

# Supplier Code of Conduct

Released June 2021



**Kelly**

# Table of contents.

|  |    |
|--|----|
| Supplier Code of Conduct Introduction                          | 3  |
| An Agreement for Partnership                                   | 4  |
| Relationship and Partnership Commitment                        | 4  |
| What having standards means and how it affects our partnership | 5  |
| Supplier Code of Conduct Standards                             | 7  |
| Inclusive Hiring Practices                                     | 7  |
| Anti-discrimination  | 7  |
| Child Labor  | 8  |
| Forced and Compulsory Labor                                    | 8  |
| Anti-harassment and Workplace Violence                         | 9  |
| Benefits   | 9  |
| Freedom of Association and Collective Bargaining               | 9  |
| Freedom of Thought and Expression                              | 10 |
| Anti-Bribery and Corruption                                    | 10 |
| Disclosure of Information                                      | 10 |
| Wage and Hour Compliance                                       | 10 |
| Intellectual Property  | 11 |
| Business Continuity/Disaster Recovery Plan                     | 11 |
| Financial Sustainability                                       | 11 |
| Health and Safety  | 11 |
| Environmental  | 12 |
| Cyber Security and Information Security                        | 13 |
| Documentation and Recording                                    | 14 |
| Risk Assessment  | 14 |
| Assessments, Audits, and Corrective Plans                      | 14 |
| Guiding Principles, Standards, and Procedures                  | 15 |
| Appendix   | 18 |
| Change History   | 18 |



## Introduction.

Founded by William R. Kelly in 1946, Kelly® has provided workforce solutions to customers in a variety of industries throughout its history. Our range of workforce solutions and geographic coverage has grown steadily over nearly 75 years to match the needs of our customers. It began with office services, call center, light industrial, and electronic assembly staffing. Today, our expertise also spans an array of outsourcing and consulting solutions—including recruitment, human resource management, vendor management, and outplacement services on a global basis.

Since our founding, Kelly has always set high standards for the way we conduct business. Our culture and values are rooted in service, integrity, and taking personal responsibility for our actions, outcomes, and reputation. Kelly is committed to sustainable development and doing the right thing, including conducting ourselves in a legal, ethical, and trustworthy manner. We take pride in doing business with honesty and integrity and respect the value of ethical business conduct. Our global Network of Suppliers is one of our strongest competitive advantages, but also one of our biggest responsibilities. Our global Network is an important key to providing the commitments and principles we have set forth, and we expect all of us to hold ourselves to high values of legal, social, safety, ethical, and environmental responsibility.

This **Supplier Code of Conduct** sets the standards our global Supplier Network agrees to adopt in relation to providing safe working conditions, ensuring Workers are treated with respect and dignity, managing business and professional ethics, and sustaining environmental impacts.

For additional insight into the list of all defined terms (for example, “Supplier” or “Network”), in this document see the attached Supplier Code of Conduct Appendix.



# An agreement for partnership.

## Relationship and Partnership Commitment

Kelly is committed to creating a Network ecosystem and practices in which we foster an environment where our mutually beneficial relationship can thrive together through shared accountability. Below are additional details about doing business with Kelly:

- **Network Ecosystem**

When you partner with Kelly, you are aligning with an organization with a proven commitment to not only your growth and engagement, but your business growth overall—whether you provide talent, goods, or services.

- **Shared Accountability**

Exceptional supply chain Networks embody a shared commitment to responsible supplier management via a robust Supplier Code of Conduct, as well as continuous self-assessments and audit processes to ensure effective, compliant, and ethical operations.

- **Everyone Thrives**

We match exceptional suppliers and the talent they represent to world-class clients and choose outstanding partners for a myriad of services as we solve some of the world's most complex workforce challenges. Our goals are to lead the industry in social responsibility, to create strong relationships and lasting value for Kelly and our Network, to strive for zero safety incidents, and to ensure comprehensive resilience through strong and proactive risk management.

Partnerships are the most successful when **mutual trust, respect,** and **clear expectations** are the foundation.

- **Mutual Trust**

The actions we take after we have identified a potential success, failure, risk, breach, or opportunity are how we hold each other accountable and maintain trust. Kelly highly values the reporting of concerns by individuals and will always protect the trust placed in us.

