

ASGN Incorporated
ESG Policy 2020



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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 and its divisions (“ASGN”) and outlines the framework, approach, and expectations of ASGN.

ASGN Incorporated (NYSE: ASGN) is a global leader in workforce services and solutions, and together with our network of best-in-class companies, we are unified by a common purpose: to engage and mobilize tomorrow's workforce.

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.

Our 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. ASGN incorporates its sustainability objectives into its overall business strategy as well as throughout each of its divisions, operations, and reporting processes. The objectives are implemented through a range of policies and guidelines that include but are not limited to the following: data and security; professional integrity and corporate governance (responsible business); employee training and engagement; workforce diversity, equity, and inclusion; workforce wellbeing; philanthropy (social responsibility); and environmental responsibility.

Methodology

ASGN's comprehensive ESG policy is designed to be relevant to our business model and applicable across all of our brands to ensure adherence to the same principles. We performed an extensive gap analysis and competitor benchmarking to inform and shape our ESG policy and goals. We used the following leading ESG ranking and ratings agencies to guide and assess our strategic ESG reporting framework: the Dow Jones Sustainability Index (DJSI), Institutional Shareholder Services (ISS), MSCI, the Sustainability Accounting Standards Board (SASB), and Sustainalytics.

To Whom this Policy Applies

ASGN considers ESG factors throughout our operations and across our divisions, including Apex Systems, Creative Circle, CyberCoders, Oxford Global Resources, and ECS. Recognizing that the relative importance of ESG factors varies across industries, geography, and time, our consideration of ESG is tailored to specific contexts. ASGN's 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 “nonfinancial” 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 ASGN. Failure to address material ESG factors properly could expose ASGN 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 ASGN to build competitive advantage through better integration of its sustainability strengths.

ESG 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 ASGN securities.

Our ESG Principles

ASGN 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 “nondiscrimination” and prioritize Diversity, Equity, and Inclusion (DEI) 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

Our ESG Framework

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



Our ESG Goals

ESG factors (or categories) that fall within the following five focus areas:



I. Data and Security



Risk Management

- Ensure the safety and privacy of sensitive information relating to our clients, employees, and consultants
- Take measures to prevent the breach, loss, or misuse of sensitive data, intellectual property, or digital assets

Security Team, Employee Training, and Audits

- Provide a full-time in-house dedicated Enterprise Security Council as well as third-party services to augment our security provisions
- In addition to onboarding and HIPAA-related trainings, provide data privacy and security training to all employees on a quarterly basis
- Meet all legislative and regulatory requirements and audit recommendations

Collection, Use, and Control of Customer Information

- Ensure sensitive client, employee, or contractor-related information is handled in a manner that protects personal privacy

Regular Reporting

- ASGN's Chief Information Officer and the Enterprise Security Council regularly brief the Board on cybersecurity strategy and technology projects. In addition, the Board is briefed on all incidents, project risks and business needs as well as the Company's technology investment roadmap. The Board established a Strategy and Technology Committee in 2019 that meets regularly to focus on and govern these matters.



II. Responsible Business



Ethics and Integrity

- Uphold principles and ethical standards in business conduct (e.g., fraud, anti-bribery, and corruption), and adherence to legislation and voluntary standards
- Ensure basic rights and freedoms based on important principles like dignity, fairness, respect, and equality

Employee Training and Policies

- Provide and require annual training on our Code of Business Conduct and Ethics Policy, and acknowledgement of other key policies

Accountable Corporate Governance

- Maintain policies and practices that comply with relevant laws and regulations, enabling ASGN to secure contracts with clients across sectors
- Manage and operate our business by taking all of our stakeholders' needs and values into consideration for long-term growth and sustainability

Professional Integrity Related Proceedings

- A summary of the Company's material legal proceedings are reported in our [Form 10-K](#)
- The Company has not reported any such proceedings in 2020



III. Our Workforce



Workforce Diversity, Equity, and Inclusion

- Provide a highly diverse, equitable, and inclusive workplace where all employees are safe and their rights are protected
- Take ownership of our problems and challenges and be thoughtful, responsive, and accountable to our colleagues, customers, and shareholders
- Continually update policies and practices that create a global workplace environment for all employees (regardless of race, ethnicity, gender, gender identity, sexual orientation, age, or physical abilities, or differences in backgrounds, beliefs, and experiences) to fulfill their potential

Wellbeing and Working Practices

- Wellness
 - Provide programming that ensures the health, safety, and wellbeing of all employees and contractors
- Employee Engagement
 - Provide and support initiatives conducive to maintaining a positive and productive workforce
- Training and Development
 - Continually update 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



IV. Social Responsibility



Giving Back

- Create a positive impact for our stakeholders and community through meaningful engagement, contribution, and volunteerism
- Create positive impacts on local communities through ASGN's philanthropic activities



V. Environmental Responsibility



Sustainability Roadmap

- Create and maintain policies, systems, and procedures that ensure ASGN effectively manages and mitigates negative environmental impacts arising from everyday operations, including tracking our carbon emissions
- Improve our operating performance by reducing energy, water use, waste, and carbon emissions while lowering operating costs

ASGN Corporate Responsibility Contact

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References to Other Relevant Policies and Documents

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

- [Governance Documents](#)
- [Code of Business Conduct and Ethics](#)
- [2020 Annual Report](#)

About ASGN Incorporated

ASGN Incorporated (NYSE: ASGN) is one of the foremost providers of IT and professional services in the technology, digital, creative, engineering and life sciences fields across commercial and government sectors. Operating through its Apex, Oxford and ECS segments, ASGN helps leading corporate enterprises and government organizations develop, implement and operate critical IT and business solutions through its integrated offering of professional staffing and IT solutions. ASGN's mission is to be the most trusted partner for companies seeking highly skilled human capital and integrated solutions to fulfill their strategic and operational needs. For more information, visit us at [asgn.com](https://www.asgn.com).