



Modern Slavery Statement 2025



Contents

Message from our chief executive	3
Introduction	4
Our supply chain	5
Our policies, frameworks and strategies	6
Assessing and managing risk	10
Due diligence	15
Training and awareness	17
Achievements and key performance indicators	19

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Kier Group plc and its subsidiary companies during the year ending 30 June 2025 to prevent modern slavery and human trafficking in our business and supply chain. It has been reviewed and approved by the Kier Group plc Board of Directors and signed by Stuart Togwell, chief executive, on 11 December 2025.



Message from our chief executive

Kier is committed to doing the right thing and we expect our people and our supply chain partners to carry out their activities safely, ethically, and sustainably, in accordance with the law as well as our Code of Conduct and company policies.

We take our responsibility to contribute to tackling the collective challenge of modern slavery seriously, and we are conscious of the risks in our supply chain and how we must partner with them to manage the wellbeing of our workforce.

As a national contractor with a regional footprint delivering buildings and services essential to both the local and national UK economy, we have the ability to influence change by supporting all of our people involved in our business to focus on health, safety and wellbeing at work for everyone involved, in all circumstances and wherever they are based.

In FY25, we have continued to make good progress. We continued to encourage vigilance on our sites and for anyone involved in our operations to report any concerns through our reporting lines. Our independent Speak Up line remains well utilised which helps us to ensure that our working and ethical practices are in line with our values and, in the instances where they fall short, we take appropriate action.

The wellbeing of our people remains important, and we will actively take steps for the fair and equal treatment for our entire workforce, including those in our supply chain. Ultimately, this focus reflects our commitment to respecting the human rights of all our people under the United Nations Guiding Principles on Business and Human Rights.

Stuart Togwell
chief executive



Introduction

Kier is a leading provider of infrastructure services and construction, as well as property development focused on urban regeneration.

Kier is made up of four business divisions – Transportation, Natural Resources, Nuclear & Networks, Construction, and Property, alongside our Group functions. Our purpose is to sustainably deliver infrastructure that is vital to the UK, and we are committed to delivering for communities and leaving lasting legacies through our work.

Our 360 approach embodies who we are and how we operate. We deliver projects and programmes of all sizes, from the development of land to design and construction, through to maintaining and operating the asset.

You can find a full description of our business, company values and the services that we offer on our website kier.co.uk.

c10k
employees

£1.5bn
spent with SMEs inc. VCSEs

6,000+
hours of volunteering
for good causes

£250k
donated to Trussell

80.5%
Employee engagement index

590
Apprentices in Kier's
workforce



Our supply chain

As a major construction and infrastructure company with nationwide reach, our supply chain is global and, consequently, complex. We rely on subcontracted suppliers and workers to deliver on our projects

These factors increase the risk of modern slavery in our operations, as in our wider industry.

We are committed to doing the right thing and actively take steps to help ensure that labour used in our operations is ethically sourced and remunerated fairly.

Using local resources and expertise to deliver our projects is key to driving social impact in the communities we serve.

This is why we support businesses of all sizes to collaborate with us and are developing an onboarding platform to support SMEs, VCSEs and diverse suppliers to start working with Kier.

In FY25, we partnered with a leading supply chain and procurement platform, Local Supply Chain, to connect our buyers with local suppliers to support this effort.

61.8%

subcontracted
spend with
SMEs

3573

suppliers registered
with the Supply Chain
Sustainability School



Our policies, frameworks and strategies

Our policies are designed to help mitigate the risks relating to modern slavery and human trafficking within our operations. They are built into our everyday processes to help uphold the rights of all who work with us, directly or within our supply chain.

Compliance with our policies is monitored continuously and assurance is formalised through our Operating Framework. All breaches of policy are escalated to the Executive Committee through business level assurance statements.



Find out more about our key policies, frameworks and strategies



Code of Conduct

Our Code of Conduct sets out the standards of behaviour and business conduct expected of everyone who works with Kier. These standards are underpinned by our core principle of doing the right thing, which is expected of all individuals when performing their day-to-day duties on behalf of Kier.



Operating Framework

Our Operating Framework sets out the structure in which the Group operates and provides clarity on key roles and responsibilities within our organisation. This, alongside our Code of Conduct, guides the behaviours expected from those who work for Kier, setting out how we do business across the Group.



Building for a Sustainable World Framework

Each pillar of our framework includes topics which are aligned to the priorities of our people and stakeholders, with non-financial metrics chosen to help demonstrate impact and continuous improvement. Our People pillar within our sustainability framework focuses on ethical labour and the fair treatment of our entire workforce.



