Anti-Discrimination Policy
Exactpi Recruitment | Exact Staffing Agency | Exact Staffing Services

1. Purpose and Guiding Principle

Exactpi is committed to a labor market in which everyone has a fair chance at employment. We reject all forms of discrimination.

In our recruitment, selection, placement, staffing, and secondment processes, we evaluate candidates solely based on objective criteria relevant to the position and its performance.
Personal characteristics that are not necessarily related to the position play no role in our assessment or selection.

This guiding principle applies to all divisions of Exactpi and to all employees involved in interactions with candidates, employees, and clients.

2. What do we mean by discrimination?

We define discrimination as making direct or indirect, impermissible distinctions between individuals based on personal characteristics that are not relevant to the performance of the job.

This also includes complying with requests from clients to select or exclude candidates based on characteristics that are not necessary or relevant to the effective performance of the job.

A selection criterion that appears neutral may, in practice, still disadvantage certain groups. In such cases as well, we assess whether the criterion is truly necessary and objectively justifiable.

Grounds for Discrimination

In recruitment, selection, and employment, no unlawful distinction may be made on the basis of:

- religion;
- philosophy of life;
- political affiliation;
- race, including skin color and ethnic origin;
- sex, including pregnancy, childbirth, motherhood, sexual characteristics, gender identity, and gender expression;
- nationality;
- sexual orientation;
- marital status;
- disability or chronic illness;
- age.

In addition, employment conditions include rules regarding equal treatment of people who work full-time or part-time and those with permanent or temporary contracts.

Discrimination can occur in two ways: direct or indirect.

Direct discrimination

Direct discrimination means that someone is treated differently from another person in a comparable situation because of a protected personal characteristic, without there being a legally permitted exception for doing so. It is usually easy to recognize.

Example: *A client says, "For this position, we only want a man." A qualified candidate is thus excluded because of her gender. Exactpi does not comply with this request and asks which knowledge, skills, or tasks are actually important for the position.*

Indirect Discrimination

Indirect discrimination occurs when an apparently neutral requirement, rule, or practice disproportionately disadvantages people with a particular protected characteristic, without any objective justification. This form is more difficult to recognize.

Example: *An employer requires flawless Dutch proficiency for a position in which employees handle only English-language customer inquiries and Dutch is otherwise unnecessary. This language requirement can disproportionately disadvantage people from different backgrounds. Because the requirement is not necessary for the job, Exactpi does not enforce it.*

Indirect discrimination is permitted only if there is a valid reason (objective justification) for it. For example, for the position of call center agent, you may require that a candidate be proficient in Dutch. Without this skill, the position cannot be performed.

3. Exactpi's Principles

Exactpi adheres to the following principles:

1. We reject any form of discrimination in recruitment, selection, placement, temporary staffing, and secondment.
2. Candidates are assessed based on objective and job-related criteria, such as relevant knowledge, competencies, experience, education, and demonstrable job requirements.
3. We do not comply with discriminatory requests from clients.
4. If a client specifies a selection criterion that may be discriminatory, we first investigate the underlying functional need.
5. A discriminatory criterion may only be applied if there is a legally permissible and objective justification for it.
6. Candidates and employees working through Exactpi must also be free from discriminatory or otherwise undesirable treatment while performing their duties for a client.
7. Exactpi employees are supported when they reject a discriminatory request from a client. The commercial interest of an assignment is never a reason to participate in discrimination.

4. Objective Justification

When a client requests that a specific criterion be taken into account during the selection process, we assess whether this criterion is actually necessary for the position.

If there is a possibility of indirect discrimination, we assess whether there is an objective justification. In doing so, all of the following conditions must be met:

- ✓ there is a legitimate and job-related purpose;
- ✓ the means used is suitable for achieving that purpose;
- ✓ the means is reasonably proportionate to the objective;
- ✓ there is no other, less discriminatory way to achieve the same objective.

In case of doubt, an employee should not decide independently that a criterion is permissible. The employee should discuss the situation with management.

