

This policy should be read alongside:

- Modern slavery statement
- Whistleblowing (Speak Up) policy
- Diversity and inclusion policy

Statement of intent

Kier is committed to protecting 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 a business, we are committed to complying with the UN Guiding Principles on Business and Human Rights and the United Nations Universal Declaration of Human Rights, seeking not only to meet our legal obligations under the Modern Slavery Act 2015, but to maintain respect for human rights into the core of 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 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

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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
- Everyone working on our sites or in our offices to be eligible to work in the UK and for 'Right to work' documents to be checked by the workers' employer (i.e. Kier for direct employees and the relevant supplier for our contingent or subcontracted labour). Such checks must be compliant with the Border Security, Asylum and Immigration Act 2025
- 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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What must I do ?

We expect everyone to do the right thing by adhering to these 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

- [Guiding Principles Business HR \(EN\)](#)

You will:

- familiarise and 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 to terminate employment under specified notice
- communicate our 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 our 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 our procurement standards and carry out appropriate due diligence
- ensure working hours are not excessive
- provide workers with a confidential reporting channel to raise concerns
- report concerns or any known breaches of this policy to Group Compliance

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Proportionality

- Kier recognises that requirements should be proportionate to the risk. SMEs may adopt alternative approaches where appropriate and as agreed with Kier.

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**.

This policy is approved by the Kier Board, which holds overall accountability for compliance and oversight.

For and on behalf of Kier Group plc

Stuart Togwell, Chief Executive

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