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1. Why we have a communications and marketing policy

As a publicly-listed company and a strategic supplier to the UK Government, Kier must follow certain requirements.

Some are set by the London Stock Exchange, the Financial Conduct Authority, Cabinet Office and other legal and legislative requirements – and there are serious consequences if we don't follow them.

We're responsible for making sure investors are properly informed about anything that might impact the Kier share price, and being transparent about who we talk to in Government.

This means any communication Kier issues (or that can be linked to us) needs to be fair, accurate and clear, and we need to make sure it protects our position legally and reputationally.

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Finally, we have a duty to look after our employees' health and safety, including mental health. Given the potential negative impact that traditional media and particularly social media (including trolling) can have, it's important that we support our employees. This policy outlines how employees can engage while protecting their mental wellbeing.

2. What you need to know

This policy applies to everyone who works for Kier. This includes permanent employees, temporary employees and contractors.

Not following the policy could put Kier at risk of legal or financial penalties and negative reputational impact and lead to disciplinary action for colleagues, so it's important to make sure you're familiar with it and understand your responsibilities.

This policy:

- is linked to, but separate from, our [share dealing](#) and [inside information](#) policies, which must be followed if you're sharing commercial information relevant to the company.
- clarifies the actions and responsibilities for everyone regarding communications and engagement.

3. Dealing with journalists and the media

All requests from journalists should go to the Group Corporate Affairs team in the first instance.

If a journalist contacts you directly, do not comment or share any information with them.

Instead, politely direct them to the [media enquiries page on the Kier website](#) or call 01767 355096.

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Spokespeople

A spokesperson is someone who has been chosen to speak officially on behalf of Kier.

If you are appointed as a Kier spokesperson, you will be contacted by one of our communications' colleagues and given media training. This will help you understand the Kier media guidelines and how to deal with proactive and reactive media requests (including on commercially sensitive, financial and regulatory matters).

If you are not a Kier spokesperson – or if you are, but haven't yet received media training – you must not speak to the media.

What we mean by "the media"

For the purposes of this policy, "the media" means any type of media intended for a large audience. This could include newspapers (print or online), articles in magazines or journals (print or online), websites (including blogs), social media channels and influencers (for example, a YouTube channel), radio, television and podcasts.

4. Press releases & thought leadership

All press releases and thought leadership opportunities must be signed off by the Group Corporate Affairs team before they're sent to the media.

If you've got a release you'd like to send, or someone involved in the project wants to send something out (including the client or a supply chain partner), please send it to [your local communications manager](#) who will share it with the Group team for approval.

All information we share should be verifiable (through a contract or other paperwork), and this will be reviewed before we release – if something can't be verified, we won't be able to send it out. Your communications manager will be able to share with you what verifications will be required, and note these are subject to the Group finance team's review.

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Endorsements for Kier are great, but you should never pay anyone to write one.

All sponsorship opportunities and requests are managed through the Group Corporate Affairs or business division communications team as appropriate, and over a certain amount, prior approval from the CEO and CFO are required. You can read more about this in the [Delegated Authorities](#) information.

5. Government visits, events, roundtables and board positions

Government visits

If you want to set up (or are asked to set up) a meeting, site visit or correspondence with anyone from Government (local or national), trade unions, non-governmental bodies or lobbying groups, please inform your local communications manager.

All such interactions must be shared with Kier's Corporate Affairs director, Sophie Timms, who will be able to advise the best course of action.

Events and roundtables

If you're approached to speak at an event either online, or in person and either on behalf of Kier or where Kier could be associated, please contact your [local communications manager](#), who will seek approval from the Group Corporate Affairs team.

You should not agree to speak at any event until the Group Corporate Affairs has confirmed that is appropriate for you to do so.

They'll make sure you get any training you need and understand Kier's position on the topics you're likely to cover.

Board positions

Before you take on a chair or board position in a charity, school governing body, community interest group, association or political party, or stand as an elected representative, you should notify Kier through our Conflicts Portal (see our [Conflict of Interest policy](#) for details).

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If you already hold such a position and have not yet notified Kier, you should do so as soon as possible.

Once you have notified Kier, our Group Corporate Affairs director will contact you if we need to coordinate on messaging as part of your external role.

6. Acting responsibly online

At Kier, we should all expect respect. We do not tolerate harassment, intolerance and insults at Kier, and social media channels are likely to prohibit this too. Employees who behave in this way maybe subject to disciplinary action being taken against them even if they are interacting on topics that are not work related.

Everyone has the right to express their opinion, even if it's one you disagree with. When you are online on social media platforms and media forums, avoid discussing inflammatory topics and don't engage in negative discussion (and don't feed the trolls). Be respectful, even if you disagree, and if the conversation becomes heated, agree to disagree and leave the conversation.

Please remember that anything you put online leaves a digital legacy or is subject to other people capturing even if you delete it, for example a screenshot being taken. If you make a mistake, own up to it as soon as you can and make any corrections you need to.

