



WHISTLEBLOWER POLICY

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Purpose and Commitment

Kelly Services, Inc. and its subsidiaries ("Kelly" or "the Company") maintains a global commitment to the principles of integrity, accountability, and legal compliance across every jurisdiction in which it delivers staffing, outsourcing, and workforce consulting solutions. As a company that connects talent with employers across highly regulated industries — including life sciences, education, technology, and professional services — Kelly's operational activities regularly traverse complex legal and ethical landscapes. These activities involve not only direct employment relationships, but also the engagement of independent contractors, subcontractors, managed service providers, and cross-border, third-party partners.

Policy

To support and reinforce its commitment to lawful and ethical conduct across these interconnected business operations, the Company has adopted this Global Whistleblower Policy ("Policy") to ensure individuals — whether employees, independent contractors, former staff, suppliers, or any third party affiliated with the Company's service delivery — can report concerns about potential misconduct in a secure and protected manner. This Policy establishes a mechanism for confidential disclosures, outlines safeguards for those who raise concerns in good faith, and sets forth Kelly's obligations under applicable international, regional, and domestic legal frameworks. It also affirms that protection against retaliation, access to secure reporting channels, and procedural fairness in follow-up investigations are not merely administrative goals but represent critical pillars in maintaining a compliant, transparent, and ethically grounded global enterprise.

The underlying objective of this Policy is to blend various legal standards across Kelly's global footprint and to ensure that, regardless of location or function, individuals have a consistent and reliable means of raising concerns. While jurisdictions such as the United States, the United Kingdom, and the Member States of the European Union each impose specific allowable obligations regarding whistleblower protection, Kelly views these not as limitations to be navigated, but as foundational expectations to be fully embraced. Accordingly, this Policy incorporates key requirements from Section 806 of the Sarbanes-Oxley Act of 2002, Section 922 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, the United Kingdom's Public Interest Disclosure Act 1998, Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law ("EU Whistleblower Directive"), and Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR"). Where the protections conferred by national law exceed those articulated in this Policy, Kelly will apply the higher standard to ensure that whistleblowers are never disadvantaged by jurisdictional location.

This Policy applies across all Kelly entities worldwide and extends to all individuals with a significant relationship to the Company, including temporary agency workers, secondees, trainees, and consultants. The Company affirms that **any individual who reports a matter in good faith—whether or not the report is ultimately substantiated—will be protected from retaliation and from any form of disadvantageous treatment** as a result of having raised a concern. Furthermore, the Company recognizes that the success of any whistleblower framework depends not only on the existence of formal procedures but on the underlying culture in which those procedures operate. Kelly is committed to ensuring that employees and third parties alike feel confident that their concerns will be heard, taken seriously, and addressed objectively, free from bias, fear, or reprisal. It is because of these checks and balances we have confidence in our process as defined above.

Scope of Reportable Concerns

This Policy applies to the reporting of any conduct that a reasonable person would believe constitutes a violation of applicable law, regulation, or internal policy, or that otherwise undermines the Company's core values of integrity, fairness, and accountability. Misconduct may occur at any level of the organization and may involve employees, managers, officers, or third parties acting on behalf of the Company. While not exhaustive, examples of reportable matters include acts of **fraud, bribery, corruption, theft, undisclosed conflicts of interest, harassment or discrimination, breaches of occupational safety obligations, unauthorized disclosures of confidential information, environmental harm, human rights violations, anti-competitive practices**, and **violations of applicable trade, labor, or privacy laws**. The Company also encourages the reporting of organizational failures in internal controls or compliance frameworks, even where no individual wrongdoing is suspected. In each case, the central inquiry is whether the conduct, if proven, would undermine Kelly's legal obligations, ethical standards, or operational integrity. Concerns may relate to conduct that has occurred in the past, is currently occurring, or is reasonably anticipated to occur in the future. Early reporting of potential risks is encouraged to help prevent harm and ensure timely intervention.

Although this Policy is global in scope, it expressly incorporates the types of wrongdoing identified in the EU Whistleblower Directive, which extends protection to individuals who report breaches of Union law in areas including but not limited to public procurement, financial services, money laundering prevention, environmental protection, consumer safety, and data privacy. Reports under this Policy may concern acts or omissions that occurred in a single jurisdiction or that implicate cross-border operations. Given Kelly's international structure, it is recognized that misconduct in one country may involve reporting parties, implicated actors, and investigative bodies located in multiple legal systems. This Policy ensures that such reports are not excluded simply because they span jurisdictional boundaries.

