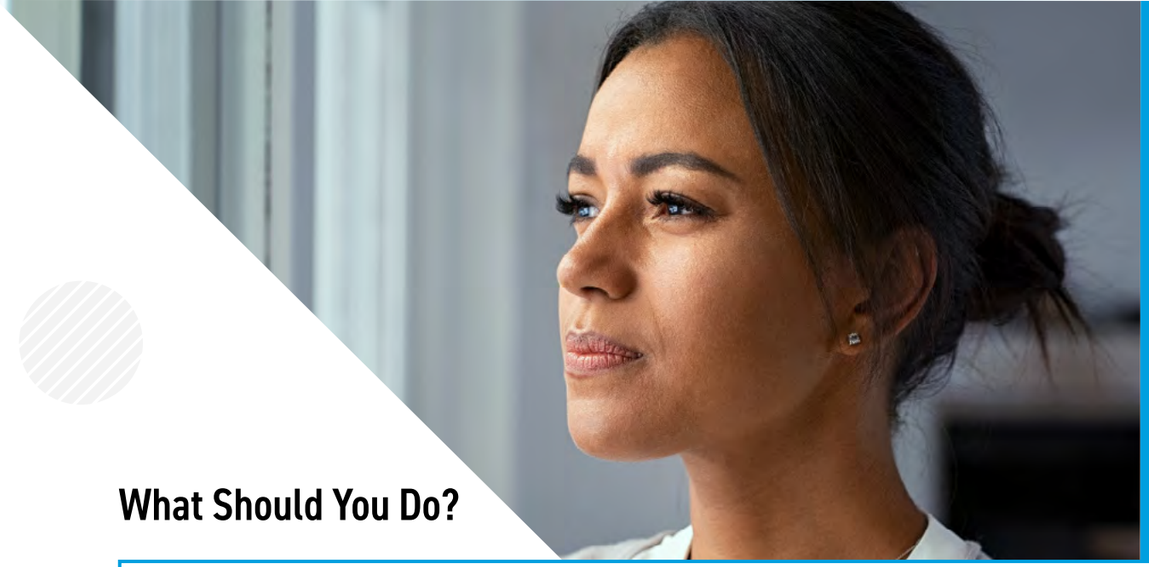
Prevention of Harassment, Discrimination and Retaliation Policy

Managers must:

- create an environment of respect where no form of harassment, discrimination, or retaliation is tolerated.
- take complaints of harassment and discrimination seriously.
- report conduct that may violate anti-discrimination and harassment policies promptly.

Manager's Guide to Receiving and Documenting a Complaint

ComplianceALERT Report Form (for Managers)



What Should You Do?

Situation

Shift Managers Janet and Bob meet for drinks. Janet complains to Bob that their Operations Director, Rick, is harassing her by making unwanted romantic advances. She asks Bob what he thinks she should do. Bob, who is uncomfortable discussing their manager, changes the subject. He does not help Janet, and he does not report what she told him. Janet does not report Rick's behavior either because she is afraid she will upset him and that he will retaliate. Because neither Bob nor Janet act, Rick keeps acting the same way. What should Janet and Bob do?

Pause | Consider | Act

Janet and Bob should both report Rick's behavior. They each have a duty to report both as employees and managers. Even if they were not managers, as employees, they still have a duty to report if they experience, learn about, or witness possible harassment. Retaliation against any individual who reports misconduct in good-faith is strictly prohibited.

Disability Discrimination

TrueBlue commits to complying fully with the Americans with Disabilities Act (ADA) and all applicable state and local fair employment practice laws. We provide equal opportunity in employment for qualified disabilities and reasonable accommodations to qualified applicants and employees. Employees who believe they need an accommodation because of a disability may submit an accommodation request to Employee Relations at HR-Advice@TrueBlue.com. Managers – be aware of the legal requirements to accommodate disabilities and your duties and obligations as a manager in the accommodation process.

Disability Accommodations Policy

ComplianceALERT Report Form (for Managers)

Guard Against Workplace Violence

TrueBlue recognized the funadamental need to ensure a safe and healthy work environment that enhances employee work satisfaction and productivity. TrueBlue strictly prohibits threats, threatening conduct, or any other acts of aggression or violence in the workplace. Any employee or associate who commits such an act may face disciplinary action, up to and including termination.

