

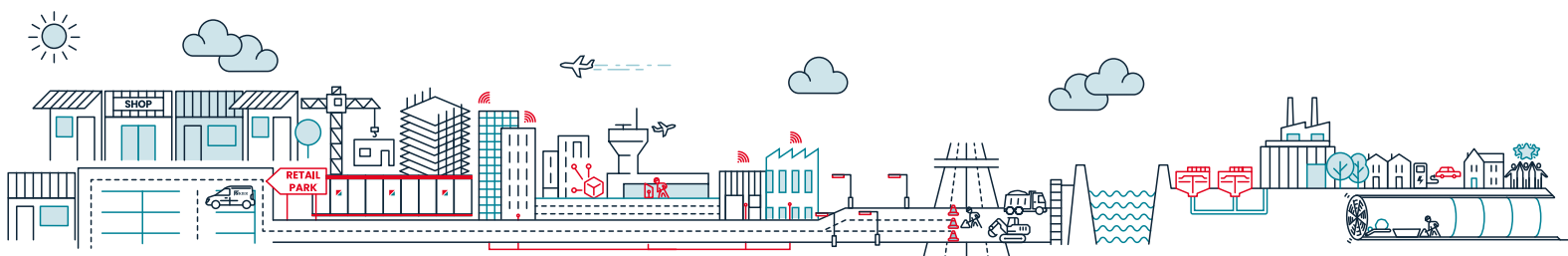
## 1. Purpose/Scope

- 1.1. As a publicly-listed company, it is important that Kier Group plc complies with the disclosure requirements determined by the London Stock Exchange, Financial Conduct Authority and other legislative requirements including keeping investors properly informed about developments that might impact its share price.
- 1.2. All communications issued on behalf of Kier or one of its businesses need to be legally compliant, accurate, not misleading, clear and unambiguous.
- 1.3. This policy clarifies the actions and responsibilities regarding external communication and engagement. This policy is in addition to our Share Dealing and Inside Information policies which must be adhered to with regards to information relevant to the Company.
- 1.4. This policy shall apply to all directors, officers, employees (whether full or part-time), as well as to temporary workers and independent contractors of Kier.
- 1.5. Failure to fulfil these obligations may result in significant liability for Kier and, in some instances, certain directors, officers and employees. It may also result in disciplinary action for employees that breach this policy.

## 2. Policy

- 2.1. Unless otherwise approved, the only people authorised to discuss commercially sensitive, financial and regulatory matters with the news media and investment community (including via any online forums regarding the same) are:
  - Chief Executive Officer (“CEO”)
  - Chief Financial Officer (“CFO”)
  - Corporate Development Director
  - Corporate Affairs Director
  - And other people as may be authorised from time to time on a specific subject matter
- 2.2. No other person may discuss or otherwise disclose material, non-public information with any person outside of the Company. Material information includes but is not limited to:
  - Announcements of earnings or losses
  - Changes in forecasted earnings
  - A pending or prospective merger or acquisition
  - The sale of significant assets, or a significant subsidiary
  - Major changes in senior management
  - Significant developments in actual or threatened litigation
  - New equity or debt offerings

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- Significant tenders
- Commercial positions

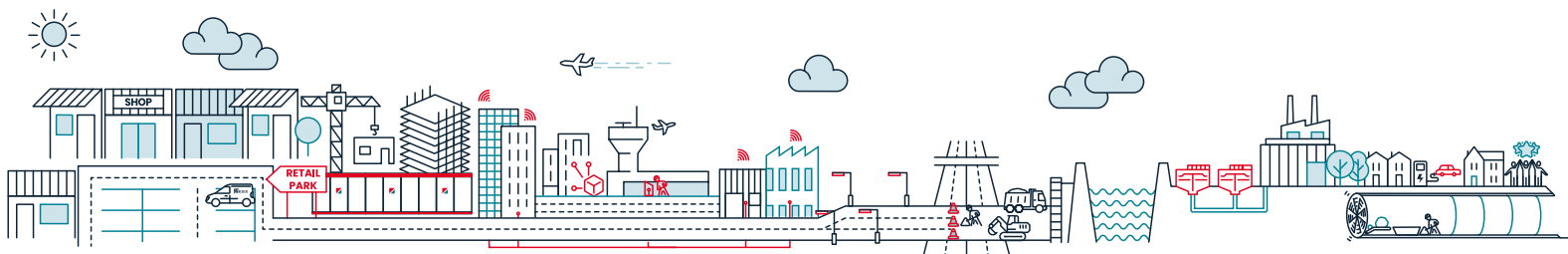
### 3. External Communications and Engagement