Anti-slavery and human trafficking policy

Reflecting our commitment to the United Nations Guiding Principles on Business and Human Rights (UNGPs), our anti-slavery and human trafficking policy requires our employees and those who work on our behalf to understand the different forms and indicators of modern slavery and labour exploitation.





Whistleblowing policy

When situations arise that do not meet the standards we expect for conduct and business integrity, we want our people to feel empowered to speak up and report any concerns, suspected wrongdoing or breaches of policy. Our independent reporting line, managed by Safecall, is publicly available and reports can be made confidentially and anonymously by our people, our supply chain and by people in the communities we work in. All concerns raised are investigated and escalated as appropriate. We do not tolerate any form of retaliation against an individual who speaks up and does the right thing. Utilisation of our whistleblowing channels remains above industry benchmarks with 59 cases received in the financial year.



Real Living Wage policy

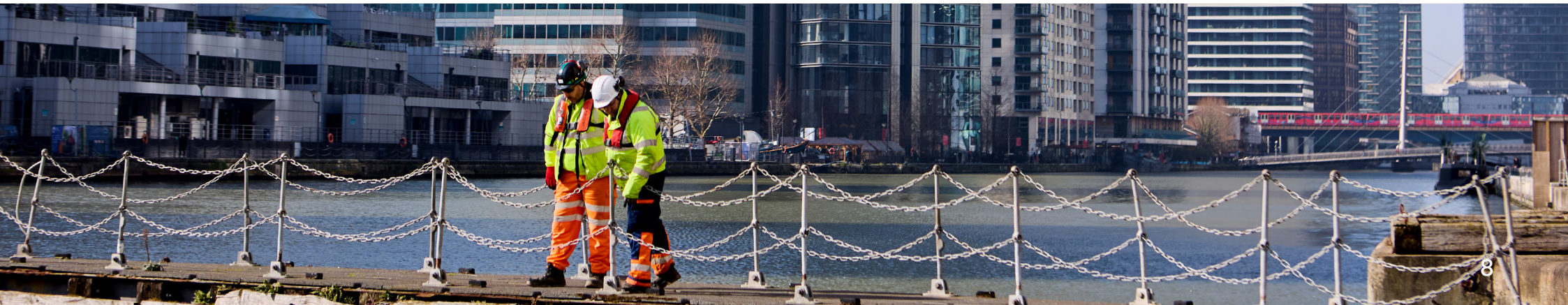
Kier is proud to be a Real Living Wage employer. Our supply chain partners are a key part of our workforce, essential to delivering our projects and our overall success. We are committed to taking steps to ensure that our supply chain is fair and ethical, sustainable and resilient, and that we protect the human rights of everyone we encounter in our business operations.



Strategy for Responsible Procurement

Responsible procurement is a fundamental part of Kier's strategy for a sustainable business. We have set standards for procurement to help us provide lower impact products and services.

59 whistleblowing
reports made





Case study – Investigating ethical labour concerns

A key focus area for Kier in recent years has been raising awareness of modern slavery and ethical labour risks and indicators across our operations, as well as the various reporting methods available to those who have a concern. This year, we saw the positive impact of these efforts when a concern about a subcontractor working on one of our sites in West London was reported through our available channels, providing greater confidence that individuals are better equipped to recognise the indicators and feel empowered to speak up.

The report prompted an internal investigation with the operational team. Utilising data collected via our site management system, we were able to gather useful information about the individuals concerned and a particular subcontractor. As the work they were carrying out had completed, we then identified a nearby site where that same subcontractor was operating on our behalf. A site visit was arranged, followed up by externally led worker interviews. These worker interviews provided a valuable understanding of the lived experience of the operatives, but in this case, no evidence was found to substantiate the initial report. However, this report provided us with an opportunity to review and strengthen our investigation process and reinforced the importance of continuously raising awareness of ethical labour risks and our available reporting mechanisms. The insights gained from this investigation will help to better position our response to concerns of this nature and manage the welfare of our people.

Assessing and managing risk

With a growing demand for infrastructure, construction remains a high-risk sector for modern slavery. We operate with complex supply chains, a significant transient workforce and use large quantities of globally-sourced natural resources. All of these increase our risk for modern slavery in both our operations and our supply chain, a risk which is elevated further through conflicts and climate change.

Our ethical labour strategy was created to help us address these complex challenges. Guided by an approved group-wide modern slavery gap analysis, this strategy is comprised of an action plan which identified four key areas of focus (as identified in our ethical labour strategy) that will make a lasting difference to our business and our supply chain.