Importantly, Kelly does not require whistleblowers to provide undeniable proof of wrongdoing at the time of their report. What is required is that the report be made in **good faith**, meaning that the reporting individual genuinely believes that the concern raised is based on accurate information or a reasonable suspicion of misconduct. The Company will not take action against individuals whose reports turn out to be unfounded, provided that they acted honestly and without malicious intent. However, individuals who intentionally make false or misleading allegations may be subject to disciplinary action under internal policy and, in certain jurisdictions, may also face civil or criminal penalties. This standard ensures that the whistleblower system is safeguarded from abuse while maintaining a presumption of integrity toward those who participate in good faith.

Protection Against Retaliation

Kelly unequivocally prohibits any form of retaliation against individuals who raise concerns under this Policy, assist in an investigation, or otherwise engage in protected whistleblowing activity (reporting, questioning, informing leads, etc.). Retaliation is broadly defined and includes dismissal, suspension, demotion, department transfer, transfer to an unfavorable position, reduction in pay or benefits, intimidation, social or professional isolation, threats, or any other conduct that would deter a reasonable person from raising a concern. The Company applies a zero-tolerance approach to retaliatory behavior, and allegations of such conduct will be treated as standalone violations of this Policy, subject to their own internal investigation and corrective action, if warranted.

The anti-retaliation protections contained in this document and policy are grounded in allowable provisions such as Section 806 of the Sarbanes-Oxley Act of 2002 and the Public Interest Disclosure Act 1998, which prohibit adverse employment actions in response to whistleblowing. In the European Union, Directive (EU) 2019/1937 requires Member States to adopt robust enforcement mechanisms to penalize retaliatory conduct and to ensure full reinstatement and financial compensation for those affected. Kelly will honor these obligations in full and will offer remedial measures where necessary, including but not limited to the reversal of adverse personnel actions, reassignment, payment of lost wages, and public reaffirmation of the whistleblower's integrity.

Individuals who believe they have been subjected to retaliation are encouraged to report such incidents. Retaliation complaints will be prioritized and handled independently of the initial matter, and investigations will be conducted by personnel with no involvement in the alleged retaliatory behavior. The Company will seek to provide temporary protections during the period of a retaliation investigation, including short-term changes to reporting lines, work locations, or job responsibilities, if such measures are reasonably necessary to prevent

further harm. Where applicable, these protections extend not only to current employees but also to former employees, job applicants, and other individuals whose relationship with the Company has concluded or has not yet begun. Kelly recognizes that retaliation can occur before, during, or after a formal engagement, and will ensure that all covered individuals are safeguarded from adverse treatment as a result of making or supporting a report in good faith.

Confidentiality and Data Protection

Kelly acknowledges that the success of any whistleblower framework is contingent on the confidentiality and security of the information disclosed. The Company therefore undertakes to preserve the confidentiality of all whistleblower reports, including the identity of the reporting party and any witnesses or implicated individuals, to the fullest extent permitted by law. Disclosure of a whistleblower's identity will only be made when strictly necessary for investigative or legal purposes and, where possible, only with the individual's prior consent. In the absence of legal obligation, the Company will neither reveal the identity of the reporting party nor take steps to determine the identity of anonymous reporters. Furthermore, the Company recognizes that individuals named in whistleblower reports have data subject rights under data protection laws, such as the right to access or rectify personal data. These rights may be restricted where necessary to safeguard the whistleblower's identity, maintain the integrity of the investigation, or comply with exemptions under applicable law.

In recognition of its obligations under data protection laws, including Regulation (EU) 2016/679 ("GDPR"), Kelly affirms that all data collected or processed in connection with a whistleblower report constitutes personal data and will be handled in accordance with the core principles of lawfulness, fairness, transparency, purpose limitation, data minimization, and storage limitation. Personal data collected through whistleblower mechanisms will be strictly limited to information that is relevant, proportionate, and necessary to evaluate the report and conduct a fair investigation. The Company relies on appropriate legal bases for processing personal data, including legitimate interests and legal obligations, in accordance with applicable data protection laws. Where sensitive data (such as health or ethnicity) or data relating to criminal offences is processed, the Company ensures compliance with relevant legal requirements and safeguards under applicable national or regional data protection frameworks. The Company will not retain personal data beyond the period necessary to fulfill these objectives, and all data will be securely stored, encrypted where appropriate, and protected from unauthorized access. Where necessary, individuals whose personal data is processed in relation to a whistleblower report, including either the whistleblower or the subject of an investigation, will receive appropriate privacy information through the Company's general privacy notice, available at www.kellyservices.com/en/policies/privacy-statement/.