Even if you are not directly involved, you have an obligation to report any incidents that pose a risk of harm to employees or others associated with our Company or which threatens our safety, security, or financial interests.



What Should You Do?

Situation

You notice your coworker Tina is suddenly behaving oddly. She used to be positive, upbeat, and friendly. Now she is negative, withdrawn, and even aggressive. She also mentioned that she bought a gun and commented that "she's not afraid to use it." Later that week, you see Tina arguing loudly with her supervisor. When she walks past you, she mutters, "He will be sorry tomorrow. This whole place will be sorry!" What should you do?

Pause | Consider | Act

You should report Tina's comments immediately. Even if the comments were not directed toward you, you must report anything that may pose a risk of harm to employees or others associated with our Company – or which may threaten our safety, security, or financial interests.

Employee possession of firearms is prohibited on Company premises or while conducting Company business. If you become aware of or suspect incidents and threats of workplace violence, report your concerns immediately. TrueBlue has a zero tolerance for behavior that poses a direct threat to the health and safety of others.

Workplace Violence Policy

Prohibit Substance Abuse

TrueBlue commits to providing a safe and healthy work environment for all employees, associates, and clients. To ensure the safety of others, do not perform your work, either on Company premises or at a client or Third Party's premises, while taking any substance that may result in an impairment. You must not be impaired in the workplace by alcohol, drugs of any kind (regardless of whether prescribed or legal to use under local law), or any other product that causes you not to be able to work safely. You are also prohibited from possessing, using, selling, offering, or distributing illegal drugs (including marijuana and psychedelics even if legal under local law) on Company property or client and third party locations.

Anti-Substance Abuse Policy

Promote Employee Health and Safety

TrueBlue's safety programs and policies help ensure a safe and healthy workplace. No job is so important and no service so urgent that you cannot take the time to ensure work is performed safely. If accidents do occur, our Company commits to helping injured employees return to productive work.

If you see safety concerns, report them. It is a violation of our Code and policies to discourage others from reporting an injury. Retaliation against any individual who reports a job-related injury is strictly prohibited.

Workplace Safety, Injury Prevention and Accident Response and Reporting Policy



Avoid Conflicts of Interest

Our business decisions should always support TrueBlue's best interests. Each of us must avoid situations that interfere – or appear to interfere – with the ability to make the right decisions for our business.

A conflict of interest can make it difficult to not only make the right decision, but to perform work objectively and effectively. If avoiding a conflict is not possible, you must promptly disclose the conflict using the Conflicts of Interest Disclosure Form.

Common situations that may create conflicts of interest and that must be avoided or disclosed include:

- **Family or Personal Relationship.** Conflicts occur when you make employment decisions, including hiring, promotion, pay, discipline or termination, for family or people you have a personal relationship with or when those decisions benefit a family member, close friend, household member, relative, spouse, domestic partner, relative of a spouse or domestic partner, current and former romantic partner or their relative.
- **Financial Interest or Business Relationship.** Conflicts occur when you have an outside personal, financial, or business interest that may affect your ability to perform work objectively.
- **Outside Opportunities.** Conflicts occur when outside employment or other opportunities compete or interfere with your work at TrueBlue. You should not take for yourself business opportunities that arise through your work at TrueBlue. In addition, you cannot use TrueBlue property, information or business relationships for personal gain. Outside Opportunities should be disclosed through our Outside Opportunity Disclosure Form.
- **Meals, Gifts, Travel, and Entertainment.** Conflicts occur when we offer or accept meals, gifts, or entertainment that might be intended to influence business activities or decisions.

< Back to contents

Disclosure and Resolution

Remember: Having a conflict of interest is not necessarily a violation of our Code but not disclosing a conflict is. Disclosure of conflicts of interest is essential. When you disclose, you protect yourself and TrueBlue. Failure to make required disclosures or resolve conflicts of interest may result in discipline, up to and including, termination.

