

Background

Kier's purpose is to sustainably deliver infrastructure that is vital to the UK. We are a leading provider of infrastructure services, construction, and property developments. We are committed to delivering for communities and leaving lasting legacies through our work. Our purpose depends on maintaining its reputation for conducting business to the highest ethical standards. In turn, our employees must act in accordance with our Code of Conduct and Kier's values – collaborative, trusted and focused.

Our policies are designed to provide the minimum standards of conduct and behaviour that we set for ourselves and is aligned with our company values. Please ensure that you read each of these policies and, if you have any questions, please ask either your line manager or the Corporate Compliance department.

Who do our policies apply to?

Our policies apply to everyone working on behalf of Kier – employees and temporary staff wherever based. They also apply to business partners who supply services to Kier, including agents and intermediaries. In certain cases, we may also require third parties with which we work, such as joint venture partners, to comply with our policies. Our policies are also applicable to our sub-contractors and consultants. We only want to do business with those who have similar standards and values as us.

What are the consequences if I do not comply with a policy?

Everyone working on our behalf should be aware that any infringement of the policies, or the procedures or guidelines referred to in any of them, will be viewed seriously. We reserve the right to take disciplinary or other action, as appropriate, in the event of non-compliance. In some cases, non-compliance may mean that a criminal offence has been committed by Kier and/or by an individual. In such cases, we may report infringements to the relevant authorities, including the police. Where non-Kier parties acting on our behalf are not compliant with our policies, we would review our relationship with you and take appropriate action.

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Non-compliance may cause significant reputational damage to Kier. In addition, we may also face significant fines; loss of contracts; and exclusion from future public tenders.

Who can I contact with any questions?

If you have a question about any of our policies, please either speak to your line manager or contact the Corporate Compliance team: compliance@kier.co.uk

How do I speak up?

Some concerns can be addressed by speaking to the person whose conduct is the cause for concern. We understand that this is not always possible; if it is not, please speak to your line manager. If, for whatever reason, you do not feel comfortable doing this or it is inappropriate, you can contact any member of the Corporate Compliance department. Alternatively, you may prefer to use the Speak-Up helpline, which is run by an independent, external company (Safecall). Reports can be made confidentially and anonymously if you prefer.

Speaking up can be a difficult thing to do, so please be assured that all information received will be treated seriously and investigated appropriately. If you act in good faith, believing your information is accurate, we will protect you even if you are mistaken.

Safecall:

Telephone numbers to call:

- If you are calling from the UK the number is 0800 915 1571
- If you are calling from the UAE the number is 8000 441 3376
- If you are calling from Saudi Arabia the number is 800 844 2067.

The line is available 24 hours a day. Calls are free of charge and can be made in complete confidence.

You can also make a report via the website: www.safecall.co.uk/file-a-report/ or email kier@safecall.co.uk.

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For and on behalf of Kier Group plc

Stuart Togwell, Chief Executive

November 2025

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