- **Mutual Respect**

The way we treat each other matters. Respect translates to treating each other with dignity and empathy. This translates to equitable behavior, open communication, and transparency, while actively listening, offering constructive feedback, and validating one another's successes. It also means we maintain our mutual esteem and professionalism even in an instance of a difference of opinion or approach.

- **Clear Expectations**

The nature of our business together means that we will experience mutual successes and failures. It is our commitment to not expect more of our Suppliers than we expect of ourselves. By adhering to this Supplier Code of Conduct, our Network is measured against the very same criteria that we apply toward our own professional and ethical conduct.



# What having standards means and how it affects our partnership.

## What is the Supplier Code of Conduct?

The Supplier Code of Conduct outlines the minimum requirements that all Suppliers in our Network are required to meet to ensure that we can work together in an ethical and legally compliant manner. This Supplier Code of Conduct applies to all Suppliers in our Network. All Kelly Suppliers must comply with all Applicable Laws and Regulations relevant to its business in the countries where it is established and where it conducts its business. Failure on any Supplier's part to comply with the Supplier Code of Conduct will negatively impact its business relationships with Kelly, and in serious cases, may give grounds for termination of the relationship and/or legal action where Kelly or a Kelly customer has been aggrieved.

No code or policy can anticipate every situation that may arise. This Supplier Code of Conduct is intended to serve as a guide for a global audience of Suppliers operating in a variety of different legal and cultural environments and across industries or business service lines. We expect our Suppliers to take it upon themselves to understand the implications of this Supplier Code of Conduct in the places where they operate. We also expect Suppliers in our Network to raise any queries, issues, or concerns associated with complying with this Supplier Code of Conduct with Kelly in a timely and effective manner.

## Why do we have the Supplier Code of Conduct?

The Supplier Code of Conduct anchors our reputation and partnership. Adopting and complying with these principles fortifies our ability to perform our best work while meeting the legal and ethical standards we expect. We can be proud to stand together and celebrate our successes and challenges we have overcome, and to continue to innovate to thrive through accountability and doing the right thing.

## When and how?

When a Supplier joins the Kelly Supplier Network, they are required to register on our Kelly Supplier Portal. The Supplier is asked to read, accept, and abide by the Supplier Code of Conduct when registering. The Kelly Supplier Code of Conduct can be found on our external websites and through links available within the Kelly Supplier Portal. Each designated Supplier contact is responsible for sharing the Kelly Supplier Code of Conduct with colleagues who may not have access to the Kelly Supplier Portal.

When a Supplier joins the Kelly Supplier Network, their review and confirmation of the Supplier Code of Conduct will be required alongside the review and completion of any other documentation that is required in order to join the Network. Suppliers may also regularly be required to reaffirm their commitment to the Supplier Code of Conduct on a regular basis or in the event of updates to its content.

### How to make the right decision

Suppliers shall observe the highest principles of ethics, integrity, professional conduct, and fair practice in dealings with all parties and shall conduct their business in a manner designed to enhance the operation, image, and reputation of its own organization, its industry, of Kelly, or of our shared customers. It can be difficult to always know what the right decision is. Take a moment and ask yourself the following:

1. Is the conduct a violation of the law, the Supplier Code of Conduct, or your company policies?
2. Does the conduct appear unethical?
3. Could the conduct harm the reputation of you personally, your organization, Kelly, or our shared customers?

If the answers to any of the questions are yes, then speak up! We are partners. Kelly will do the right thing for you, too. Our support could come in a variety of ways but know that we are in your corner and are ready to support you with doing what is right.

### Who must follow the Supplier Code of Conduct?

All our Supplier Networks are required to follow the Supplier Code of Conduct.

### How to ask a question?

Please direct any questions regarding this Supplier Code of Conduct to our Supply Chain Enablement Team at one of the following regional email addresses.

|             |  |
|-------------|--|
| <b>AMER</b> | <a href="mailto:SCEAMER@KELLYOCG.COM">SCEAMER@KELLYOCG.COM</a> |
| <b>APAC</b> | <a href="mailto:SCEAPAC@KELLYOCG.COM">SCEAPAC@KELLYOCG.COM</a> |
| <b>EMEA</b> | <a href="mailto:SCEEMEA@KELLYOCG.COM">SCEEMEA@KELLYOCG.COM</a> |

### How the Supplier Code of Conduct will be audited or governed

Kelly is committed to promoting a positive global business environment and operating our business in a highly ethical manner. We require all our Suppliers to abide by our Supplier Code of Conduct. We expect our Suppliers to self-monitor to demonstrate compliance with the Supplier Code of Conduct, however, Kelly may audit Supplier's practices to confirm compliance with our Supplier Code of Conduct. Suppliers who behave in an unlawful way or who violate the Supplier Code of Conduct risk termination of their business relationship with Kelly.