In cases involving cross-border investigations — particularly those spanning the United States, European Union, and United Kingdom — the Company will implement additional safeguards to ensure that personal data is not unlawfully transferred outside the originating jurisdiction. These safeguards may include the use of standard contractual clauses approved by the European Commission, transfer risk assessments, pseudonymization techniques, or, where necessary, obtaining the explicit consent of the data subject. Kelly will also ensure that any external third parties engaged to assist with investigations are contractually bound to adhere to these standards and will not use the data for any purpose beyond the scope of their engagement. The Company reaffirms that **no aspect of the whistleblower program may override the fundamental data rights of individuals under applicable law**, and it is committed to ensuring that the values of privacy and ethical responsibility remain inseparable.

Investigative Process

Upon receipt of a whistleblower report, the Law, Risk, and Compliance Department shall conduct an initial assessment to determine whether the matter warrants a formal investigation. This review includes an evaluation of the credibility, completeness, and materiality of the report, as well as the nature of the allegations, the individuals implicated, and any legal or reputational risks posed. If a report raises concerns of sufficient seriousness, the Company will promptly initiate an investigation conducted by qualified personnel with the required independence, subject-matter expertise, and societal competence to handle sensitive matters impartially. Where necessary, external counsel or third-party investigators may be retained to ensure procedural fairness, avoid conflicts of interest, and promote public or stakeholder confidence in the outcome.

The scope and duration of the investigation will be determined on a case-by-case basis. The process will be handled with care and fairness with adequate consideration of the nature of the allegations. Investigators will collect relevant documentation, analyze internal records, conduct interviews, and evaluate physical or electronic evidence as necessary to arrive at a balanced and well-reasoned conclusion. Individuals named in the report will be given an opportunity to respond to the allegations, and all interviews will be conducted with respect for dignity, privacy, and the presumption of innocence. The Company is committed to ensuring that both whistleblowers and subjects of investigation are treated fairly and without prejudice throughout the process.

At the conclusion of the investigation, the findings will be summarized in a report that will be reviewed by senior management and, when warranted, the Audit Committee of the Board of Directors. The Company will take timely and appropriate corrective or disciplinary action based on the results, proportional to the nature and severity of the misconduct. Actions may include termination of employment or business relationships, process changes, regulatory notification, or legal proceedings. In cases where systemic issues are identified, the Company will implement organizational learning measures such as internal policy reform, strengthened controls, and enhanced training. Whistleblowers who disclosed their identity will be notified of the resolution to the extent permitted by law and Company policy.

Reporting Channels

Reports of misconduct under this Policy may be submitted to a manager, supervisor, human resources professional, or compliance officer. Additionally, Kelly maintains a global, independently administered whistleblower hotline and web-based reporting portal, which allows individuals to submit reports confidentially or anonymously (where permitted by local law). These tools are accessible 24 hours a day, 7 days a week, in multiple languages, and are designed to accommodate the full range of operational geographies and risk profiles across the organization. Individuals may access the web-based portal, Ethics Point, at www.integrity-helpline.com/kellyservices.jsp or call the global whistleblower hotline at **+1 877-978-0049** for confidential reporting from any international location.

The Company encourages individuals to include as much factual detail as possible in their reports to facilitate a thorough and efficient investigation. Reports should describe the nature of the concern, identify any persons involved, indicate relevant dates or timeframes, and attach supporting documentation if available. While Kelly accepts anonymous reports, it acknowledges that the ability to fully investigate may be constrained by a lack of verifiable detail or follow-up opportunities. Nevertheless, the Company will make all reasonable efforts to assess and act upon anonymous submissions to the extent feasible and lawful.

Anonymous reporting is permitted under this Policy and is fully supported through the Company's designated reporting systems. However, Kelly recognizes that the legality and ability to investigate anonymous reports can differ based on local laws. In jurisdictions such as the United States, United Kingdom, Ireland, and the Netherlands, anonymous reporting is broadly permitted without material restriction. In contrast, other countries — including France, Germany, and Portugal — impose additional conditions under national law or data protection frameworks. For instance, earlier guidance in France restricted the acceptance of anonymous reports to serious matters that could be independently verified. Under the current legal framework implementing Directive (EU) 2019/1937, organizations are no longer prohibited from accepting anonymous reports but are also not required to process them unless adequate detail is provided to support a credible inquiry.

In light of these differences, Kelly assesses anonymous reports on a jurisdiction-specific basis and endeavors to pursue investigations where the facts presented are credible, verifiable, and material to the Company's compliance obligations. Where anonymous reporting is utilized, Kelly will apply enhanced confidentiality safeguards to protect the integrity of the process and — if the reporter's identity later becomes known — the individual's privacy and protection under applicable law. Individuals submitting reports, whether named or anonymous, are encouraged to utilize the secure follow-up mechanisms embedded in the Company's third-party reporting platform, which allows for ongoing communication without disclosure of identity.

