



KELLY SERVICES INC UK MODERN SLAVERY TRANSPARENCY ACT STATEMENT

Introduction

The International Labour Organization (ILO) has estimated that 49.6 million people were living in modern slavery in 2021. Kelly, as well as its subsidiaries, recognizes the transparency requirements of the UK Modern Slavery Act and supports the UN's Guiding Principles on Business and Human Rights and their requirement to 'know and show' that we are working to respect all human rights.

We believe increased transparency, improved oversight, detailed compliance, and other checks and balances are necessary and effective means of ensuring the protection of human rights around the world.

Given the worldwide span of our workers, clients, suppliers, and partners, we recognize the global reach of our business practices and our public accountability. Here at Kelly, we take pride in the positive impact we have on our communities and our advocacy for better quality work. We are committed to connecting people to work in ways that enrich their lives.

We are equally committed to our responsibility to respect and protect human integrity and dignity by uncovering abusive behavior and playing a positive role in stopping and fighting such behavior in our business, supply chain, and any other areas we can impact. This is especially true with our commitment to identify, mitigate and eradicate modern day slavery; namely human trafficking and forced labor.

Our Business

As an industry leader in providing workforce solutions to a diverse group of local, regional, and global clients, Kelly (Nasdaq: KELYA, KELYB) and its subsidiaries, offer a comprehensive array of outsourcing and consulting services, as well as world-class staffing on a temporary, temporary-to-hire, and direct-hire basis. Kelly directly employs over 7,000 people and nearly 300,000 temporary talent around the world in addition to having a role in connecting thousands more with work through its global network of talent suppliers and partners.

Our supply chain is essentially divided into suppliers who provide personnel to deliver services for our clients and the suppliers of goods and services to Kelly.

Statement and Policies

Kelly's Policy Statement Regarding Human Trafficking and Slavery reads "(Kelly) has a zero-tolerance policy prohibiting trafficking in persons". Kelly prohibits retaliation against anyone who files a complaint or reports a suspected violation of this policy. Kelly's Code of Business Conduct and Ethics, Human Rights Policy, and Corporate Sustainability Policy Statement are among additional Kelly policies that uphold this commitment.

Kelly covers this topic through various policies and codes of conduct that we abide by:

Our Business

- Policy Statement Regarding Human Trafficking and Slavery
- Human Rights Policy
- Employment of Minors Policy
- Code of Business Conduct and Ethics
- Corporate Sustainability Policy Statement
- World Employment Confederation Code of Conduct
- United Nations Global Compact Guiding Principles (Signatories)

Our Suppliers

- World Employment Confederation Code of Conduct
- Supplier Code of Conduct

Assessment of Risk and Audit of Suppliers

Kelly acknowledges the risk of forced labor occurring in global supply chains and understands that there are some parts of our business and supply chains that will have a higher risk of modern slavery occurring.

Kelly has determined that at this time, the highest risks based on function and geography fall within our APAC operations, with EMEA being rated a medium risk. The principal areas of our business at risk supply workers in the following sectors:

- Electronic assembly, agriculture, manufacturing, and entertainment are among the sectors with the most concern.

Actions

Kelly is taking action to ensure slavery and human trafficking are not taking place in our business or supply chain with the below actions:

Our Business

- Global Human Trafficking and Slavery Policy and Human Rights Policy
- Date of birth verification process in applicant tracking system
- Development of KPIs to be tracked annually and reported publicly
 - % acknowledgement of Code of Business Conduct and Ethics
 - 2022: 95% acknowledgement
 - % acknowledgement of Supplier Code of Conduct
 - 2022: 99.97% of suppliers have signed the new Supplier Code of Conduct since 2021 inception
 - % acknowledgement of Policy Statement Regarding Human Trafficking and Slavery
 - 2022: 95% acknowledgement
- Internal branch health checks on the work instructions and on-boarding procedures which include verification measures, such as:
 - Right to Work
 - Employment contract
 - Local registration is common item in compliance audits
- Kelly's Business Conduct and Ethics Reporting Program Hotline

Our Suppliers

- The Supplier Code of Conduct sets the standards our global supplier network agrees to adopt in providing safe working conditions, ensuring workers' respect and dignity, and abiding with the International Human Rights Principles and Managing Business and Professional Ethics.
- Partnering with our customers to go above and beyond with specific additional services on their behalf to ensure Talent Supply Chain integrity. To accomplish this, more specialized detailed supplier audits were conducted.
- As part of the on-boarding procedure to become an APPROVED supplier, all suppliers are required to read, accept, and abide by our Supplier Code of Conduct.
- Kelly has a designated Supplier Compliance and Administration function that sits as a gatekeeper between Kelly and all its 4,400 active global suppliers.
- Kelly performs regular compliance audits of our suppliers, including requiring suppliers to share their code of conduct policies with Kelly for us to review.

Training

Kelly implemented training and capacity building activities regarding slavery and human trafficking:

- All new employees receive information relating to modern slavery as part of their onboarding process with Kelly.
- All employees are required to read and acknowledge our policies and statements as they are related to human trafficking and slavery.
- Global internal communications educating on both modern slavery, and our zero-tolerance policy, including steps on reporting abuses.
- Development of risk escalation and assessment practices within our compliance functions.

Assessment of Effectiveness

Kelly's position, as well as our overall approach to managing our compliance with this Act, continues to evolve.

Kelly will continue to review the following indicators to assess the effectiveness of the steps we are taking:

- Completion percentage of our policy and code acknowledgements
- Completion of Supplier Code of Conduct acknowledgements
- Percentage of supplier personnel subjected to audit
- Reports of possible incidents of modern slavery



Peter Quigley, President and CEO of Kelly

Approved: November 8, 2023