# Supplier Code of Conduct Standards.

Below is a description of the level of quality or achievement expected from our Suppliers on a specific topic. Each section is a “Standard,” as defined in the Appendix. Please read and acknowledge by initialing each of the 20 Standards.

## Inclusive Hiring Practices

It is the policy of Kelly to protect the employment rights of qualified applicants and employees regardless of any individual’s race, color, age, marital status, veteran status, religion, national origin, genetic information, sexual orientation, gender, gender identity/expression, disability, pregnancy, or other protected categories under Applicable Laws and Regulations. The Suppliers should never make or support employment decisions based on these personal characteristics.

We expect all Suppliers that we do business with to provide equal opportunities based on skills and abilities, striving to create a workforce that reflects the diversity of the communities in which they operate. In many countries, there is a legal obligation to take affirmative action to promote hiring and advancement in employment among people within certain protected classifications, and we would encourage our partners to join us in embracing the opportunities for increased diversity that this provides. We believe doing so is the right thing to do and that it is beneficial not only for business, but for society. Suppliers agree to follow these same standards.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

## Anti-discrimination

All Suppliers are required to foster a workplace that embraces differences in viewpoints, cultures, race, age, disability, religion, national origin, ethnicity, sexual orientation, gender, and gender identity/expression. Hiring and employment practices will comply with all Applicable Laws and Regulations with respect to diversity and anti-discrimination and are encouraged to offer additional safeguards and/or protections for their workforce as needed.

Furthermore, the Suppliers will comply with all Applicable Laws and Regulations concerning the employment of persons with disabilities. Consistent with that commitment, Suppliers agree not to discriminate against qualified individuals with disabilities regarding application procedures, hiring, advancement, discharge, compensation, training, or other terms, conditions, and privileges of employment.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

## Child Labor

Kelly understands that opportunities may arise for the placement of minors under the age of 18 and has therefore implemented a policy to ensure its compliance with Applicable Laws and Regulations. Suppliers agree to comply with all Applicable Laws and Regulations regarding child labor, including those relating to minimum age limits, limitations of working hours, and prohibition against certain types of work. This policy is extended to all countries of operation and respects all internationally proclaimed human rights. Please click [here](#) for additional information from the International Labor Organization.

## Forced and Compulsory Labor

Suppliers agree that forced, bonded, or compulsory labor shall not be used, and all Workers shall be free to leave their engagement after reasonable notice as required by Applicable Laws and Regulations and relevant contract(s). Private employment agencies shall not charge, directly or indirectly, in whole or in part, any fees or costs to job seekers and workers for the services directly related to temporary assignments or permanent placement. Kelly does not and will not permit its staff, directors, subcontractors, or Suppliers to engage in any form of human trafficking. This includes, but is not limited to, the following trafficking-related activities:

- Using forced labor in the performance of any work or coercing any persons to perform work or activities under threat of penalty.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or driver's licenses.
- If required by Applicable Laws and Regulations, failing to provide an employment contract, recruitment agreement, or other required work document in writing and in a language that the employee understands.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_





### Anti-harassment and Workplace Violence

Kelly is committed to supporting work environments which promote individual dignity and mutual respect, and to following all applicable laws and legislation related to labor and human rights.

We support workplace environments that embrace inclusion and differences in viewpoints. Kelly strictly prohibits any hostile conduct directed at an individual, including but not limited to hostile conduct directed at their race, color, age, religion, ancestry, national origin, ethnicity, gender, sexual orientation, gender identity/expression, physical or mental disability, marital status, veteran status, or any other personal characteristic. Suppliers agree to embrace these same policies to ensure a safe, secure workplace and working conditions that promote health and well-being for all our employees.

Kelly has a zero-tolerance policy regarding violence in the workplace. To help protect our clients, Suppliers, partners, and employees, we have an obligation to immediately report any situation involving violence, threats, bullying, or intimidation, regardless of where this situation occurs. All our staff and directors are expected to ensure the work environment remains respectful, free of unacceptable behavior, and harassment free.