TrueBlue's Directors and upper management have additional responsibilities to report conflicts of interest. If a Director has a conflict of interest that would interfere with their ability to perform their duties, they must notify the Board of Directors' Audit Committee Chair (or in the case of the Audit Committee Chair, the Chief Ethics and Compliance Officer or General Counsel).

What Should You Do?

Situation

You work in a branch that services a large construction site. Your brother Ted recently lost his construction job and wants to know if you can get him work for that client. What should you do?

Pause | Consider | Act

Because of your personal relationship, you should talk to your manager. If you would have any control over Ted's hiring, pay, or work, there may be a conflict of interest. Always report any potential conflict of interest before taking any action.

Would your answer be different if you were the branch manager? No. You should still talk to your manager. The same considerations apply whether you are a manager or an employee.



What Should You Do?

Situation

You collaborate with a supplier to provide services to TrueBlue. Two years into the partnership, the supplier starts dating your sister. Does this create a conflict of interest? What should you do?

Pause | Consider | Act

Possibly. Depending on what your role is, managing the supplier or their contract may create a conflict of interest or at least the appearance of a conflict to others. You should disclose the connection between your sister and the supplier to protect yourself and the Company.

Conflicts of Interest Policy

For questions or assistance related to a Conflict of Interest, reach out to ethics@trueblue.com

Commit to Protecting Our Company



Commit to Protecting Our Company

We live our Code by being honest, trustworthy, and attentive to what is best for our company. That means we are vigilant about safeguarding information about our people, our business, our data, our assets, and our reputation.



Build Responsible Third Party Relationships

Our Company seeks to do business with those who share our commitment to ethics and compliance. You should select suppliers, vendors, consultants, agents, intermediaries, joint venture partners, and any other business partners (third parties) based on objective criteria laid out in our due diligence process. Third party business partners must follow the standards in our Supplier Code of Conduct.

Watch for Fraud, Theft, and Dishonesty

At TrueBlue, we are truthful, trustworthy, and honest. We take all reasonable and appropriate steps to prevent fraud. We have zero tolerance for acts of dishonesty, theft, embezzlement, misappropriation, falsification of records, money laundering, or similar acts. Any offender committing one of these acts may face termination and prosecution. As a TrueBlue employee, you have a duty to prevent fraud and to report suspected fraud. Failure to report may lead to disciplinary action, up to and including termination.

What Should You Do?

Situation

Each day you process payments for the associates working from your branch. One month you need an emergency car repair so you can continue to come to work. You decide to pay yourself instead of an associate so you can cover the expenses of your car repair. You promise yourself you will pay the company back. What consequences could you face for stealing this money?

Pause | Consider | Act

TrueBlue has a zero-tolerance policy for fraud. You violated not only company policy, but the law. The consequences for your actions are most likely termination, as well as criminal and civil prosecution.



Pause | Consider | Act

What Should You Do?

Situation

You have worked for TrueBlue for 20 years and dedicated your career to growing the company. You decide to leave TrueBlue and explore other opportunities. Upon your departure, you decide to keep contact lists, supplier lists, and internal company forms and information so that you can secure a job at another staffing agency if needed. What consequences could you face for taking this data?

Pause | Consider | Act

The lists and information taken are confidential and intellectual property or proprietary information belonging to the Company and may qualify as trade secrets under federal or state law. For this type of theft, you may face prosecution and possibly a civil lawsuit seeking monetary damages and a court order that you are to return the lists and information and not disclose the information to others. Additionally, if you are bound by a Non-Compete and/or Non-Solicitation Agreement, you could face additional consequences based on applicable law if your actions violate the terms of that agreement.

Fraud Prevention Policy

< Back to contents

Protect Against Bribery and Corruption

TrueBlue strictly prohibits all forms of bribery and corruption in all our worldwide business activities. We take care to know and follow the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and applicable local anti-corruption laws where we do business. When working with governments and government officials you must be particularly careful to avoid any appearance of improper influence. Never accept or provide a bribe, kickback, or corrupt payment, or allow anyone else to accept or provide a bribe, kickback, or corrupt payment on behalf of our Company.

Third parties must also comply with applicable anti-bribery and corruption laws. Never compromise third party relationships by allowing a conflict of interest or by giving or receiving inappropriate gifts, meals, entertainment, or travel.