Example: *a language requirement necessary for the position*
A client is looking for an employee who handles complex Dutch-language complaints on a daily basis and independently drafts written responses. A high level of oral and written proficiency in Dutch may be necessary for this position. Such a language requirement can particularly disadvantage people from different cultural backgrounds. However, the requirement can be objectively justified if the employer can substantiate what level of language proficiency is necessary for the job and why a lower level is insufficient.

Exactpi then selects candidates based on their ***demonstrable language proficiency****. A candidate does not need to have Dutch nationality for this, nor does Dutch need to be their native language. Furthermore, no higher language proficiency level is required than what the job demands.*

5. Step-by-Step Plan for Handling a Potentially Discriminatory Request

Every Exactpi employee has a personal responsibility to recognize discriminatory requests and to refuse to comply with them.

In the event of a potentially discriminatory request, the following steps are taken.

Step 1. Recognition
The employee assesses whether the requested criterion is directly and demonstrably related to the ability to perform the job effectively.

Step 2. Ask Follow-Up Questions
If the reason for the criterion is unclear, the employee asks about the need behind the request.
For example:
- ✓ Why is this criterion important for the job?
- ✓ What tasks make this necessary?
- ✓ What result do you hope to achieve with this?

The goal here is to translate the underlying need into an objective, job-related criterion.

Step 3. Evaluation
The employee assesses whether the criterion is necessary, appropriate, and proportionate.
In case of doubt, the matter is discussed with the operational management.

Step 4. Setting Limits
If the request is discriminatory, the employee clearly states that Exactpi will not comply with it. The employee explains that Exactpi selects candidates exclusively based on objective and job-related criteria.

Step 5. Offer an Alternative
Where possible, the employee helps the client rephrase the underlying need. For example, a request to find a candidate from a specific age group can potentially be rephrased to specify the actual desired experience, competencies, availability, or knowledge.

Step 6. Escalate
If a client continues to insist on a potentially discriminatory criterion, the employee discusses this with management.

Step 7. Recording
Clearly discriminatory requests, recurring borderline cases, and relevant incidents are recorded internally.

At a minimum, the following information is recorded:
- ✓ date;
- ✓ nature of the request or incident;
- ✓ action taken;
- ✓ any escalation;
- ✓ outcome.

Personal data is recorded only when necessary for handling the incident.

Step 8. Determine Consequences
If a client continues to insist on discriminatory selection criteria despite an explanation, Exactpi will not comply with that request.

In the event of serious or repeated violations, management will assess whether continuing the collaboration with the client is desirable and responsible.

6. Real-world examples

For example, employees may be confronted with requests such as:
- ✓ "We're looking for someone under 35."
- ✓ "We'd prefer a man for this position."
- ✓ "The team already has a lot of women."
- ✓ "No candidates with a foreign accent."
- ✓ "Someone with a Dutch background."
- ✓ "We're looking for someone who is young and energetic."
- ✓ "That candidate doesn't fit in here culturally."
- ✓ "For this position, we only want a native speaker."

Statements like these warrant further critical inquiry. Sometimes, a request is based on a legitimate job requirement. For example, a client may require a specific language proficiency level due to complex client communications. In that case, Exactpi selects candidates based on the required language proficiency level, not on nationality or background.

Our staff therefore always assess the actual job requirement and not the client's personal preference.

7. Employee Responsibility

Every Exactpi employee:
- ✓ is familiar with and endorses this policy;
- ✓ is alert to direct and indirect discrimination;
- ✓ evaluates candidates solely based on relevant job criteria;
- ✓ does not cooperate with discriminatory requests;
- ✓ asks for clarification when a selection criterion is unclear or potentially discriminatory;
- ✓ seeks internal advice when in doubt;
- ✓ reports relevant incidents or signs;
- ✓ treats candidates, colleagues, and clients with respect.

If employees have doubts about a client's request, they can contact management.

8. Exactpi's Responsibility as an Employer

Exactpi is responsible for providing a work environment in which employees can effectively implement the policy.

