

Kelly Group, Inc. Code of Business Ethics and Conduct

Kelly Group, Inc. dba Kelly Klosure Systems is committed to creating value for our clients through innovative building and enclosure solutions. Honest, fair and ethical business practices are woven into our culture and form the foundation for our success.

Honest, ethical behavior is the standard that we expect from our directors, officers, other executives, employees and business partners including companies in our supply chain. This Code of Business Ethics and Conduct sets forth the standards that guide our every action at Kelly Klosure.

We expect each Kelly Klosure employee and business partners including companies in our supply chain to meet the standards provided in this Code. We will not tolerate behavior that does not meet this standard. Any employee violating these standards will be subject to disciplinary action by the company up to and including termination.

Please take a moment to review these guidelines. We offer them as a resource to guide our day to day decisions and actions at work.

A Culture of Ethical Business Practices and Personal Integrity

Kelly Klosure Systems is a company that stresses both corporate and personal integrity. We not only comply with laws and applicable regulations; but we also strive to conduct our affairs according to the highest ethical standards. Adherence to such standards should never be traded in favor of financial or other business objectives. If an employee is involved in proposals, bid preparation or contract negotiations, he or she must be certain that all statements, communications, certifications and representations to prospective customers are accurate and truthful.

Kelly Klosure employees are expected to be honest and forthright in dealings with managers, subordinates and with one another as well as with clients, suppliers, government agencies and their employees, business partners and the general public. Kelly Klosure employees must maintain the highest level of personal integrity and encourage it in others.

Quality Work and Customer Satisfaction

Over the years Kelly Klosure has earned a reputation for the highest level of excellence. An emphasis on quality permeates everything we do. We strive to do the

best possible job in all our work; to be as efficient as possible; and to work diligently to avoid mishaps, correcting them promptly should they occur. We will not tolerate substandard performance in products or service.

Eighty percent of Kelly Klosure's business comes from repeat customers. We work hard to make sure our customers are completely satisfied with our product and service. If there is a problem, we are committed to its prompt resolution.

Kelly Klosure's Responsibilities to Employees

People are the most important resource at Kelly Klosure. In support of our employee's we are committed to...

- Promote a culture in which each employee knows he or she is valued and respected.
- Recruit the best available people with high personal integrity, intelligence, a strong work ethic, a positive attitude and substantive expertise without discrimination. Our company hires only those individuals who are authorized to work in the United States through the use of E Verify and complies with the Immigration Reform and Control Act of 1986 and subsequent relevant legislation, including the U.S.A. Patriot Act.
- Running our business in a way that rewards people for their performance, regardless of their background. Kelly Klosure cares about its people and we expect Kelly Klosure people to care about one another and the company.
- Treating every person with dignity and respect, regardless of his or her position. We will not tolerate harassment of any kind. Kelly Klosure emphasizes working together to achieve corporate goals.
- Encouraging supervisors and individual employees to have open communications and to be receptive to dissenting opinions. Kelly Klosure employees are encouraged to be courteous, friendly and helpful.
- Providing a safe and clean work environment that complies with all relevant laws and regulations, including those related to substance abuse.

Employee Responsibilities to Kelly Klosure

Kelly Klosure Employees are expected to...

- Conduct Business in Accordance with High Ethical Standards as provided in this Code of Business Ethic's and Conduct, relevant laws and regulations and all company policies in working with our customers, suppliers, financial partners and all other business contacts.

- Treat all Employees with Dignity and Respect, without discrimination
- Avoid Conflicts of Interest. When making decisions and acting for Kelly Klosure, employees are expected to do so fairly, objectively and free from outside influence. Employees should not offer their skills or services to competitors or potential competitors, or engage in outside businesses that compete with or sell goods or services that are competitive to Kelly Klosure.
- Protect Company Proprietary information. Safeguard the Company's Technology and Intellectual Property from loss and/or negligent disclosure.
- Protect Company Records – Documents and other records must be retained in accordance with the requirements of the law, government contracts and company policies. Kelly Klosure corporate records and documents shall not be removed from company premises or used for personal gain or benefit.
- Never engage in bribery, “kick-backs”, price fixing, collusion, or any related practice that might be or give the appearance of being-illegal or unethical
- Report any cases of actual or suspected non-compliance with this Code of Conduct using the channels provided herein. Every employee has a duty to report suspected non-compliance with applicable rules and regulations to their manager, the director of compliance, the director of human resources, or another member of the executive management team. A Helpline at phone (402)727-4919 for anonymous reports is available 24 hours a day, seven days a week. Reports may also be submitted via email at report@kellyklosure.com . Such reports will be investigated promptly, with due respect for the rights and privacy of all who may be involved in such an investigation. There will be no retaliation or penalty against an employee who raises a concern in good faith. Feedback will be provided to employees who raise issues or concerns.

Financial Integrity:

We will maintain honest, accurate, timely and sufficient records of our assets, liabilities and operations.

Company books and records will be kept in accordance with generally accepted accounting principles, government regulatory requirements, and established finance and accounting policies. All reports submitted to government authorities will be made accurately, timely and in compliance with all applicable laws and regulations. All employees must cooperate fully with internal and external auditors during their examinations of company books, records and operations. Documents and other records must be retained in accordance with the requirements of the law, governing contracts and company policies.

We will ensure that no unlawful, improper, or questionable payments are made to third parties.

Dealing with Government Agencies:

Interactions with government agencies will be conducted with integrity and in accordance with all applicable laws and regulations as well as the company values stated herein. Employees are expected to pay special attention to comply with the many laws, regulations and clauses in our government contracts.

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