Watch for these red flags with current or prospective third parties:

- Refusals to undergo due diligence
- Recommendations by a government official
- Requests for pricing or fees that seem unreasonable
- Requests to be paid in cash.

Our Anti-Bribery and Corruption policy provides detailed guidance. Because the laws governing bribery and corruption are complex, reach out to ethics@trueblue.com or TrueBlue's Chief Ethics and Compliance Officer for questions or concerns or if you see or suspect a violation.



What Should You Do?

Situation

You hire an outside IT firm to do work on your company computers. When you receive the invoice, there are added charges for "unspecified technical services." What should you do?

Pause | Consider | Act

You should ask the IT firm for an explanation of the "unspecified technical services." If you do not get a satisfactory answer, reach out to the Legal Compliance team for help.

Anti-Bribery and Corruption Policy

Exchange Appropriate Third-Party Gifts, Meals, Entertainment, or Travel

TrueBlue recognizes that gifts, meals, entertainment, or travel may be exchanged to foster goodwill and create lasting business relationships. When you give gifts and entertainment to stakeholders, third parties, or others, you must ensure these kinds of gifts are reasonable, approved and properly documented. Never try to influence anyone to act improperly in their official capacity by offering, promising, or giving a gift or extending a business advantage.

Gifts, meals, travel, and business entertainment must comply with applicable international and local laws, regulations, and Company policies. Refer to our Anti-Bribery and Corruption policy and the Third Party Gifts, Meals, Travel, and Entertainment policy for additional guidance.

Accepting and giving gifts must never influence, or appear to influence, decisions we make on behalf of TrueBlue. Remember, a gift is anything of value such as meals, lodging, loans, cash, favorable terms or discounts on services, transportation, vacation, stocks or other securities, home improvements, gift cards, memberships, and event tickets. The potential list is endless. Use caution and common sense any time you give and accept gifts, payments, or services from those you seek to do business with or who seek to do business with you.

Accepting Gifts

Employees must never ask for gifts from any stakeholder or third party. Do not accept any gift intended to influence your decisions or cause you to feel any obligation to the giver. Avoid even the appearance of being improperly influenced. Before accepting any offers of meals, entertainment, gifts, or travel, review the Company's Third Party Gifts, Meals, Travel, and Entertainment policy for advance approval and documentation requirements.

Giving Gifts

Employees must also not give gifts to any stakeholder or third party with the intent to influence their decision or create an obligation. You must avoid the appearance of improperly influencing anyone by giving them a gift. Employees should refer to the Company's Third Party Gifts, Meals, Travel and Entertainment policy for additional guidance on minimum and maximum allowed gifts and additional procedures and approval requirements.



What Should You Do?

Situation

As a token of appreciation for our business, a vendor offers you two tickets for a World Cup game suite. Should you accept them?

Pause | Consider | Act

No. The value of two World Cup tickets would be considered an extravagant and excessive gift and a violation of company policy. Gifts from a third party that exceed the maximum threshold stated in our Third Party Meals, Gifts, Travel, and Entertainment Policy should not be accepted without the approval of the Chief Ethics and Compliance Officer. Consult our policy for further guidance or reach out to ethics@trueblue.com for assistance.

Supplier Code of Conduct

Third Party Meals, Gifts, Travel, and Entertainment Policy and Request Forms

Be an Accounting and Recordkeeping Guardian

Our financial and other business records must be complete, accurate, and properly reflect our Company's operations and activities. TrueBlue honestly, accurately, and fully records and reports our Company's financial transactions and business information in compliance with applicable laws, regulations, and accounting standards. Many employees – not just accountants and controllers – have responsibility for our Company's recordkeeping and/or preparation of our Company's financial statements and reports. All employees must ensure that we maintain complete and accurate books and records.

You must maintain and provide all accounting and financial records according to applicable laws. These records must accurately and fairly reflect our assets, liabilities, revenues, and expenses and must also follow United States Generally Accepted Accounting Practices ("U.S. GAAP") and any applicable local standards in all jurisdictions in which we operate.

