

This policy should be read alongside:

- Modern slavery statement
- Whistleblowing (Speak Up) policy
- Diversity and inclusion policy
- Mandatory Right to Work requirements

Statement of intent

Kier is committed to conducting our business ethically, lawfully and responsibly and to protect the human rights of everyone in our workforce. This policy outlines Kier's commitment to preventing forced labour, human trafficking, child labour, exploitation, or discrimination in any form as well as supporting fair and lawful employment practices. In support of this commitment, and our obligations under applicable legislation and human rights frameworks, including the Border Security, Asylum and Immigration Act 2025, the Modern Slavery Act 2015, the UN Guiding Principles on Business and Human Rights and the United Nations Universal Declaration of Human Rights, we maintain policies, procedures and controls designed to prevent unlawful employment practices and exploitation as well as to safeguard our workforce in our operations and supply chains.

This policy should be communicated internally and externally through training, onboarding, and supplier engagement processes. It is supported by a due diligence framework, audit protocols, and escalation mechanisms to help ensure compliance and continuous improvement.

Why is it important?

The impact of labour exploitation and modern slavery can be severe for the victims of this crime. As a responsible business, Kier is committed to ensuring that it has systems and controls in place to prevent modern slavery from taking place in our business operations. The way we operate our business is set out in our Code of Conduct – this is

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underpinned by the principle of doing the right thing. Modern slavery is a criminal offence and can carry a prison sentence of up to life imprisonment.

This policy is central to our commitment to ethical business practices and human rights, and to help ensure that all workers are treated fairly and with dignity. Upholding these standards helps prevent exploitation, promotes equality, and supports sustainable business growth.

What should I look out for?

There are a number of indicators that may point to potential labour exploitation or modern slavery. Look out for individuals who:

- Appear to be under the control or influence of others
- Are reluctant to speak, avoid eye contact, or allow others to speak for them
- Do not have access to their own passport, ID, or personal documents
- Wear the same clothes repeatedly or lack suitable clothing for work or weather
- Appear frightened, anxious or hesitant
- Show signs of psychological or physical abuse (e.g. injuries, untreated medical issues)
- Appear malnourished, exhausted, or poorly cared for
- Do not have control over their own money or are unsure about their pay
- Live in inadequate, dirty, or overcrowded accommodation
- Are regularly dropped off or picked up with others, often by the same vehicle or individual
- Work excessive hours or appear unable to refuse work or take breaks.

If you notice any of these behaviours, they must be reported immediately through the reporting channels outlined below. All concerns raised will be investigated confidentially.

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Who does this policy apply to?

Kier expects all colleagues and those who work with us to adhere to the principles outlined in this policy and to demonstrate their commitment through transparent practices, regular audits, and active participation in ethical labour initiatives. This includes acknowledging the rights of indigenous people and ensuring that no group is excluded or disadvantaged. This ethical labour policy applies to all aspects of Kier's operations and its extended supply chain.

Recruitment

Fair recruitment practices play a vital role in protecting and promoting human rights. By recruiting transparently and ethically, we can help to promote respect, safety and fairness for everyone who works with Kier. To safeguard the rights and wellbeing of our workforce, Kier expects:

- All workers to be paid at or above the applicable National Minimum Wage/Living Wage, directly into their own bank account
- All colleagues to be over working age (for Kier purposes 16 years old) and under control measures applicable to our industry. We will not employ children below the minimum school leaving age
- All colleagues to be provided with clear, lawful notice periods and no unfair contract terms
- No worker to be charged additional fees or costs, directly or indirectly, at any stage of the recruitment process
- All original copies of personal and identity documentation to be returned to candidates after they have been checked and verified. There are no circumstances where they should be retained.

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Right to Work

Fair recruitment also means ensuring that everyone working on Kier sites, projects or our offices has the right to carry out the work they are engaged to do. Right to Work checks help prevent illegal working and support our commitment to fair and ethical recruitment.

Kier will carry out the checks for its direct employees. Suppliers, subcontractors and labour providers are responsible for carrying out compliant checks on the people they engage, including workers supplied through lower tiers of their supply chain.

