

Kier Group plc

Modern Slavery Act 2015 Statement

December 2018

Introduction

Kier is a leading infrastructure services, buildings and developments & housing group. We operate across a range of sectors, including defence, education, health, housing, power, transport and utilities. A full description of the business and services we offer can be found in our Annual Report and Accounts at <https://www.kier.co.uk/media/2408/kier-annual-report-2018.pdf>

. We have relationships with a large number of sub-contractors and, every day, a significant number of their employees will be working on our sites, in addition to our own employees. We also rely on a number of manufacturers, suppliers and distributors which, in turn, will source products from their respective supply chains.

Our policies

We have a number of policies that are designed to manage the risks relating to modern slavery and human trafficking issues, including our Employee Code of Conduct, Responsible Procurement Policy and Anti-slavery and Human Trafficking Policy. These set out our position of zero tolerance of modern slavery and human trafficking in any form in our business and supply chain. We are committed to acting ethically and with integrity in our business dealings and relationships and to maintaining systems and controls designed to ensure modern slavery and human trafficking are not taking place in our business or across our supply chain. Our Whistleblowing Policy provides a mechanism for our employees and others working in our supply chain to report suspected breaches of these policies.

We are aware that risks arising from modern slavery and human trafficking can apply anywhere in our operations, whether through direct employment, sub-contracted employees or the supply of materials. We expect our suppliers and subcontractors to ensure that there is no slavery or human trafficking in their supply chain. Where issues are identified (including through our audit process) that are not resolved to our satisfaction, we review the on-going nature of the relationship with that relevant organisation.

Our approach to assessing and managing risk

1. We have a Group-wide policy confirming our zero tolerance of modern slavery and human trafficking.
2. Our policies require that our sub-contractors and suppliers acknowledge their responsibility for adhering to our policies.
3. We have undertaken risk assessments to identify the key risks in our supply chain and review those risk assessments regularly.
4. We have issued minimum procurement standards for certain, high risk categories of materials and products. We keep these standards under review.
5. Our contractual terms include obligations on our sub-contractors and suppliers to comply with our policies, including our Anti-slavery and Human Trafficking Policy.
6. Our policies require our subcontractors and suppliers to complete an assessment to confirm that they comply with Kier's zero tolerance policy. During the year, we have worked with three accreditation companies in the UK (Chas, Constructionline and Achilles Building Confidence) to develop a set of common standards applicable to our sub-contractors and suppliers.
7. We undertake checks on new recruits to ensure that they are eligible to work in the relevant country of employment.
8. We continue to deliver training to key employees on the risks of modern slavery and human trafficking and our processes to mitigate these.
9. We continue to monitor the effectiveness of our actions against the risk of modern slavery and human trafficking. This includes reviewing our policies and our procurement standards and implementing an audit programme (see below).
10. We undertake audits of certain key supply chain partners to understand and validate the controls in their organisations and provide an opportunity to learn from best practice.
11. We have supported the development and launch of industry-wide training on modern slavery that is available through the Supply Chain Sustainability School.
12. We are signatories to the Gangmasters & Labour Abuse Authority (GLAA) construction protocol. We are working with the GLAA and others to drive awareness of modern slavery issues and best practice in the construction sector.

Next steps

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking.

Next steps will include:

1. Continuing to develop further standards to support our Anti-slavery and Human Trafficking Policy (and related policies).
2. Keeping our pre-qualification standards for the appointment of new suppliers and subcontractors under review.
3. Continuing to train employees on identifying any potential issues within our operations and supply chain.
4. Updating the assessment of risks of modern slavery in our business and our supply chain.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Kier Group's modern slavery and human trafficking statement for the financial year ending 30 June 2018. It was approved by Kier's board of directors on 18th December 2018.

Signed on behalf of the board of directors by:



Haydn Mursell
Chief Executive
Kier Group plc