Every Supplier shares the responsibility for ensuring that their staff and directors are conducting themselves in accordance with our policies and for supporting respectful workplace behavior. Kelly requires that our Suppliers have policies and practices in place to support these goals, and to provide the resources and training needed to ensure these practices are met.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

### Benefits

All Suppliers must be aware of their obligation to establish and comply with human resources and benefit policies that are fully consistent with all Applicable Laws and Regulations.

Access to social benefits must not be unlawfully restricted or discontinued for disciplinary or other reasons. We encourage Suppliers to become proactively involved in constructive social dialogue at the local level to help promote and advance the adoption and improvement of social benefits for Workers.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

### Freedom of Association and Collective Bargaining

Kelly supports the rights of all workers and employers to freely and voluntarily join occupational associations and unions. All employees have the right to freedom of association, expression, opinion, and collective bargaining, in accordance with Applicable Laws and Regulations. Suppliers agree to comply with the same standards mentioned above and will allow their Workers to exercise their legal rights to freedom of association in the workplace in accordance with Applicable Laws and Regulations.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

### Freedom of Thought and Expression

Kelly is committed to fostering diverse workplaces that grant freedom of thought and expression within the scope of professional conduct and in accordance with Applicable Laws and Regulations. It is our talent's ability to create, seek, challenge the status quo, and innovate for the future. Suppliers agree to share our commitment to the free thought and expression of their Workers.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

### Anti-Bribery and Corruption

Kelly strictly prohibits all forms of bribery and corruption in accordance with Applicable Laws and Regulations. Suppliers agree to not, on behalf of themselves, Kelly, nor our shared customers, give, promise, offer, accept, agree to, or authorize payment of value or benefit, no matter how small, to any supplier, partner, vendor, customer, government official, or other person, for the purpose of improperly influencing a decision, securing an advantage, avoiding a disadvantage, or obtaining or retaining business, and shall otherwise conduct themselves in accordance with all Applicable Laws and Regulations regarding bribery and corruption. Individuals who engage in such acts expose themselves and their company to civil and/or criminal liability, significant reputational harm, and undermine the trust that our respective communities have placed in us.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

### Disclosure of Information

Suppliers agree to develop and enforce standards regarding corporate disclosure requirements that are consistent with Applicable Laws and Regulations. These standards include compliance with Applicable Laws and Regulations governing financial disclosures and reporting, securities laws and regulations, generally accepted accounting principles, non-governmental standards, and other Applicable Laws and Regulations governing corporate disclosures.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

### Wage and Hour Compliance

Suppliers are required to maintain awareness of their obligation to comply with, and establish employment policy practices consistent with, all Applicable Laws and Regulations related to the payment of wages for labor and employment. Pay and terms shall be fair and reasonable, calculated based on equitable, objective, and transparent principles and comply, at a minimum, with legal minimum wage or—where legal minimum wages are not established—with comparable market rates. Working hours shall, at a minimum, comply with local law. All are encouraged to provide Workers with a living wage and appropriate benefits when possible. The pay structure and schedule must be communicated to workers and shall meet legal requirements. Wages and benefits will be paid accurately, in a timely manner, and shall not be used as a disciplinary tool.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

### Intellectual Property

The appropriate management of intellectual property rights is a critical way to protect the key assets of any organization based on proprietary skill, technology, creativity, or knowledge. All Suppliers are required to respect the intellectual property rights of Kelly, our shared customers, and third parties, in accordance with all Applicable Laws and Regulations and their contracts with Kelly and our customers.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

### Business Continuity/Disaster Recovery Plan

Kelly recognizes that unplanned business interruptions resulting from natural disasters, power outages, fires, civil unrest, disease outbreaks, and other natural and man-made disasters can and do occur. Not only is preparedness for these situations critical to the interests of our shared customers, it is equally important to the health and safety of our respective workforces. Suppliers agree to develop and maintain a business continuity plan to support and protect their company and their Workers in the event of a man-made, natural disaster, or public health emergency (e.g., pandemic event).