If you'd like any advice before publishing (or responding to something), please get in touch with the Group Corporate Affairs team, who'll be able to help. Email: corporateaffairs@kier.co.uk

7. Social media

Social media is one way Kier keeps people updated on important news about the business, and we encourage our colleagues to like, comment and share work-related posts.

However, like all communications, social media comes with some risks – and this can impact both employees' reputations, wellbeing and the Kier brand.

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Use of official Kier social media accounts

Only authorised Kier spokespeople may use the [official Kier social media accounts](#); those who are able to post are approved by the Group Corporate Affairs team.

If you have a great story about one of our projects or people, please share it with your [local communications manager](#) – we always want to show how we are delivering on our purpose and leaving positive legacies.

Use of personal social media accounts

If you mention anywhere on your social media profile that you work for Kier (or mention it in a post or comment), please make it clear that you are expressing your personal opinions and are not acting/commenting on Kier’s behalf.

Please post about any site visits, community visits or interesting things happening in your work day. You don’t have to worry about sounding the same as Kier’s corporate accounts; using your own voice will make anything you post much more authentic and engaging, but please do ensure any photos follow the steps as highlighted in section 9.

You should only post about financial information that’s already in the public domain – for example, trading updates, half-year results or full-year results we have released to the market. Please don’t post about future plans, legal matters or the share price (including confidential or share price-sensitive company information). As we mentioned in the first section of this policy, we have specific rules we need to follow, so only the investor relations and corporate affairs teams should post about these topics.

As a strategic supplier to Government, Kier must remain impartial and non-political. When posting in public forums on topics of public policy, it is important that you make clear you are expressing a personal opinion.

If you’re interacting with Kier posts (including sharing), please make sure that you’re demonstrating our company values and 9 healthy behaviours, and acting responsibly online.

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And if you're posting about under 18s, or creating content with them in mind, please be conscious of specific consent and guidelines around this audience which we must have in place before anything is published. Our corporate affairs team can provide you with further information, contact corporateaffairs@kier.co.uk

You should only post or engage with content online where you are aware of the source of the information, if you're sharing a link, double check that it's appropriate and trustworthy before sharing. Any photos used, you must know the source and, always respect copyright and trademarks of the owners.

If you'd like any advice before publishing or responding to something on social media, please get in touch with the Group Corporate Affairs team at corporateaffairs@kier.co.uk

8. Internal communications (including Your Kier)

Internal communications covers anything we create for our employees; from posters and toolbox talks to emails, Your Kier posts and videos, and everything in between.

Anything we send to employees should be treated the same as external communications – it must be honest, clear and in plain English, as well as complying with laws and regulations.

Posting on Your Kier

Your Kier is our official internal social media channel.

If you're using it to send out community posts, or comment on others' posts, please follow the [Your Kier community guidelines](#) – be kind, constructive and honest.

If you'd like more information on how to use Your Kier effectively, [see our Your Kier help and FAQs](#).

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9. Marketing and the Kier brand

Any use of the Kier logo or branding must be in line with the Kier [brand guidelines](#) and approved by the Group Corporate Affairs team.

You must not use the Kier logo on any materials without explicit approval.

To request approval to use our logo, contact corporateaffairs@kier.co.uk

Photography and videos

Before using any photography in official Kier communications or marketing, it must receive explicit approval from:

- our health, safety and wellbeing team
- any other relevant stakeholders – for example, the client (where required)

You must only use photos or videos of people if they have completed a consent form that grants us permission to use their image. If they have not completed a consent form, you must not use the image/video.

Please contact your [local communications manager](#) if you need support gaining the relevant approvals for photos and videos.

Writing style

If you're writing anything on behalf of Kier, please follow the [Kier writing style guidelines](#).

Awards

Any intention to enter external awards or to attend an awards ceremony should be notified to your [local communications manager](#), in advance.

Exhibiting at an event

If you're looking to book event space at an exhibition to market Kier, this should be agreed with your [local communications manager](#), who will advise you on if the spend of the event requires further levels of sign-off. You can read more about this in the [Delegated Authorities](#) information.

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10. Political donations

Kier is subject to the Political Parties, Elections and Referendums Act 2000 which relates to political donations.

This means Kier employees should not make a political contribution of any kind (including donations, services or resources) on behalf of the company, unless it's part of a normal, commercial transaction.

11. Disciplinary action

Accurate, transparent and respectful communication is vital to Kier. It shows we are a trusted partner for our stakeholders, including clients and prospective clients, Government, employees and potential employees and local communities.

Compliance with this policy is required by your contract of employment. Any employee who doesn't follow the Communications and Marketing Policy may have disciplinary action taken against them.

If they're also in breach of other Kier policies, the law or other regulation, they may also be subject to civil and/or criminal penalties.

12. Who to contact

If you have any questions about this policy or would like further information, please contact:

corporateaffairs@kier.co.uk

For and on behalf of Kier Group plc

Sophie Timms, Corporate Affairs Director

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