



ESG POLICY
December 2019

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INTRODUCTION, MISSION AND VISION

To Engage and Mobilize Tomorrow's Workforce Responsibly and Sustainably

The following is the Environment, Social and Governance ("ESG") policy of ASGN Incorporated (ASGN) and division, CyberCoders Inc. ("CyberCoders") and outlines the framework, approach, and expectations for CyberCoders.

CyberCoders is known for our unmatched ability to deliver the right candidate fast. As a leading direct hire firm with offices across the U.S., we focus on proactively building a network of highly skilled professionals. We strive to purposefully connect our clients to the talent they need while providing opportunities for our candidates. Together, we drive careers forward.

We believe that acting responsibly – with respect to the environmental and social impacts of our activities and the governance of our business (together known as "ESG factors") – can mitigate risk and have a positive influence on our long-term financial performance.

CyberCoders' ESG commitment reflects our responsibility to our stockholders, by showing our commitment to our clients, employees, contractors, and the communities in which we operate. Clear dialogue with our stakeholders is important to building strong relationships, maintaining trust, and enhancing our business performance. We engage with a broad range of stakeholders including our stockholders, clients, employees, contractors, governments and regulators and the wider community.

Our commitment also reflects our belief that a strong ESG approach contributes to better management of risks and opportunities, resulting in improved long-term value creation. Moreover, many of our stockholders and other key stakeholders expect companies to disclose information describing the frameworks, systems, and practices used to manage material ESG factors – as well as the outcomes thereof.

How companies manage ESG factors is becoming as important as traditional financial metrics when evaluating corporate performance. CyberCoders incorporates its sustainability objectives into its overall business strategy. The objectives are implemented through a range of policies and guidelines that address the following: data and innovation,

human capital, responsible business conduct and workforce and community well-being. This is done throughout our operations and reporting processes.

As part of our efforts to create a comprehensive ESG policy for ASGN and its division CyberCoders, we analyzed Dow Jones Sustainability Index (DJSI), Institutional Shareholder Services (ISS), Sustainability Accounting Standards Board (SASB) and Sustainalytics for our assessment and to guide our ESG framework.

TO WHOM THIS POLICY APPLIES

CyberCoders considers ESG factors throughout our operations. Recognizing that the relative importance of ESG factors varies across industries, geography, and time, our consideration of ESG is tailored to specific contexts. CyberCoders' focus is on ESG factors that are, or could become, material to our long-term financial performance.

DEFINITION OF ESG

ESG processes and procedures focus on 'non-financial' performance indicators (factors) that address the Company's approach towards responsible operations and our impact on society and the environment, as well as other ethical and corporate governance considerations.

We recognize the importance of identifying, assessing, and managing ESG factors material to CyberCoders. Failure to address material ESG factors properly could expose CyberCoders to significant economic, operational, legal, regulatory, or reputational risks. Conversely, addressing ESG factors proactively could help us identify strategic opportunities, meet competitive challenges, and adapt to evolving market conditions.

Consideration of ESG factors can also support the success of a merger or acquisition process from initial due diligence through implementation—helping to mitigate the reputational and financial risk associated with potential ESG crises and positioning CyberCoders to build competitive advantage through better integration of its sustainability strengths.

While it is not possible to define all categories of material ESG information, in general, information is regarded as material if there is a likelihood that it would be considered important to key stakeholders in making a decision regarding the purchase or sale of the ASGN securities., CyberCoders' parent company.