- 3.1 Other employees may be authorised media spokespeople on sector developments and issues of public interest but only with prior permission from Group Corporate Affairs. Group Managing Directors are responsible for working with Group Corporate Affairs to authorise individuals to engage with the media. When engaging with the media, authorised employees should follow the guidelines set out in the [Kier Media Guidelines](#).
- 3.2 Kier Regulatory News Service ('RNS') announcements must have the approval of the 'CEO', 'CFO' and the Corporate Development Director.
- 3.3 All Kier press releases must, in the first instance, have prior approval from the Group Corporate Affairs Director and Head of External Communications and Brand, who will determine other approval escalations as required.
- 3.4 If an employee is approached by the media or investment analysts for comment or other input on any matter they must refer the approach to Group Corporate Affairs on 01767 355096 or [corporateaffairs@kier.co.uk](mailto:corporateaffairs@kier.co.uk).
- 3.5 Where an employee or a site or office location is approached by the media or a member of a national or regional government (such as an MP, MSP (in Scotland), an AM (in Wales), or local councillor or any other group (such as a non-governmental organisation or pressure group), regarding a Kier matter or to set up a visit, please contact Group Corporate Affairs immediately for guidance on 01767 355096 or [corporateaffairs@kier.co.uk](mailto:corporateaffairs@kier.co.uk). This also applies in the event that this is carried out by a client or a third party, (**Note:** where the visit is from a Regulator in connection with a regulatory incident or matter, then you are required to follow the Group's Dawn Raids Guidelines, which you can find [here](#)).
- 3.6 Certain situations require prompt/urgent action by the Company. Accordingly, the Company has adopted (i) a [Major Incident Response Plan \(MIRP\)](#) and (ii) Crisis Communications Protocols (CCP) procedures and associated [guidelines](#). The MIRP and/or the CCP must be followed at all relevant times.
- 3.7 From time to time Kier employees may be approached to take part as a speaker or panel member in webinars, seminars, roundtables or similar in relation to topical issues in the industry sectors we participate in. Prior to attending that event the employee should approach Group Corporate Affairs to seek guidance on Kier's positioning.

### 4. Social Media

- 4.1 Kier recognises the importance of social media and that its employees are likely to be active users of social media in their personal lives.

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- 4.2 Only officially–designated Kier spokespersons may use the Kier official social media accounts. When doing so, they must follow the guidelines set out in the [Kier Social Media Guidelines](#).
- 4.3 When using social media in a personal capacity, all employees must be mindful of what they post and must be clear that any such views or comments are their own and not those of the Company. Employees must follow the [Guidelines](#) for behaviours on personal use of social media. Employees must not bring the Group into disrepute when using social media accounts.

## 5. Internal Communications

- 5.1 Internal communications are designed to help colleagues understand the depth and breadth of our capabilities across the Group, while improving knowledge sharing, best practice and lessons learned across teams and departments.
- 5.2 All internal communications should be treated in the same manner as external communications and must be accurate, not misleading, clear and unambiguous and comply with applicable law and regulation.

## 6. Marketing

- 6.1 The Kier brand is a valuable asset. It is important that it is used in an appropriate way at all times in accordance with the Group’s [Brand Guidelines](#).
- 6.2 The Group’s [Brand Guidelines](#) are necessary to ensure that its brand is correctly and consistently used and applied.

## 7. Political donations

- 7.1 Kier is subject to the Political Parties, Elections and Referendums Act 2000 which relates to political donations.
- 7.2 No Kier employee should ever make a political contribution either through a donation or payment of any kind by or on behalf of the company that is not part of a normal, commercial transaction. This could be financial, or it could be a service or resource made to a political party, movement or candidate.

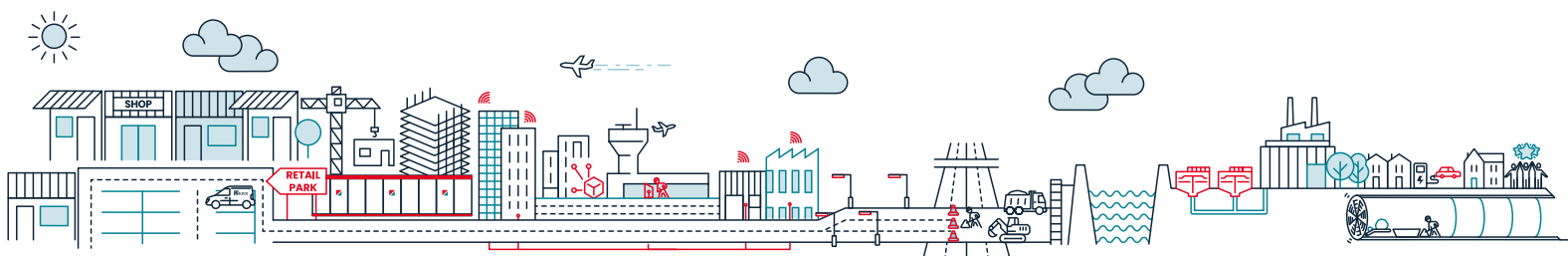
## Disciplinary action

Non-compliance with this policy by employees may result in disciplinary action being taken and may also be a breach of other Kier policies, law or regulation and, therefore, result in civil and criminal penalties.

## Questions?

If you have any questions about this policy or would like further guidance on it or the related guidelines, please contact Sophie Timms, Corporate Affairs Director on: +44 (0)7395 246654 E: [sophie.timms@kier.co.uk](mailto:sophie.timms@kier.co.uk) / [prteam@kier.co.uk](mailto:prteam@kier.co.uk)

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This Policy should be read in conjunction with the [Chief Executive Foreword](#) and the [Media Guidance and Social Media Guidance](#)

**Sophie Timms**  
**Corporate Affairs Director**  
Last Reviewed: July 2022

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