Mandatory Right to Work requirements

- Ensure a prescribed Right to Work check is completed before an individual begins work. No one may start work until the check is complete.
- Carry out follow-up checks before any time-limited permission to work expires.
- Do not engage, or continue to engage, anyone you know or have reasonable cause to believe does not have the right to carry out the relevant work.
- Confirm that the person carrying out the work is the person whose Right to Work was checked, and apply any identity re-verification requirements.
- Keep secure, unalterable evidence of Right to Work checks throughout the duration of the individual's engagement and for two years afterwards.
- Apply equivalent contractual requirements to Kier's suppliers, substitutes and any other labour providers in the contractual chain.
- Make records available and co-operate with Kier assurance activity, audits and any relevant Home Office investigation.
- Notify Kier promptly if you suspect illegal working, identify an issue with Right to Work checks, or enforcement action is taken or threatened.

Kier is committed to preventing illegal working and complying with applicable Right to Work requirements. We are also committed to protecting vulnerable workers and identifying circumstances where exploitation may be present.

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Where concerns arise regarding an individual's Right to Work status, appropriate action will be taken to comply with legal requirements. Where there are indicators of exploitation, these concerns must also be treated as a safeguarding issue and escalated through one of the channels below.

Supply chain responsibilities

Suppliers must maintain proportionate systems and contractual controls to ensure Right to Work compliance throughout their supply chain. This includes checking substitutes before they start, monitoring lower-tier compliance, keeping appropriate records and taking prompt corrective action where concerns are identified.

All suppliers, subcontractors and labour providers must comply with this policy and the Mandatory Right to Work requirements. This document provides detailed requirements, checks, record-keeping standards, reporting routes and practical steps to comply with the law. Suppliers must also follow the latest Home Office guidance and any additional written requirements issued by Kier.

What must I do?

We expect everyone to do the right thing by adhering to Kier's principles and to the [UN Guiding Principles on Business and Human Rights](#). Suppliers are required to communicate this policy and its requirements to their own subcontractors and labour providers, and to cascade these expectations throughout their supply chains

You will:

- Comply with applicable law including the Modern Slavery Act 2015 and the Border Security, Asylum and Immigration Act 2025
- familiarise yourself and require that your colleagues comply with this policy
- remain alert to any signs of modern slavery across our business or supply chain
- only employ individuals who enter employment with us freely and voluntarily, without the threat of penalty, where employees have the freedom of association (for instance, to join a trade union) and have the option to terminate employment

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under specified notice

- communicate Kier's commitment to mitigating the risk of modern slavery and share this policy to our supply chain at the outset of our business relationship with them and at appropriate intervals thereafter
- request that Kier's sub-contractors and suppliers complete a modern slavery assessment (for example, the government administered Modern Slavery Assessment Tool)
- complete relevant modern slavery training
- ensure we follow Kier's procurement standards and carry out appropriate due diligence
- ensure working hours are not excessive
- complete all applicable Right to Work checks on employees and maintain appropriate records
- provide workers with a confidential reporting channel to raise concerns
- report concerns or any known breaches of this policy through one of the reporting channels described below

Proportionality

- Kier recognises that requirements should be proportionate to the risk. SMEs may adopt alternative approaches where appropriate and as agreed with Kier.
- In regard to Right to Work checks, suppliers, contractors and labour providers must comply with this policy and the associated Mandatory Right to Work Requirements document, which sets out the detailed requirements and controls that form part of this policy.

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Reporting mechanisms for raising a concern

Anyone can raise a concern confidentially through either of the below

- It is important that concerns are raised in a timely manner. To raise a concern contact: Group Compliance: compliance@kier.co.uk or
- Our independent Speak Up provider on a confidential basis
- Call 0800 915 1571;
- Email kier@safecall.co.uk; or
- File an online report at www.safecall.co.uk/report

We expect our suppliers to maintain and follow their own internal grievance procedures. Where an allegation arises, suppliers must notify Kier as soon as possible, and in any case within 48 hours.

For and on behalf of Kier Group plc

Stuart Togwell, Chief Executive

September 2026

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