



Kelly Services, Inc. UK Modern Slavery Transparency Act Statement

Introduction

The International Labour Organization (ILO) has estimated that 21 million men, women and children are victims of forced labor globally. Kelly Services, Inc., as well as its subsidiaries, ("Kelly") recognizes the transparency requirements of the UK Modern Slavery Act and they are consistent with our support of 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 Services, we take pride in the positive impact we have on our communities and for our commitment to improve lives and wellbeing through providing work and advocating for better quality jobs.

We are equally committed 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 a global leader in providing workforce solutions, Kelly Services, Inc. (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 nearly 500,000 people 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 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 and Kelly's Corporate Social Responsibility Policy Statement are among additional Kelly policies that uphold this commitment.

Kelly's Corporate Social Responsibility covers this topic through various policies and code of conducts that we abide to:

Our Business

- Policy Statement Regarding Human Trafficking
- Employment of Minors Policy

- Code of Business Conduct and Ethics
- Corporate Social Responsibility Statement
- World Employment Confederation Code of Conduct

Our Suppliers

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

Assessment of risk and audit of suppliers

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

- Electronic assembly, agriculture, manufacturing and entertainment are among the sectors most concerned.
- Migrant workers and indigenous people are particularly vulnerable to forced labor.

Actions

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

Our Business

- Development of a Global Human Trafficking Policy
- Employment verification process in eRegistration
- Development of KPIs to be tracked annually & reported publicly
 - % Acknowledgement Of Code Of Business Conduct And Ethics
2016: 94% acknowledgement
 - % Acknowledgement Of Supplier Code Of Conduct
2016: 100% newly onboarded suppliers
 - % Acknowledgement Of Policy Statement Regarding Human Trafficking
2016: 95.5% 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 are common items in compliance audits
- Kelly Services Business Conduct & Ethics Reporting Program hotline

Our Suppliers

- Development of a robust Supplier code of conduct and requiring acknowledgement
- Kelly Services has a designated Supplier Compliance & Administration function that sits as a gatekeeper between Kelly and all its 4,700 suppliers globally
- Regular compliance audits Kelly performs on suppliers
- As part of the on-boarding procedure to become an APPROVED supplier, all suppliers are required to:
 - Acknowledge Supplier Code of Conduct
 - 100% of newly on-boarded suppliers since October 1, 2016

- Share their own Code of Conducts with us for review
- Partnering with our Customers to go above and beyond with specific additional services on their behalf to ensure TSC integrity. To accomplish this more specialized detailed supplier audits were conducted.

Training

Kelly Services, Inc. implemented training and capacity building activities about slavery and human trafficking:

- All new employees receive information relating to Modern Slavery as part of their onboarding process with Kelly Services
- All employees are required to read and acknowledge our policies and statements as they are related to Human Trafficking
- Global internal communications educating on both Modern Slavery but also on our 0-tolerance policy including steps on reporting abuses

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 in order 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 suppliers of personnel subjected to audit
- Reports of possible incidents of Modern Slavery



George Corona, President and CEO of Kelly Services, Inc.