Always respond promptly, timely, fully, and accurately to inquiries from our Company's internal accountants or auditors or its independent auditor. If it appears that accounting, financial reporting, or auditing violations may have occurred, you must report and can do so through ComplianceALERT or by contacting our Company's Chief Ethics and Compliance Officer, General Counsel, Internal Audit leader, or the Board of Directors' Audit Committee Chair. Notices of suspected violations will be sent to the Audit Committee.





Shield Company Confidential and Proprietary Information

From time to time, employees may receive confidential and proprietary business information or trade secrets about TrueBlue, our clients, or our vendors. The confidentiality of this information must be maintained unless disclosure is authorized or legally required.

When you review, collect, use, share, or store Personal Information:

- Use confidential information only for legitimate business purposes related to your job.
- Disclose confidential information only to people authorized to receive it.
- Take all reasonable security precautions to protect confidential information against unauthorized use.
- Report any unauthorized disclosure or use of confidential information to TrueBlue Legal.

All confidential information we collect is for our use only. Never give confidential information to a non-TrueBlue party without a signed confidentiality agreement approved by the Legal Department.

Q What kinds of information should I keep confidential?

A Company information such as strategic plans, programs, and methods, and financial information that has not been released to the public, client information, contracts, login credentials, and passwords should be kept confidential. Personal information such as identification numbers and dates of birth of employees and associates are also examples of confidential information we should protect.

< Back to contents

Protect Personal Information, Privacy, and Security

We collect and handle Personal Information (PI) from and about our associates, candidates, employees, and clients. Personal Information includes any information that identifies an individual. It may include contact information, financial information, employment history, government identifiers, or health information.

When collecting, using, sharing, or storing PI, always:

- Collect PI according to TrueBlue's Privacy Notice.
- Ensure individuals consent to our collection, use, and storage of their PI.
- Only use PI for a defined and legitimate business purpose. Never use it for a non-business purpose.
- Only collect the minimum amount of PI necessary to accomplish a legitimate business purpose.
- Immediately report any suspected unapproved leak of PI to the Legal Department.

Personal Information Privacy Policy



Q How does the Company protect employee PI?

A The Company implements a variety of security controls to protect employee information. Always collect, access, transfer, and release PI as outlined in our data protection, privacy, and information security policies as well as applicable data protection laws.

Q What should you do if a data breach occurs?

A If a data breach happens or may have happened, immediately contact the Legal Department.

< Back to contents

Safeguard Assets

You are responsible for protecting our Company's assets, data, property, and facilities used by, or issued to, you. Assets should be used and maintained responsibly, efficiently, and appropriately – and for conducting legitimate business. Using a Company asset to perform harmful, unlawful, or unethical conduct is strictly prohibited and a violation of our Code.

Our records and data are also considered important assets. Also refer to our Records Management policy and Retention Schedule for the proper retention, preservation, and destruction of records necessary for our business.

Q Are employee emails and voicemails private?

A Work email, voicemail, and internet access are for work purposes. TrueBlue may monitor them at any time.



Commit to Respecting the Law



< Back to contents

Commit to Respecting the Law

We live our Code by acting responsibly and following all laws that relate to our business. That means we follow both the letter and intent of the law in all things we do and under all circumstances.

Respect Laws Around the World

It is essential to our business and to upholding our values that we commit to respecting the law wherever we do business.

Following the law protects us, builds trust with governments, strengthens the communities where we live and work, and contributes to a fair society.

For questions or concerns about the law in any country where we operate or that govern our business contact the Legal Department.



What Should You Do?

Situation

You are offered a project in a country where we do not currently do business. Since the project is small and will only last a few months, do you need to consider the laws for doing business there?

Pause | Consider | Act

Maybe. Always contact Legal before you begin work in a new country. Employment, licensing, and financial regulations are all examples of business requirements that may significantly differ from one country to another.

Avoid Trading on Inside Information

Insider trading occurs when employees or their family members trade (buy or sell) securities, while having knowledge of material, non-public information. “Material” means a reasonable investor would likely consider the information important when deciding whether to buy or sell stock. “Non-public” means the general public is not aware of the information. Chances are information will be considered material if its discovery leads to a decision to buy or sell stock. Insider trading is always illegal.

