



KELLY SERVICES INC UK MODERN SLAVERY TRANSPARENCY ACT STATEMENT

This statement is made on behalf of Kelly Services, Inc. and its subsidiaries (collectively "Kelly"), pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our anti-slavery and human trafficking statement for the financial year ending December 31, 2023.

Beliefs and Commitments

In 2022, the International Labour Organization (ILO) estimated 49.6 million people were living in modern slavery in 2021 with 27.6 million of them in forced labor. Further, of those in forced labor, 17.3 million were exploited in the private sector and 12% were children. This is not acceptable.

We believe increased transparency, improved oversight, detailed compliance, and other checks and balances are a necessary and effective means of ensuring the protection of human rights around the world. We recognize the transparency requirements of the UK Modern Slavery Act and support the United Nation's Guiding Principles on Business and Human Rights and their requirement to 'know and show' that we are working to respect all human rights.

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. As stated in our Noble Purpose, 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 stopping any 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, Structure, and Supply Chains

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's operating model comprises four reportable segments focused on North American specialty outcome-based and staffing services, global Managed Services Provider (MSP), and Recruiting Process Outsourcing (RPO) solutions. Our business segments are Professional & Industrial; Science, Engineering & Technology; Education; and Outsourcing & Consulting Group. Each operate under a Business Unit President.

Kelly's MSP, RPO, and functional service provider business maintains a global capability in the North America, Asia Pacific, Europe, Middle East, and Africa regions. In 2023, Kelly announced the sale of our EMEA staffing operations, and finalized this transaction in early 2024.

Diversity, Equity, and Inclusion is a central tenet to Kelly's operations internally and is a value driver for our clients. To underscore Kelly's commitment to DEI, our Chief Diversity Officer position sits in Kelly's senior leadership team and heads a dedicated team of leaders who together are driving a multi-year strategy to integrate diversity, equity, and inclusion into our workplace, among our workforce, within our supply chain, and within the marketplace.

Our supply chain is a network of suppliers and partners who provide personnel to deliver services for our clients and the suppliers of goods and services purchased by Kelly as part of our operational delivery.

Kelly directly employs over 6,400 people and nearly 300,000 temporary talent around the world in addition to having a role in connecting thousands more with work through our global network of talent suppliers and partners.

As a provider of talent solutions, Kelly's purchased or leased items include items such office space, equipment and supplies, computer hardware, software, data services, recruitment expenses such as job boards, advertising, screening services, and business travel expenses including airfare, lodging, and food.

Statement and Policies

Kelly's Policy Statement Regarding Human Trafficking and Slavery reads "(Kelly)" has a zero-tolerance policy prohibiting trafficking in persons". Kelly does not and will not permit its employees, subcontractors, vendors, suppliers, or other entities it does business with to engage in any form of human trafficking or modern slavery. We have communicated specific guidelines on actions that may be considered human trafficking and slavery. 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. In addition, we safeguard minors with our Employment of Minors Policy and corresponding support processes. Kelly aligned with the World Employment Confederation Code of Conduct and is a proud signatory of the United Nations Global Compact Guiding Principles.

We expect the same vigilance from our suppliers, as stated in our Supplier Code of Conduct, which aligns with the World Employment Confederation Code of Conduct.

Risk Assessment, Prevention and Mitigation

Kelly acknowledges the risk of forced labor occurring in global supply chains and understands that there are portions of our business and supply chains that 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 rated a medium risk. The principal areas of risk in our business functions supply workers in the electronic assembly, agriculture, manufacturing, and entertainment sectors.

We continue to use global data from reputable sources to understand the risks associated with people's access to political rights as well as the risk of corruption in countries where we may supply talent directly or through our supply chain.

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:
 - % Acknowledgment of Code of Business Conduct and Ethics
 - 2023: 93.5% acknowledgment
 - % Acknowledgment of new Supplier Code of Conduct since 2021 inception
 - 2023: 90% acknowledgment
 - % Acknowledgment of Policy Statement Regarding Human Trafficking and Slavery
 - 2023: 93.5% acknowledgment
- Internal branch health checks (audits) on compliance with work instructions and on-boarding procedures which include verification measures, such as right to work and employment contracts where applicable or other local registration of compliance activities.

- Kelly has a third-party, independently-managed, integrity hotline to facilitate the confidential and anonymous reporting of concerns by employees, customers, and suppliers. We encourage all individuals associated with Kelly to report any unethical or unsafe behavior through Kelly Services' Business Conduct & Ethics Reporting Program at 877.978.0049 or Kellyservices.ethicspoint.com without fear of retaliation.
- Kelly's incident management system ensures that all concerns are investigated by a dedicated team of professionals to substantiate the incident and identify and implement any applicable remediation. Remediation activities include documented warning, suspension, or removal of suppliers from Kelly supply chain, reporting to local authorities, and support to individuals impacted by the unacceptable behavior or conditions, if applicable.
- In addition to immediate investigation and action, for transparency and governance, higher severity substantiated claims are reported to Kelly's Enterprise Risk Management function as well as the Audit Committee of Kelly's Board of Directors.

Our Supply Chain:

- Kelly has a designated Supplier Compliance and Administration function that functions as a gatekeeper between Kelly and all its 4,400 active global 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. 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.
 - To further our commitment to compliance and management of suppliers, new technology implemented in early 2024 disallows movement to fully approved supplier status without signature acceptance of our Supplier Code of Conduct.
- Kelly partners with its customers supporting additional framework or methodologies committed to the rights and well-being of workers and communities worldwide affected by global supply chains. This may include evidentiary audits and education of suppliers to create policies and assess risks within their organization.
- Kelly performs regular compliance audits of our suppliers, including requiring suppliers to share their code of conduct policies with Kelly for 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 on an annual basis 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 and Looking Forward

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 subject to audit
- Reports of possible incidents of modern slavery
- Looking forward, Kelly recognizes the need to continuously fortify risk assessments and governance within its supply chain. This involves meticulous examination of how we align our work with customer and suppliers and use data-driven insights to assess and monitor impact across our supply chain.



Peter Quigley, President and CEO of Kelly
Approved by Board of Directors: May 8, 2024