

## Summary / background

The Modern Slavery Act 2015 was introduced to address instances of slavery and trafficking in the UK. The legislation significantly enhances law enforcement powers and the level of support and protection for victims.

Modern slavery is a crime and a violation of an individual's human rights. It takes various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another person in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls designed to ensure modern slavery is not taking place anywhere within our business operations.

## What is the requirement?

All Kier employees and members that comprise Kier's supply chain (including subcontractors, materials suppliers, and other third parties providing services to Kier) are required to follow the systems and controls that are designed to ensure that modern slavery has no place in our business operations. Where our standards fall short of our expectations or where you have a concern, you must report those concerns.

To enable Kier to meet its commitment to ensuring modern slavery does not take place on our sites, you are required to understand the forms of modern slavery and the indicators of modern slavery.

## Why is it important?

The impact of modern slavery can be severe for the victims of this crime. As a responsible business Kier is committed to ensuring that it has systems and controls in place to prevent modern slavery from taking place in our business operations. The way we operate our business is set out in our Code of Conduct – this is underpinned by the principle of doing the right thing. Modern slavery is a criminal offence and can carry a prison sentence of up to life imprisonment.

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## What must I do/not do?

In applying this policy, we must consider our own actions and behaviours as well to remain vigilant to that of our colleagues and those working within our supply chain.

### We will:

- familiarise and comply with this policy;
- remain alert to any possible instances of modern slavery across our business or supply chain;
- only employ individuals who enter into employment with us freely and voluntarily, without the threat of penalty and where employees have the freedom of association (for instance, to join a trade union) and to terminate employment under specified notice;
- not tolerate any fees or costs incurred by workers in the recruitment process to secure employment;
- communicate our commitment to mitigating the risk of modern slavery and share this policy to our supply chain at the outset of our business relationship with them and at appropriate intervals thereafter;
- ensure we follow our procurement standards;
- carry out appropriate due diligence;
- request that our sub-contractors and suppliers complete a modern slavery assessment (for example, the government-administered Modern Slavery Assessment Tool);
- ensure that all our employees and eligible to work in the UK and check 'Right to work' documents where we are responsible for it;
- ensure our employees are paid at least the Real Living Wage in accordance with our Real Living Wage policy;
- Only employ persons over working age (for Kier purposes 16 years old) and under control measures applicable to our industry. We will not employ children below the minimum school leaving age;
- provide training as appropriate; and

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- report any known breaches or suspicions of a breach of this policy to Group Compliance who will initiate remedial action.

## **Modern Slavery Indicators**

There are a number of indicators that might point to potential modern slavery. Look out for signs where they:

- Appear to be under the control of others
- Tend not to interact with other people
- Don't have access to their own passport
- Wear the same clothes every day
- Appear frightened or hesitant
- Have signs of psychological or physical abuse (i.e. injuries)
- Look malnourished
- Living in inadequate accommodation (accommodation may be dirty or overcrowded)
- Dropped off/picked up in a vehicle at the same time, sometimes where multiple workers are transported

## **Our supply chain**

Our supply chain partners must hold their own suppliers to the same high standards. If the standards that we expect are not met, we may review the business relationship and require remedial action. If you know or suspect modern slavery in any of our supply chain, you must not relinquish responsibility for reporting the matter to that particular partner – all instances of potential modern slavery must be reported to Group Compliance.

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## **Raising a concern**

It is important that concerns are raised in a timely manner. To raise a concern contact:

- Group Compliance: [compliance@kier.co.uk](mailto:compliance@kier.co.uk)
- Our independent Speak Up provider on a confidential basis
- Call 0800 915 1571;
- Email [Kier@safecall.co.uk](mailto:Kier@safecall.co.uk); or
- File an online report at [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

For and on behalf of Kier Group plc

**Stuart Togwell, Chief Executive**

November 2025

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