Governance

Overall accountability for our modern slavery statement is held by the Board of Directors. The structure of our business is governed by the Operating Framework which is designed to empower and create accountability in the business for its performance. The Framework requires that the group managing director in each division provides assurance regarding compliance in their respective businesses and functions.

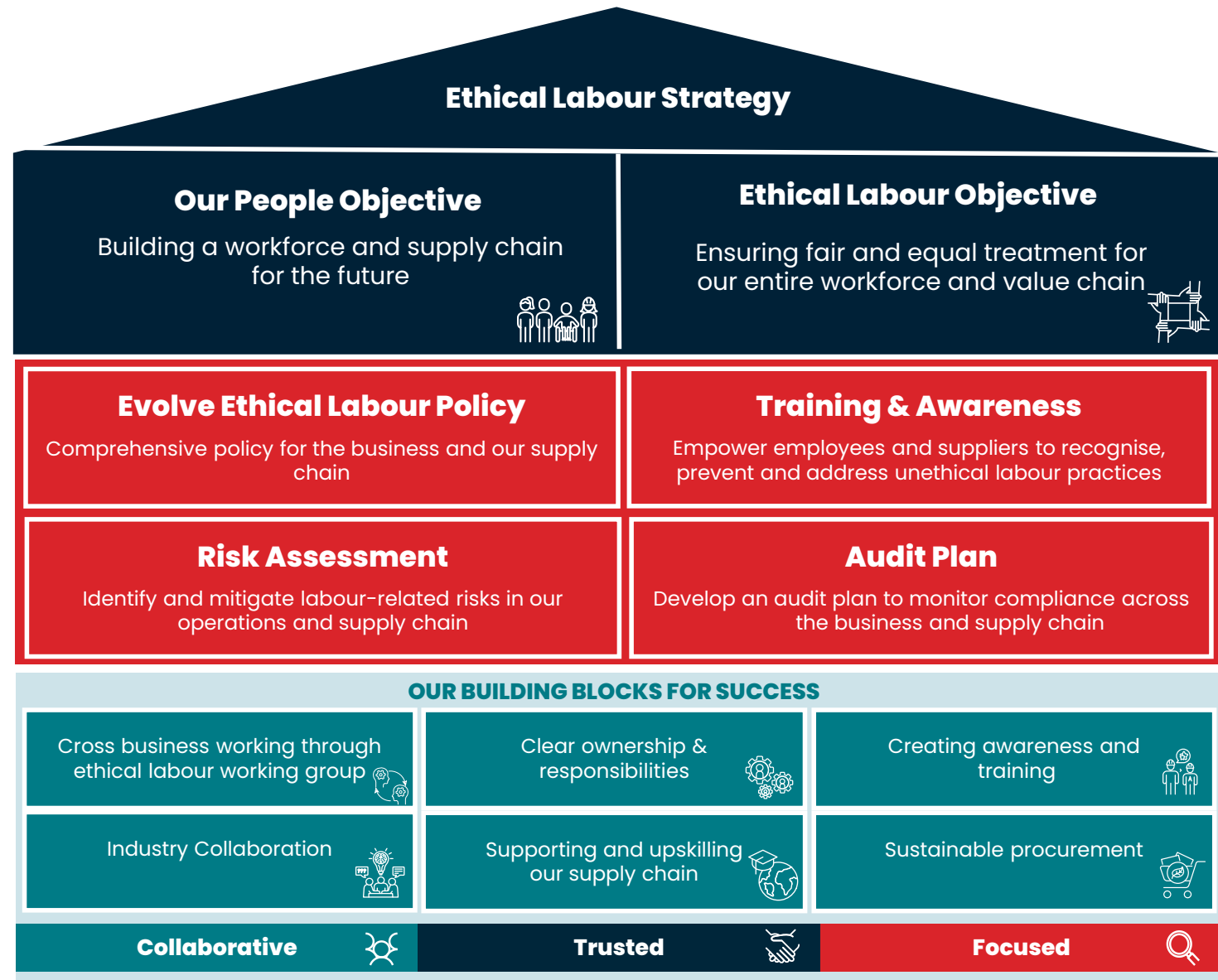
Supplementary to our overall governance structure, our Ethical Labour working group operates as part of our sustainability framework. Oversight and strategic direction is provided by the ESG Committee and the Ethical Labour Steering Group. The working group includes representatives from each of the accountable businesses and meets to develop and implement solutions that are tailored to the day-to-day operations of our businesses.