By this we mean:
- ✓ creating a safe work environment;
- ✓ clear leadership from executive and middle management;
- ✓ supporting employees when they reject a discriminatory customer request;
- ✓ ensuring that the policy is accessible and well-known;
- ✓ training employees to recognize discrimination and address it openly;
- ✓ taking incidents and complaints seriously;
- ✓ periodically reviewing and improving the policy;
- ✓ actively communicate the policy to clients.

9. Communication to Employees

This policy applies to all permanent employees of Exactpi.

New employees receive the policy during their onboarding. The policy is discussed during the orientation, with specific attention given to how employees should respond to discriminatory requests.

The current policy is also available to all employees via Teams.

Existing employees are informed whenever the content of the policy is changed.
Exactpi maintains appropriate records to confirm that employees have reviewed the policy and the accompanying instructions. In addition, there is at least one specific awareness-raising session each year.

10. Training and Awareness

Preventing discrimination is a structural component of the training and development of Exactpi employees.

Upon Hiring

Every new employee who performs work related to candidates, employees, or clients receives instruction on:

- ✓ the anti-discrimination policy;
- ✓ relevant legal principles;
- ✓ direct and indirect discrimination;
- ✓ objective job criteria;
- ✓ how to recognize discriminatory requests;
- ✓ Exactpi's step-by-step plan;
- ✓ the internal escalation and complaint procedure.

We use the ABU webinar on this topic for this purpose. In addition, every new employee completes the *ABU "Diversity Pays Off" Challenge* during onboarding. This challenge raises employees' awareness of discrimination, diversity, inclusion, and recognizing unlawful discrimination in job placement in an interactive way. Completing the policy review and the "Diversity Pays Off" Challenge is included in the onboarding checklist.

Annual Event—Diversity Day

Every year around Diversity Day in October, Exactpi devotes organization-wide attention to the anti-discrimination policy, diversity, inclusion, and equal opportunities in the labor market.

During this annual event, at a minimum:

- the anti-discrimination policy is highlighted once again;
- attention is given to current real-world examples;
- knowledge about direct and indirect discrimination is refreshed;
- discuss how employees should handle discriminatory or questionable customer requests;
- where relevant, information is shared about developments in legislation, regulations, or ABU guidelines.

The session may consist of a knowledge session, real-world case studies, a team discussion, or a combination of these.

Participation and the content of this activity are recorded. Even outside of Diversity Day, current cases or developments may provide an opportunity to discuss the topic within teams on an ad hoc basis.

11. Complaints and Reporting Procedure

Exactpi wants employees, candidates, temporary workers, and seconded employees to feel safe reporting discrimination. A report may concern behavior within Exactpi, during the selection process, or while working at a client site.

Where can a report be filed?

A candidate, temporary worker, seconded employee, or permanent employee can file a report with:
Jeanniczé Coco
coco@exactpi.nl

If the person filing the report does not feel comfortable reporting the incident to this individual, or if the report concerns this individual, the report can be filed with HR Advisor Ana Bilogrevic or a member of the executive board.

Handling the Report

Upon receipt of a report:

1. the report will be acknowledged as soon as possible;
2. an assessment is made of what follow-up steps are necessary;
3. the relevant facts are investigated;
4. where necessary, both sides are given an opportunity to be heard;
5. appropriate measures are taken if the report warrants it;
6. the reporter will, to the extent possible, receive feedback on the handling and outcome of the report.

Confidentiality

Reports are treated confidentially. Information regarding the report is shared only with those who need it to handle the report properly.

No Retaliation

No one may be disadvantaged because they reported discrimination in good faith, filed a complaint, or cooperated in an investigation into a complaint.

Recording

Reports and complaints are recorded, anonymized where possible.
This record is used to identify patterns and improve Exactpi's policies and procedures.

12. Discrimination While Working for a Client

Exactpi does not tolerate temporary workers or seconded employees being treated in a discriminatory manner by a client, colleagues, customers, or other parties involved while performing their work.