In line with Kelly's commitment to transparency and accessibility, information about reporting channels is disseminated through the Code of Business Conduct and Ethics, onboarding materials, compliance training, and internal communications. Posters, intranet notices, and employee handbooks reinforce the visibility of available reporting mechanisms. Kelly's leadership is expected to actively promote a culture in which reporting suspected

misconduct is understood as both a professional obligation and a core element of responsible corporate citizenship.

In addition to the internal reporting mechanisms described above, Kelly recognizes and respects the right of individuals to make disclosures directly to governmental, regulatory, or oversight authorities, including law enforcement, anti-corruption bodies, financial regulators, labor and employment authorities, or data protection agencies, where such reporting is permitted or protected by applicable law. Nothing in this Policy is intended to discourage or limit such external reporting. Individuals may choose to report directly to the appropriate external authority in accordance with national legislation, including but not limited to the EU Whistleblower Directive (Directive 2019/1937), the UK Public Interest Disclosure Act 1998, the South African Protected Disclosures Act, and other relevant statutory frameworks in the various jurisdictions where Kelly operates.

Documentation and Oversight

Kelly maintains detailed and secure records of all reports received under this Policy, regardless of the reporting channel or whether the report results in an investigation. These records include the content and source of the report (where known), the date of receipt, the persons assigned to review or investigate the matter, any investigative steps taken, findings or conclusions reached, and corrective actions implemented. Documentation is maintained in a secure case management system with access restricted to authorized personnel, and audit trails are preserved to ensure integrity and accountability.

Retention of whistleblower records will comply with applicable legal and regulatory requirements, including those under the GDPR and similar national data protection laws. In general, records will be retained only as long as necessary to fulfill the legitimate compliance and investigative functions of the Company or to satisfy statutory or contractual obligations. At the conclusion of the retention period, records will be securely deleted or anonymized in accordance with data protection best practices.

Oversight of the whistleblower program lies with Kelly's Law, Risk, and Compliance Department and the Board of Directors. These bodies receive periodic, aggregated reports summarizing key metrics such as the number of reports received, categories of allegations, substantiation rates, and remediation outcomes. This oversight promotes transparency, reinforces independence, and provides the basis for continuous improvement of Kelly's compliance and ethics infrastructure. In addition, the Company monitors the effectiveness of its whistleblower procedures through regular analysis of data trends, review of response times, and evaluation of remedial actions taken. Anonymized outcome metrics may be used to identify patterns of risk, assess policy implementation, and inform compliance training. This process ensures that Kelly not only responds to misconduct but also adapts its policies and practices to prevent recurrence and strengthen organizational integrity.

Training and Awareness

Kelly recognizes that the effectiveness of its whistleblower program is closely linked to the awareness and confidence of its workforce and partners. Accordingly, the Company integrates whistleblower education into its global compliance training programs, new hire orientations, and periodic reinforcement campaigns. These training initiatives are tailored by jurisdiction and job function to ensure that employees understand their reporting rights and obligations, the protections afforded under law and policy, and the mechanics of submitting a report safely and confidentially.

In jurisdictions with heightened sensitivity around whistleblowing or cultural barriers to speaking up, Kelly undertakes localized communication and support strategies, including region-specific messaging, translated materials, and engagement by trusted compliance liaisons. Senior leaders and people managers receive additional training on how to respond to disclosures, protect whistleblower confidentiality, and uphold non-retaliation obligations in practice.

Awareness of the program is also reinforced through visual communications, such as posters, digital signage, and announcements on Company platforms. Kelly regularly evaluates the effectiveness of its awareness and training initiatives through surveys, audits, and incident trend analysis, ensuring the whistleblower program evolves in step with legal developments and organizational need.

Conclusion

This Global Whistleblower Policy affirms Kelly's unwavering commitment to ethical conduct, legal compliance, and institutional transparency. Whistleblowers are often the first line of defense in identifying risks that may compromise the Company's values or violate the law. By fostering a culture in which concerns are welcomed, addressed responsibly, and protected from reprisal, Kelly advances not only its legal obligations but its broader mission to be a responsible and principled global employer. The Company encourages all individuals to report concerns in good faith, and pledges that each report will be treated with seriousness, discretion, and procedural rigor, in accordance with the highest standards of modern corporate governance.

In the event of any inconsistency or conflict between this Policy and the applicable laws or regulations of a particular jurisdiction in which Kelly operates, the Company will comply with the higher standard of protection afforded to whistleblowers under local law. This approach ensures that individuals are never disadvantaged by jurisdictional discrepancies and reinforces the Company's commitment to maintaining a whistleblower framework that not only meets but exceeds global legal expectations. Kelly will continue to monitor legal developments across all jurisdictions to ensure that this Policy remains aligned with evolving statutory requirements and best practices.