Ethical labour strategy

Our ethical labour strategy has been created to foster ethical labour practices, at Kier and across our supply chain. Created with strategic guidance from a modern slavery social enterprise, this approach supports us to ensure fair and equal treatment for our entire workforce and value chain.

To implement our strategy, we are targeting four key areas to drive meaningful and lasting change: policy; risk assessment; audit; and training and awareness.



Strategy areas



Evolve Ethical Labour Policy

By strengthening our key frameworks and evolving our current policies, we aim to provide increased clarity to both our business and our supply chain.



Training and awareness

Our aim is to empower employees and supplied workers to recognise, prevent and address unethical labour practices. This will be achieved by upskilling our workforce based on the level of ethical labour risk that they are exposed to.



Risk Assessment

We want to identify opportunities for improvement and mitigate labour-related risks in our operations and supply chain by utilising a targeted, risk-based monitoring programme.



Audit Plan

Our audit approach will help us to better monitor compliance with ethical labour standards in our business and supply chain.



Sustainability risk assessment

To ensure that we continue to drive action across our operational divisions and group functions, we undertake an annual sustainability risk assessment workshop. Focusing on procurement, the assessment aims to highlight our high risk trades and materials. With improved visibility of our key risks, we can better understand how these relate to our operations, identifying improvements and possible mitigations.

Our FY25 workshop, led to the creation of three workstreams to address higher risk of labour exploitation and modern slavery:



Labour agencies

Reviewing the different models for supplying contingent labour being used across the business



Solar panels

Reviewing the purchase practices and requirements for solar panels



Onsite labour data

Improving visibility of onsite, contingent labour to better manage and map risks



Case study – Solar photovoltaic (PV) purchasing standard

We are increasingly using solar technology to power our projects, as an efficient, clean energy source. However, there have been well-documented concerns about forced labour, unsafe conditions and exploitation in the production of some of these panels. At Kier, we are committed to procuring clean energy sources in a way that does not detract from the dignity and wellbeing of workers at every stage.

To help our teams ensure that every panel that we procure is sourced ethically, transparently and in way that protects workers' rights we have, together with our industry peers, taken a lead in developing a solar PV purchasing standard. Introduced with a phased approach, our intention is that by 2027 all solar panels installed on Kier sites, both permanent and non-permanent, must be sourced from a manufacturer that is a member of the Solar Stewardship Initiative (SSI).

The approach we have adopted is a significant enhancement and we intend to make it available for others in our industry to use and help make a difference to those who operate in the solar PV sector.

Due diligence

As a strategic supplier to the UK Government, we support the aims of PPN 02/23 to tackle modern slavery in government supply chains. In line with those aims, as well as our own approach, we expect our people and supply chain to carry out work safely, ethically, and sustainably, in accordance with the law, our Code of Conduct, and our policies. We encourage everyone involved in our operations to report any concerns relating to modern slavery through our reporting channels.

Our teams collaborate to implement our Building for a Sustainable World framework, overseeing aspects such as materials origin and sourcing method, and labour exploitation and modern slavery risks in our supply chain. They ensure that environmental and social considerations, including those related to human rights, are included in supplier contracts and performance reviews. Kier's procurement function is verified to ISO 20400 standards and has been awarded the CIPS Corporate Ethics Kitemark.





Procurement checks

As part of our procurement processes, we have integrated modern slavery due diligence throughout the lifecycle of our contracts. This includes a pre-qualification questionnaire to assess suppliers' processes and policies, supplier premises visits for visual audits and regular discussion of human rights topics during supplier review meetings.



Contractual

Our contractual terms with our supply chain require that they comply with our policies, conduct due diligence for their suppliers and ensure that they appropriately train their teams. They also enable us to carry out audits of our supply chain. All relevant policies are available to our supply chain via a central, Kier-managed online portal.



Audit

We require our suppliers and sub-contractors to take steps to prevent modern slavery and human-trafficking in their own supply chain. By undertaking audits around ethical labour compliance within our supply chain, we can help to identify issues or areas of improvement that we can work together to resolve.

In FY25, we launched our Group Procurement Audit Operating Procedure to guide third party audits of our supply chain, selected using a risk-based approach.

Our risk-based audit programme for FY25 was focused on operational labour. Our efforts were focused on our sites and those providing us with on-site labour. Our site audits were facilitated by an external, independent audit provider who engaged directly with workers to gain insight into the wellbeing and experiences of those procured to work on Kier sites. We also collaborated on a new industry-wide accreditation with Workforce Assured, which is designed to provide a standard for workforce management practices across the sector.