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

### Financial Sustainability

Suppliers agree to self-monitor their financial health and to ensure that their business is sustainable. Suppliers are required to inform Kelly of any potential threats to their sustainability so Kelly may elect to develop contingency plans to prevent business disruption and/or detriment to Supplier's Workers. Suppliers without financial sustainability may be identified as potential high-risk suppliers to Kelly and may also be subject to financial audits. Those not meeting our requirements (through either self-reporting or audit review) will then be subject to additional measures, which may include a remediation process.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

### Health and Safety

Each of us must take personal responsibility for our own safety, the safety of our co-workers, and those for whom we are responsible. Suppliers agree to help protect, support, and prepare Workers for safe careers and to advocate on their behalf, including promoting workplace health and safety. Our approach to safety requires strong alignment on safety with our Suppliers. Pursuing excellence in workplace health and safety must be a constant. Kelly Suppliers agree to comply with all Applicable Laws and Regulations regarding workplace health and safety.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

## Environmental

Kelly is committed to its responsibility to protect and maintain our planet for future generations, and we acknowledge the importance of addressing climate change. Our commitment to the environment extends to our staff, Suppliers, and the communities in which we operate. We strive to improve our environmental performance over time, and we work hard to reduce our impact on the environment. We are committed to establishing companywide environmental policies and practices to reduce our ecological footprint. Suppliers are required to adopt their own environmental sustainability goals, while complying with all Applicable Laws and Regulations regarding the protection and betterment of the environment.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_





## Cyber Security and Information Security

Kelly is committed to safeguarding the integrity, availability, and confidentiality of our information and information Systems, as well as the information entrusted to Kelly by its customers, Workers, candidates, applicants, and Suppliers.

The following principles are required from our Suppliers:

- All Suppliers shall have a publicly available Privacy Statement that is consistent with Applicable Laws and Regulations regarding data privacy and information security.
- All personal data collected by Suppliers shall be processed and managed in accordance with their Privacy Statement.
- The Suppliers shall comply with their own obligations under the Applicable Laws and Regulations, including but not limited to the General Data Protection Regulation (GDPR) for companies processing the personal data of individuals located in the European Union (EU) or European Economic Area (EEA).
- Suppliers must adopt appropriate safeguards to protect and manage their information systems and data. For Supplier technology that accesses the Kelly network or applications, or that store or process our proprietary, confidential, or personal data, appropriate security measures that meet or exceed industry standards must be implemented (e.g., SSAE18, ISO27001, NIST CSF, or SP800-53).
- All confidential information stored, electronically or physically, will be appropriately secured (e.g., in locked cabinet, locked computers, encrypted, etc.), and securely destroyed upon expiry of any retention schedule required under the Applicable Laws and Regulations.
- Security policies must be documented, including incident response and notification procedures that comply with all Applicable Laws and Regulations.
- Appropriate training must be provided at least annually to ensure that your staff understand your security policies and their responsibilities for security and data privacy under the Applicable Laws and Regulations.

- Appropriate data protection and privacy terms must be agreed to by Suppliers where required by Kelly under Applicable Laws and Regulations, requiring the mutually appropriate use, disclosure, and protection of all confidential and personal data. Suppliers must extend all such data protection and privacy terms to their subcontractors.
- Where EU or EEA personal data may be transmitted to a non-EU/EEA country, such as the USA or the UK, contractual arrangements in compliance with Applicable Laws and Regulations must be implemented (e.g., the Kelly Supplier Data Protection Addendum (SDPA)). Suppliers must also extend these same terms to their subcontractors.

In the event that a security or privacy incident concerning Kelly personal, proprietary, and/or confidential information occurs with a Supplier or their subcontractor, the Supplier shall immediately contact Kelly Global Security at Mailbox Security at [KGS@kellyservices.com](mailto:KGS@kellyservices.com) or by calling Kelly Global Security and Investigations at +1.248.244.4250 to inform them of the incident. They shall keep Kelly informed of the status of such an incident through reasonable periodic updates and shall work collaboratively with Kelly to bring the incident to its resolution as required under the Applicable Laws and Regulations.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

### Documentation and Recording

Suppliers agree to maintain complete and accurate records, in accordance with Applicable Laws and Regulations, and as necessary to confirm compliance with its obligations to Kelly and/or our shared customers. Suppliers will maintain originals of such records for the legally required minimum period for each requirement and at least (3) years following any expiry of their agreement with Kelly.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

### Risk Assessment

Suppliers agree to develop an overall risk framework that helps the company manage and understand its risk exposure. Organizations should develop a risk framework that considers the company's risk appetite, risk tolerance, and risk capacity, and use this framework in their implementation and decision-making.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

### Assessments, Audits, and Corrective Plans

Kelly is committed to working only with Suppliers and partners who embrace the Kelly Supplier Code of Conduct and who demonstrate an interest in a strong partnership and continuous improvement. To that end, Suppliers agree to conduct internal assessments, at least annually.

