

Kier Group plc ('Kier')

Modern Slavery Act 2015 Statement

December 2021

Introduction

Kier is a leading UK construction and infrastructure services group, operating across a range of sectors. A full description of the business and services we offer can be found in our 2021 Annual Report and Accounts at [\[link\]](#)

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 and suppliers which, in turn, will source products from their respective supply chains.

Our policies

We have a number of policies which are designed to manage the risks relating to modern slavery and human trafficking, including our Operating Framework, Code of Conduct, Anti-Slavery and Human Trafficking Policy and Whistleblowing Policy linked to our Sustainability Framework.

These policies confirm our 'zero tolerance' approach to modern slavery and human trafficking in our business and supply-chain. To further underline the importance of this issue it is one of the core pillars of the *Building for a Sustainable World* framework. We are committed to acting ethically and with integrity and to maintaining systems and controls which are designed to prevent modern slavery and human trafficking from 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.

The risks relating to modern slavery and human trafficking can apply anywhere in our operations, whether through direct employment, sub-contracted employees or the supply of materials or services. We expect our suppliers and sub-contractors to ensure that there is no slavery or human trafficking in their own supply-chains. If issues are identified (including through our audit process) which are not resolved to our satisfaction, we review the relationship with the relevant organisation and take remedial action, as appropriate.

Our approach to assessing and managing the risk modern slavery and human trafficking

1. We have a Group-wide policy confirming our 'zero tolerance' approach to modern slavery and human trafficking.
2. We require our sub-contractors and suppliers to acknowledge their responsibility for adhering to our Code of Conduct and our policies relating to modern slavery and human trafficking.
3. We undertake periodic risk assessments to identify the key modern slavery and human trafficking risks in our business and supply chain.
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 sub-contractors and suppliers to complete an assessment to confirm that they comply with Kier's 'zero tolerance' approach to modern slavery and human trafficking. We continue to work with three leading accreditation companies in the UK (namely, Constructionline, Chas and Achilles Building Confidence) to develop the 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 (both on induction and periodically thereafter) to employees and others about modern slavery and human trafficking and how to take steps to prevent it.
9. We monitor the effectiveness of our actions to mitigate the risk of modern slavery and human trafficking, for example by reviewing our policies and our procurement standards and implementing an audit programme (see point 10 below).
10. We undertake audits of certain key supply-chain partners to assess their controls and learn from best practice. From time to time, we will ask these partners to complete follow-up actions. We undertake detailed reviews of a sample of those audits.
11. We have provided support to industry-wide training on modern slavery 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 and in our business and operations. Our work with the GLAA has included developing enhanced training materials to better target training towards our Mental Health First Aiders, who regularly visit our sites, to better enable them to spot the signs of modern slavery.
13. Where we have sourced items directly from certain markets which are considered to have a higher risk of modern slavery or human trafficking, we undertake additional due diligence.
14. We have published our 2020 Modern Slavery Statement on the UK Government's Modern Slavery Act statement registry [\[link\]](#).
15. We monitor, through our new Performance Excellence programme, the implementation of our policies and procedures which relate to modern slavery and human trafficking.

Next steps

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

Next steps will include:

1. Keeping under review our Anti-Slavery and Human Trafficking Policy (and related policies) and the related procurement standards.
2. Continuing to assess the risks of modern slavery and human trafficking in our business and our supply chain.
3. Keeping under review our pre-qualification standards for the appointment of new suppliers and sub-contractors.
4. Reviewing and updating our programme to manage the modern slavery and human trafficking risks associated with high-risk goods and services.
5. Keeping under review the due diligence procedures for our supply-chain, which apply both prior to appointment and thereafter.
6. Auditing key providers of temporary labour.
7. Providing training to our employees on identifying potential modern slavery or human trafficking within our operations and supply chain.
8. Further publicising our independent Speak Up helpline to ensure that any concerns are reported quickly and so that appropriate action can be taken.
9. Providing enhanced training to our mental health first aiders to help them better identify the signs of modern slavery and the key signposts of it occurring.
10. Providing free training to our high-risk suppliers on modern slavery and human trafficking through our support of the Supply Chain Sustainability School.
11. Supporting victims of modern slavery by working with and supporting charities who support them.
12. In conjunction with the GLAA and Social Enterprise Jericho (who focus on looking after victims of slavery and trafficking) rolling out a new video highlighting the issues faced by those who fall into modern slavery.
13. Support people who are at greater risk of exploitation by introducing GLAA Level 1 Worker Rights and Labour Exploitation Course to our training catalogue
14. Further developing KPIs to assess the effectiveness of our management of the modern slavery and human trafficking risks associated with our business.
15. Through from the *Building for a Sustainable World* framework continue to review our sustainable procurement to enhance and further strengthen our support for the supply chain in seeking to eradicate modern slavery

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Kier's modern slavery and human trafficking statement for the financial year ended 30 June 2021. It was approved by Kier's board of directors on 15 December 2021.

Signed on behalf of the board of directors of Kier by:



Andrew OB Davies

**Chief Executive
Kier Group plc**