PRINCIPLES

CyberCoders seeks to:

- Anchor our approach to ESG to our mission and purpose
- Manage ESG considerations and risks effectively
- Comply with both the letter and the spirit of the law, wherever it applies
- Act with integrity at all times in our dealings
- Ensure in our global communities, we respect human rights and ensure no exploitation of our employees or contractor candidates
- Ensure a culture of non-discrimination (whether on the grounds of gender, race disability or otherwise) and prioritize diversity and inclusion in our practices
- Ensure there is no bribery or corruption in any of our dealings
- Act responsibly with respect to the environment, aiming for a sustainable approach to the use of resources
- Act responsibly and strive to make positive contributions to the social fabric of the communities in which we operate
- Ensure that our management structures and policies support transparency, accountability, equality, and probity in the management of our businesses
- Build long term financial value for our stakeholders and clients through our ESG policies

ESG FRAMEWORK

CyberCoders structures its ESG approach around four focus areas. These focus areas reflect the ESG risks and opportunities most material to us and to our key stakeholders:

| | |
|--------------------------------|-----------------|
| • Data & Innovation | • Human Capital |
| • Responsible Business Conduct | • Society |

ESG GOALS

ESG factors (or topics) that fall within these four focus areas include:

DATA & INNOVATION

- **Information Privacy**
 - a. Ensuring that sensitive client, employee, or contractor-related information is handled in a manner that protects personal privacy

- **Data Security**
 - a. Measures taken to prevent the breach, loss, or misuse of sensitive data, intellectual property, or digital assets

- **Digital Transformation & Innovation**
 - a. The strategic use of data science tools and techniques to generate insights from internal and third-party data that helps CyberCoders stay ahead of market trends and the future of the workplace
 - b. Strategically understanding key clients' needs and proactively supporting and advising on methods to improve their respective environmental, social, and governance practices
 - c. Developing and delivering new, market-leading services and solutions that address the needs of CyberCoders' clients
 - d. Building resilient workforce services and solutions that increase efficiency and preserve resources while enhancing economic value

HUMAN CAPITAL

- **Diversity and Inclusion**
 - a. Policies and practices that create a global workplace environment for all employees (regardless of differences in backgrounds, beliefs, abilities, and experiences) to fulfill their potential

- **Working Practices and Employee/Contractor Well-being**
 - a. Activities that ensure the health, safety, and well-being of all employees and contractors within and outside of the workplace, as well as initiatives that lead to a more positive and productive workforce within CyberCoders
 - b. CyberCoders' commitment to creating a workplace where all employees are safe and their rights are protected

- **Employee and Contractor Engagement, Retention and Development**
 - a. Policies and practices that attract, retain, and develop high-quality employees and contractors with the right skills to deliver on current and future business needs, as well as equipping employees and contractors with the skills necessary to succeed in a fast-changing market

RESPONSIBLE BUSINESS

- **Corporate Governance**
 - a. Maintaining policies and practices that comply with relevant laws and regulations, enabling CyberCoders to secure contracts with clients across sectors
 - b. Manage and operate our business by taking all of our stakeholders' needs and values into consideration for long-term growth and sustainability.
- **Environmental Management (including Carbon & Climate)**
 - a. Policies, systems, and procedures that ensure CyberCoders effectively manages and mitigates negative environmental impacts arising from everyday operations
 - b. Improving our operating performance by reducing energy, water use, waste, and carbon emissions while lowering operating costs
- **Ethics and Integrity**
 - a. Commitment to uphold principles and ethical standards in business conduct (e.g. fraud, anti-bribery and corruption), and adherence to legislation and voluntary standards
- **Human Rights**
 - a. Ensuring basic rights and freedoms based on important principles like dignity, fairness, respect and equality

SOCIETY

- **Community Investment**
 - a. Create a positive impact for our stakeholders and community through meaningful engagement, contribution and volunteerism

- **Socioeconomic Impact**
 - a. The positive impact that CyberCoders' business and philanthropic activities have on the communities it operates in

CYBERCODERS CORPORATE RESPONSIBILITY TEAM

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REFERENCES TO OTHER RELEVANT POLICIES AND DOCUMENTS

More information about the Company's approach to ESG is available in the documents below:

- [ASGN Code of Business Conduct and Ethics](#)
- [ASGN 2018 Annual Report](#)