Examples of material information that can be used for insider trading include:

- annual or quarterly financial results
- a change in earnings projections
- unexpected or unusual gains or losses
- significant changes in prices, clients, or suppliers
- major developments in litigation or regulatory matters
- significant management changes
- a cybersecurity incident

Prohibited activities that may be perceived as insider trading include:

- Providing material, non-public information to family members, friends, former co-workers, or other acquaintances (“tipping”)
- Trading Company stock in violation of blackout period restrictions
- Assisting someone in prohibited trading activity

Insider Trading Policy



Compete Fairly

TrueBlue competes fairly. We maintain and grow our business through superior services, not through improper or unethical business practices. You should treat partners, employees, and competitors with the respect you would want to receive in return. Working honestly, without improper business advantages reinforces our commitment to our values as well as antitrust laws, also known as competition or monopoly laws.

When dealing with competitors, never take action that violates applicable antitrust or competition laws. Agreements – whether formal or informal, written or verbal – that attempt to set profits or margins, coordinate recruitment strategies or employee salaries, or allocate clients or sales territories may be unethical and/or illegal. Do not discuss these kinds of topics with a competitor, even in an informal setting such as a trade show or customer event. Consult ethics@trueblue.com whenever you have a question about antitrust or competitive practices.

< Back to contents

Uphold Labor and Employment Laws

Our Company is in the business of employing people. We follow all labor and employment laws and are committed to:

- providing equal employment opportunities.
- hiring people with disabilities and providing reasonable accommodations.
- complying with all leave and time off laws and Company policy.
- maintaining a workplace free from harassment, discrimination, and retaliation.
- paying our employees accurately for all time worked.

Managers are responsible for knowing and following labor and employment laws affecting our employees. Managers must ensure employees comply with our Company's wage and hour and timekeeping policies.



What Should You Do?

Situation

You are paid to work 8 hours each day. During a big project, your manager asks you to work in the evenings to get the job done, but not report those hours. He promises you an extra vacation day for those hours worked. Is that okay?

Pause | Consider | Act

No. If you work those evening hours and do not report them, you submit false time records which is a violation of Company policy and possibly the law. In addition, a manager should never request an employee to inaccurately record their time. When in doubt, reach out to HR or ethics@trueblue.com, and report any misconduct to ComplianceALERT or through one of our available reporting options.

< Back to contents

Involvement in Political Activities and Charitable Contributions

It is a violation of our Code to exert, or attempt to exert, improper influence on the government of any country in order to produce an outcome favorable to the Company.

Lobbying on behalf of TrueBlue is only done by TrueBlue's Government Affairs team. When you participate in civic and political activities, you must do so only on your personal time and never as a representative of our Company.

Because political and charitable contributions are highly regulated, you should not give any direct or indirect contributions, services, or other property on behalf of TrueBlue. These restrictions apply to any candidate for public office, any political party, or any political organization unless the Chief Ethics and Compliance Officer or General Counsel gives authorization. It is a violation of the Code to exert, or attempt to exert, improper influence on the government of any country in order to produce an outcome favorable to our Company.

Q You are very excited when your neighbor and best friend is elected mayor. One year later, the city is considering passing a law that would restrict staffing agency business. What should you do? Should you talk to your friend and see if he can stop the law?

A No. First, you should contact TrueBlue's Government Affairs team to tell them about the possible new law. Since you cannot lobby on TrueBlue's behalf, rely on the Government Affairs team for guidance.



Commit to Being a Force for Good in Our Communities



Commit to Being a Force for Good in Our Communities

We live our Code by recognizing that as individuals and as a company we can positively impact the world around us. That means we work to be good corporate citizens who contribute to and support our employees, associates, clients, and the communities in which we operate.

Strive for Social and Environmental Responsibility

TrueBlue and its employees affect the lives of hundreds of thousands of people each year. The Company understands the impact we have on our workforce and the communities where we operate. We encourage our employees to support the particular needs of our neighbors through appropriate community involvement. Additionally, we commit to being good environmental stewards and make efforts to establish sustainable practices that reduce our Company's environmental impact.

TrueBlue's Corporate Citizenship Report



Respect Human Rights

TrueBlue commits to fostering a work environment that is free from human trafficking, forced or compulsory labor, unlawful child labor, or slavery – also known as modern slavery and human trafficking.