In addition, Kelly reserves the right to monitor, investigate, and audit each Supplier's compliance with our Supplier Code of Conduct, subject to all Applicable Laws and Regulations. This may occur at agreed-upon timeframes, but may also occur on an as-needed basis, as determined by Kelly. We expect cooperation from Suppliers by providing relevant information that we request, and by making individuals accessible so Kelly can conduct a meaningful audit. Where an audit concerns Supplier's sensitive information, if required by Supplier, Kelly shall execute a reasonable nondisclosure agreement. Kelly may assign the audit to an independent third party, in which case such third party shall be held to nondisclosure terms that are at least as strict as the terms that Kelly have agreed to.

Finally, subject to Applicable Laws and Regulations, Suppliers will develop and implement a corrective or preventative action plan for the timely correction of any noncompliance or nonconformance identified by internal and external audits and assessments.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

# Guiding principles, standards, and procedures.

For each of the aforementioned Standards, Supplier shall follow the process outlined below:

**1. Operational Guiding Principles, Standards, and Procedures**

**1.1 Written Policy and Procedures**

Suppliers are required to have a written policy for each of the Supplier Code of Conduct “Standards” which comply with applicable laws and regulations, the Kelly Supplier Code of Conduct, and all other relevant local, state, national, country, or regional laws.

Please check the applicable box below regarding how your organization will comply with these Standards and Policies.

We have adopted the Kelly Supplier Code of Conduct Standards and have made them available to the individuals supporting Kelly and our third-party providers.

**1.2 Directly Responsible Individual(s)**

All Suppliers must identify the responsible individual(s) to oversee and enforce the implementation of the Kelly Supplier Code of Conduct Standards within their enterprise. Please list the individuals who support your business with Kelly in the space provided below, or provide an Excel file listing the name, title, position, and accounts or relationships supported along with the execution of this Supplier Code of Conduct.



| NAME | TITLE | POSITION | ACCOUNTS SUPPORTED | EMAIL ADDRESS | PHONE NUMBER |
|------|-------|----------|--------------------|---------------|--------------|
|      |       |          |                    |               |              |
|      |       |          |                    |               |              |
|      |       |          |                    |               |              |
|      |       |          |                    |               |              |

## 2. General Operational Approach

### 2.1 Risk Management

All Suppliers are required to identify and comply with all the Supplier Code of Conduct requirements specified in this document and all Applicable Laws and Regulations in relation to these Standards. Suppliers must identify, assess, minimize, and eliminate any practices not in alignment with these Standards, and report any incidents that may have occurred or occur in the future which are violations of these Standards.

#### Action:

Each year, we reaffirm this commitment through the acknowledgment of our Supplier Code of Conduct and the Standards.

It is each Supplier's responsibility to be familiar with (or take appropriate steps to become familiar with) Applicable Laws and Regulations that govern these Standards, and to ensure that their employees been properly informed or trained in relation to all these Standards.

Any suspected violation should be reported immediately to the Vice President of Internal Audit, General Counsel, or Kelly Law Department at Mailbox Employment Law ([employlaw@kellyservices.com](mailto:employlaw@kellyservices.com)) or +1 248.244.4555; or through the Kelly Business Conduct and Ethics Reporting Program at 877.978.0049 or <https://secure.ethicspoint.com/domain/media/en/gui/82243/index.html>

We have adopted the Kelly Supplier Code of Conduct Standards and have made them available to the individuals supporting Kelly and our third-party providers.

### 2.2 Non-compliance

The failure of the Supplier to comply with the Applicable Laws and Regulations or this Supplier Code of Conduct, including the Standards, will constitute grounds for corrective action, up to and including termination of our business relationship for cause.

Retaliation of any kind against any individual for reports made in good faith under this policy is expressly prohibited and will result in corrective action, up to and including termination of our business relationship for cause. If you suspect that you or someone else has been retaliated against for raising any non-compliance issue related to this Supplier Code of Conduct, immediately contact the Kelly Business Conduct & Ethics Reporting Program at 877.978.0049 or <https://secure.ethicspoint.com/domain/media/en/gui/82243/index.html>.

### 3. Training and Messaging

All Suppliers agree to provide comprehensive training on these Standards to anyone who is directly or indirectly engaged in rendering Services, goods, or other business activities connected to Kelly or our shared customer(s).

