

# **ANTI-HARASSMENT POLICY**

#### **Purpose**

The purpose of this document is to inform Kelly employees and U.S. subsidiaries (collectively referred to as "Kelly") of Kelly's Anti-Harassment Policy.

### **Persons Affected**

- All U.S. Kelly employees, customers, and suppliers
- Any other persons with whom Kelly employees have contact through their employment

#### Policy

Kelly is committed to maintaining a work environment that is free from harassment. Kelly will not tolerate harassment of or by its employees. All employees are expected to help ensure the work environment remains free of harassment. Upon learning of a situation that may violate this policy, Kelly will conduct a prompt and thorough investigation. Kelly will keep information regarding the alleged harassment as confidential as permitted by the investigation process or local, state, or federal law. If it is determined that a violation of this policy has occurred, Kelly will take appropriate remedial action to stop any prohibited harassment and to prevent future harassment. This may include disciplinary action up to and including termination of employment. Kelly will not tolerate retaliation against anyone who has expressed a good faith concern about harassment or who has participated or cooperated in an investigation.

#### Definitions

The term "harassment" is used in this policy to refer to both sexual and other forms of harassment. Below are definitions of sexual and other forms of harassment, as well as examples of conduct that may constitute harassment. (These lists are examples only; they are not all-inclusive.)

- **A. Sexual Harassment** Sexual harassment is unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when submission to such conduct:
  - a) Is made a condition of employment,
  - b) Is made the basis for employment decisions, or
  - c) Unreasonably interferes with an individual's ability to perform their job duties or otherwise creates an offensive or hostile working environment.

The following are examples of conduct that may constitute sexual harassment:

- Unwanted physical touching
- Telling sexually explicit jokes or stories
- Making lewd or offensive comments or gestures
- Displaying sexually suggestive objects, cartoons, or pictures
- Sending sexually explicit messages, images, emojis, or similar items by letters, notes, electronic mail, telephone, text message, social media, mobile application, or similar platforms.
- Making offensive comments about an employee's body, physical appearance, or clothing
- Using terms of endearment (e.g., "dear" or "sweetheart") when referring to employees of one sex
- Repeatedly asking a co-worker for a date or meetings outside of working hours after they have indicated an unwillingness to go

**B.** Other Forms of Harassment – Other forms of prohibited harassment include offensive comments or conduct pertaining to a person's race, ethnicity, religion, creed, ancestry, national origin, age, physical or mental disability, sexual orientation, gender, gender identity, gender expression, marital status, veteran status, or any other characteristic protected by local, state or federal law.

Such conduct may include, but is not limited to:

- Making gestures, threats, derogatory comments, or slurs that may be offensive to individuals in a particular group
- Bullying behavior that is threatening, intimidating, verbally abusive or results in other disruptive actions in the workplace
- Sending messages, images, emojis, or similar items by letters, notes, electronic mail, telephone, text message, social media, mobile application, or similar platforms, that may be offensive to individuals in a particular group
- Displaying derogatory objects, photographs, cartoons, calendars, or posters
- **C. Scope of Anti-Harassment Prohibition** Harassment in violation of this policy can take place anywhere or anytime. Harassment prohibited by this policy is not just harassment that occurs within the four walls of the building in which Kelly employees physically work. For example, in person interactions, calls, texts, emails and social media posts can constitute harassment, even if they occur outside the physical workplace or outside of work hours, or on personal devices.

## Responsibilities

All Kelly employees are expected to help ensure the work environment remains free of harassment. Any employee who believes they are being subjected to harassment by a Kelly employee or non-employee, or who have witnessed harassment of or by another Kelly employee or non-employee, has a responsibility to promptly report the matter through one of the means identified in the "Reporting Incidents of Harassment" section of this policy. Upon learning of any alleged harassment, Kelly management will promptly investigate the matter and take appropriate steps, which may include disciplinary action up to and including termination of employment.

## **Reporting Incidents of Harassment**

Any Kelly employee (i.e., full-time, part-time, leased, managed service, or on assignment with a Kelly customer) who believes that they have been harassed by a Kelly employee or non-employee, or who have witnessed harassment of or by another Kelly employee or non-employee, should report the alleged harassment to one of the following:

- The **immediate Kelly manager** (i.e., an officer, director, supervisor, or Kelly Representative) of the employee who is reporting the alleged harassment
- A Kelly Human Resources representative at the Kelly HR Knowledge Center 1-877-301-8460 or HRKnowledgecenter@kellyservices.com
- The Kelly Services' Business Conduct & Ethics Reporting Program at 1-877-978-0049 or <u>https://secure.ethicspoint.com/domain/media/en/gui/82243/index.html</u>. This program is administered by a third party.

### Contact

Contact the Kelly Services' Business Conduct & Ethics Reporting Program at 877-978-0049 or https://secure.ethicspoint.com/domain/media/en/gui/82243/index.html.