- We follow, and expect all clients, stakeholders, and third parties to abide by all international labor and immigration laws.
- We have zero tolerance for, and maintain systems and controls to prevent, any acts of modern slavery and human trafficking in our business or supply chains.

If you become aware of any actual or suspected acts of modern slavery and human trafficking by any employee, client, stakeholder or third party, you must report it as soon as possible.

Q You believe that a third party selected for a project was in the news last year for using child labor in another country. What should you do?

A You should immediately report any suspected unlawful child labor by a third party even if it occurred in the past or in another country. By selecting a third party with potential history in human rights abuses, our Company's reputation and commitment to human rights is at risk.

Anti-Human Trafficking, Child Labor and Modern Slavery Policy
Statement on Human Rights
UK Modern Slavery Statement

Use Good Judgement with Communications

Media Relations

Corporate Communications has the primary responsibility to speak on behalf of TrueBlue and manage the Company's public reputation. It is the responsibility of Corporate Communications to provide information to, and interact with, the media about Company business. Only a Company designated spokesperson may speak on behalf of the Company to the media, national broadcasters, local television and radio stations, newspapers, and digital media such as websites and blogs. You should always immediately forward media inquiries for responses on behalf of the Company to Corporate Communications which will determine and provide the appropriate response, if any. Corporate Communications may be reached by email at pr@trueblue.com or phone at +1-253-680-8291.

Media Relations Policy

Social Media

Social media can be a fun and rewarding way to share life and opinions with family, friends, and co-workers around the world. However, you are solely responsible for what you post online during your free time. TrueBlue encourages postings that reflect our values. You may not disclose any confidential Company information. Content that defames you, your colleagues, or the Company may result in disciplinary action, up to and including, termination. If you have any questions about using social media, reach out to Corporate Communications by email at pr@trueblue.com or phone at +1-253-680-8291.

Social Media Policy



< Back to contents

Resources

TrueBlue, Inc.
1015 A Street
Tacoma, WA, 98402

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Translations: In addition to English, The Code is published in the following languages: English, French Canadian, Polish, and Spanish.

Applicable Audience: our Code applies to the TrueBlue Board of Directors, officers, employees, and associates. We expect our agents, consultants, contractors, suppliers, vendors, joint venture partners and intermediaries (collectively "Third Parties") to share in the principles outlined in our Code of Conduct, and abide by our Suppler Code of Conduct.

Conflict with Law: Should our Code conflict with any relevant code, law or regulation, the provision of that code, law, or regulation shall govern.

Accessing our Code: Our Company encourages employees to access the internal TrueBlue Ethics site for a current version of The Code. Our Company also maintains The Code on our TrueBlue website.

Accessing Company Policies: For the most current versions of Company Policies, employees should visit My Company Policies. Policies are subject to change without prior notice.

Review Process: We periodically review our Code to determine whether revisions may be required due to changes in the law or regulations, our business, or the business environment. The Chief Ethics and Compliance Officer, and depending on the change, General Counsel, and the Board of Directors, must approve changes to our Code.

Disclaimer: The information presented in our Code is not a contract or an offer of a contract. The terms of our employment relationships are implemented at the sole discretion of TrueBlue and may be withdrawn or changed at any time, with or without notice.

Waivers: Any waiver of our Code for executive officers or directors of TrueBlue, may only be given by the Board of Directors (or a Board committee) and may be publicly disclosed if required by applicable laws, rules, or regulations. Generally, TrueBlue does not give waivers to our Code.

ComplianceALERT Exceptions:
In the U.K. and European Union, we strongly encourage you to identify yourself when reporting a concern through ComplianceALERT. Where permitted by the law of your country, your reports may be made anonymously or directly to your local management. Your privacy will be maintained in accordance with the law of your country and applicable European Union data protection laws. Whenever reporting a concern, we encourage you to present all details relating to your concern. The ComplianceALERT hotline is not intended to be a general complaint line or a place for reporting operational issues. In the UK, ComplianceALERT supplements the normal grievance procedure and is another option for employees wishing to report violations of our Code or other concerns.