If an employee experiences or observes discrimination:

- ✓ this can be reported to Exactpi;
- ✓ Exactpi will discuss with the employee what action is appropriate;
- ✓ Exactpi will contact the client if necessary;
- ✓ Exactpi will assess what measures are necessary to ensure a safe work environment.

In serious situations, Exactpi may decide to reconsider further collaboration with the client in question.

13. Communicating the Policy to Clients

Exactpi also makes it clear to clients that we do not tolerate discrimination. We communicate that candidates are assessed solely on the basis of objective and job-related criteria.

- ✓ This principle is incorporated into commercial processes and communications as appropriate, for example:
- ✓ during the job posting or assignment intake;
- ✓ in quotes and assignment confirmations;
- ✓ in collaboration agreements or terms and conditions;
- ✓ in information on the website;
- ✓ when a client mentions a potentially discriminatory selection criterion.

Employees are supported in professionally addressing and, where necessary, rejecting discriminatory requests.

14. Action Plan 2026

Action	Frequency	Responsible	Ensuring
Discuss the policy during onboarding, including the ABU webinar	Every new employee	HR/Manager	Onboarding Checklist
Complete the ABU "Diversity Pays Off" Challenge	Every new employee	HR/Manager	Onboarding Checklist
Organization-wide focus on anti-discrimination policy during Diversity Day	Annually in October	HR Advisor	Program/Participation
Discuss real-life cases of discrimination	At least once a year and as needed in between	HR/Management	Agenda or report
Ensuring adherence to objective criteria during job applicant interviews	Ongoing	Consultants	Regular work process
Recording discriminatory requests and relevant incidents	Ongoing	Employees/HR	Internal recording
Evaluating complaints and incidents	At least annually	HR Advisor/Management	Annual evaluation
Communicating the anti-discrimination policy to clients	Ongoing	Consultants/Sales	Intake and client communication
Reviewing the policy to ensure it remains up-to-date	At least annually	HR Advisor	Version control/evaluation
Follow up on actions from the annual evaluation	Annually and as needed in between	HR Advisor/Management	Action List

15. Annual Review and Maintenance

At least once a year, the HR advisor, together with the relevant stakeholders, assesses whether this policy remains current and effective.

The annual Diversity Day event also provides a natural opportunity to assess the policy's effectiveness and awareness.

At a minimum, the following will be reviewed:
- ✓ changes in relevant laws and regulations;
- ✓ changes in requirements set by industry organizations, including the ABU;
- ✓ recorded incidents and discriminatory requests;
- ✓ complaints and reports received;
- ✓ employee experiences;
- ✓ onboarding and training activities carried out;
- ✓ participation in the Diversity Pays Off Challenge;
- ✓ the annual Diversity Day event;
- ✓ communication with clients;
- ✓ any areas for improvement identified in internal or external audits.

A brief written summary of the evaluation will be prepared, if relevant. If warranted, the policy will be amended during the year.

16. Assurance and Documentation

Exactpi retains, to the extent relevant, documentation that demonstrates the implementation of this policy.

This may include:
- ✓ the version of this policy adopted by management;
- ✓ version history;
- ✓ onboarding records;
- ✓ records of participation in the ABU Diversity Pays Off Challenge;
- ✓ records of the annual Diversity Day activities;
- ✓ training and presentation records;
- ✓ annual evaluations;
- ✓ anonymized incident reports;
- ✓ improvement actions;
- ✓ examples of communications with clients.

The purpose of this is not only to provide evidence during an audit, but above all to systematically apply and improve the policy in daily practice.

17. Adoption

This policy has been adopted by the management of Exactpi and applies to all Exactpi brands, Exact Personeelsintermediair, and Exact Detachering.

Version:	2026.1
Adopted on:	October 27, 2026
Approved by:	Exactpi Management
Policy Officer:	HR Advisor
Review Frequency:	At least once a year
Next evaluation:	September 2027
Name:	JEH Modes
Position:	Managing Director
Date:	October 27, 2026