#### Action:

Supplier agrees to effectively communicate this Supplier Code of Conduct, including each of the Standards, to all Workers, supervisors, and other staff, including agents or representatives, who support Kelly or our shared customers. This communication shall include information about risk management and non-compliance procedures as well as practical examples to assist in applying this policy to situations individuals may encounter in the course of their professional work on behalf of Kelly. The above communication of this policy shall be provided and reinforced with all relevant personnel, at least on an annual basis.



# Incident management.

Suppliers will strive to ensure a safe, secure workplace and working conditions that promote health and well-being for all their employees. We are each responsible for paying close attention to our surroundings, following all safety rules and procedures including Applicable Laws and Regulations, and reporting any unsafe conditions or work-related injury or illness.

All Suppliers are required to ensure the proper management of personal- and business-related data, which should be handled in accordance with the all-relevant confidentiality and data privacy obligations within the Applicable Laws and Regulations and/or contracts with Kelly or our customers. Supplier shall ensure that they do not, through action or inaction, cause Kelly to be in breach of its Privacy Policy or Applicable Laws and Regulations with respect to personal or business data.

It is the Supplier's responsibility to establish a process that allows workers to report any violations or possible violations of this Supplier Code of Conduct to one of their representatives without fear of repercussions. When in doubt about the best course of action in a specific situation, individual Workers should be able to talk to their manager, human resources representative, legal department representative, and/or other appropriate personnel.

If a violation or possible violation of this Supplier Code of Conduct is reported or otherwise discovered, the Supplier will conduct a prompt, thorough, consistent, and unbiased investigation of the incident. All such incidents will be followed through to their resolution. Proper documentation of all facts obtained during the investigation, as well as the resolution of the issue, will be retained in a secured physical or electronic location with restricted accessibility. If the incident cannot be rectified immediately, the incident should be escalated to Kelly Global

Security at Mailbox Security ([KGS@kellyservices.com](mailto:KGS@kellyservices.com)) or by calling Kelly Global Security and Investigations at +1.248.244.4250 to inform them of the incident. Once reported, Supplier shall keep Kelly informed of the status of the incident through reasonable periodic updates and shall work collaboratively with Kelly to bring the incident to its resolution. Kelly reserves the right to audit any documentation retained by our Suppliers pertaining to such an incident.

INITIAL HERE TO ACKNOWLEDGE & ACCEPT \_\_\_\_\_

By executing this Supplier Code of Conduct and each Standard, you are acknowledging and accepting that you will act in accordance with the Supplier Code of Conduct. While your signature is required, it's your commitment to doing the right thing and conducting business to the highest standards that ensures our success and continued differentiation.

SIGNATURE

\_\_\_\_\_  
Add Supplier's signature

NAME

\_\_\_\_\_  
Add the name of Supplier's signer

TITLE

\_\_\_\_\_  
Add the job title/role of Supplier's signer

DATE

\_\_\_\_\_  
Add the date of the signature

## Appendix.

### Definitions and glossary.

**Applicable Laws and Regulations** – all legally binding laws, rules, regulations, and procedures, directives, orders, decisions, and official guidance applicable to the Supplier's operations and its employment or engagement and management of Workers.

**Network** – collectively refers to all Suppliers that do business with Kelly or our customers or who are otherwise encompassed by Kelly managed supply chains.

**Standard** – a summary description of the level of quality, compliance, ethics, or achievement expected from our Suppliers on a specific topic.

**Supplier** – any company that provides services, goods, or commodities to Kelly or one of our customers or otherwise collaborates with Kelly for business purposes, including without limitation service providers, staffing agencies, vendors, and partners engaging in services that may include staffing, consulting, outsourced functions, production, data analytics, project services, goods, commodities, software development, marketing, event planning, joint business development, intelligence sharing, and more. The term "Supplier" includes such Supplier's parent companies, subsidiaries, subcontractors, agents, representatives, partners, and/or affiliates to the extent that these are involved with the provision of services, goods, commodities, or similar to our customers.

**Worker** – any natural person, regardless of nationality or country of origin, who is employed or otherwise engaged by Supplier or Supplier's subcontractor to perform work for the direct or indirect benefit of Supplier, Kelly, or our customers.

**Workplace** – any location where Workers conduct work or are otherwise present for work-related purposes.

### Change History

June 2021 – Initial document authored