In FY25 audits were conducted on:

5
sites

9 direct
labour
agencies

51 Tier
2 labour
agencies

Training and awareness

Our people, and our supply chain, play a critical role in identifying and preventing modern slavery on our sites and in our wider supply chain. Our aim is to empower employees and supplied workers to recognise, prevent and address unethical labour practices.

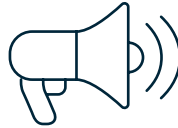


Training

It is mandatory for all staff to complete training (taking into account long-term absences and employee turnover at any given time) on recognising the signs of modern slavery. This training may be delivered online, during a new starter's site induction or through a toolbox talk and is refreshed periodically. The content is tailored to align with the needs of our people depending on their role and working environment.

Further role specific training is being developed to be delivered site-based personnel to further mitigate risks in this area.

It is also important to us as a business that we help to upskill our supply chain. In FY25 we launched a new Kier-specific learning pathway on the Supply Chain Sustainability School, focused on modern slavery and ethical labour.



Awareness

As founding members of the Supply Chain Sustainability School and active members of the School's Built Environment Against Slavery Group, we collaborated with our peers, using our insight to develop training and resources that help to address these risks as an industry. At Kier, we use these resources to raise awareness of modern slavery amongst our workforce and supply chain, alongside internally delivered briefing sessions.

In FY25 we also collaborated with Unseen, a UK anti-slavery charity and 11 industry peers and labour suppliers to create a short film designed to raise awareness of modern slavery in the construction industry.



Beyond the Shadows

92.3%
**of our
colleagues
trained in
recognising
modern
slavery**



“It’s a powerful way to stand alongside survivors and help them receive the safety and assistance that they deserve.”

Case study – Volunteering with the Salvation Army




The Salvation Army hold the government contract to provide specialist support for adult survivors of modern slavery in England and Wales. To access this help individuals must be referred through the National Referral Mechanism (NRM) by a First Responder. First responders record and submit survivor accounts beginning the process to determine if they have been a victim of modern slavery and exploitation.

All employees at Kier are entitled to two days of paid volunteering each year as part of our volunteering policy. These can be used to support their local communities and charities of their choosing. Kimberley, who works to improve the ethical labour practices of our supply chain wanted to do more to support victims of exploitation directly. Utilising one of her volunteering days, in January 2025 she attended an in-person, all-day First Responder workshop. This training covered the different forms of modern slavery, key indicators to look out for and providing trauma-informed communication. It also looked at how to work sensitively across different cultures and languages, an essential skill when supporting survivors from diverse backgrounds.

Now as a trained First Responder, Kimberley helps survivors share their experiences, submit their accounts to the Home Office through the NRM. This process opens the door to life-changing support for affected individuals and is often the first step in helping them rebuild their lives.

Achievements and key performance indicators

Our focus at Kier remains to collaborate with our peers and our supply chain to increase awareness of modern slavery, identify areas of potential risk, and implement appropriate mitigations. We have set stringent targets for ourselves for 2025 and 2026. We were pleased to exceed these in FY25 and will endeavour to do the same in FY26.

Target Area	Indicator	2025 target	2025 actual	2026 target	FY25 Achievements	FY26 Actions
 Collaboration	Working with our strategic suppliers and industry peers to effectively mitigate and manage modern slavery risk, maintaining an average % for 360° feedback from strategic suppliers	>80%	83%	>80%	Creation of a free to access, industry specific video, developed with industry peers to highlight the issue of modern slavery and increasing knowledge of risks and indicators	Creation of practical resources to support our supply chain in achieving our sustainability goals
 Training	Provide tailored and accessible training for all colleagues, with % completion of modern slavery modules	90%	92%	90%	Launch and roll-out of Kier specific modern slavery learning pathways for our supply chain partners through the Supply Chain Sustainability School	Launch of role specific training for site supervisors designed to maximise awareness of modern slavery
 Due diligence	Conduct # ethical labour audits, working with third-party audit providers	4	5	4	Collaborated on a new workforce management accreditation for those providing labour to the sector	Develop a Kier ethical labour standard to be utilised by the Group as part of regular audit programmes

Kier Limited

Registered in England and Wales No. 01611136

Registered office:

2nd Floor,
Optimum House,
Clippers Quay,
Salford,
M50 3XP.

kier.co.uk

Copyright © 2025 Kier Limited

