



# Modern Slavery Statement 2024



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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 2024 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 and signed by Andrew Davies, Chief Executive, on 18 December 2024.

# A message from our chief executive

Kier's purpose is to sustainably deliver infrastructure which is vital to the UK. As a strategic supplier to HM Government and a leading provider of infrastructure services, construction, and property development, we are aware of the risks of modern slavery, and are playing our part to address these in our operations. We are committed to doing the right thing and expect our people and our supply chain to carry out their activities safely, ethically, and sustainably, in accordance with the law, our Code of Conduct, and our policies.

Every year, in our Modern Slavery Statement, we set out the actions we have taken, and continue to take, to prevent human trafficking and forced labour in our own operations, in our supply chain and across our industry.

Our 'Building for a Sustainable World' sustainability framework focuses on ethical labour practices by working towards fair and equal treatment for our entire workforce and value chain. This focus reflects our commitment to respecting the human rights of all people under the United Nations Guiding Principles on Business and Human Rights (UNGPs). We are resolute in our approach to modern slavery. Our culture encourages everyone directly and indirectly involved in our operations to report any concerns through our advertised reporting lines.

We recognise that the dynamic, complex, multi-tiered nature of the UK construction industry can create an environment where vulnerable workers may be exploited. Addressing modern slavery is an industry-wide challenge, which we will not solve alone. This is why we actively collaborate with our peers and supply chain partners, who are a key part of our workforce and essential to delivering our projects. As a strategic supplier to HM Government, we also adhere to PPN 02/23 to tackle modern slavery in government supply chains.

We are pleased with the progress we have made in FY24, which included working with specialist ethical labour advisors to harness good practice and seize opportunities for improvement; training more than 4,000 employees and people in our supply chain to recognise the signs of modern slavery and encourage action; and working with our suppliers to secure compliance with the UK Real Living Wage.

There is more to do, and we are committed to continuous improvement in our business and to helping drive that across our industry. By remaining steadfast in our commitment to safe, ethical, and sustainable behaviours, and to collaboration with our peers, we know that we can gain further traction to help prevent modern slavery.



**Andrew Davies,**  
Chief Executive

# Introduction

Kier is a leading UK infrastructure services, construction and property group.

Our purpose is to sustainably deliver infrastructure which is vital to the UK, and we are committed to delivering for communities and leaving lasting legacies through our work.

We provide specialist design and build capabilities and the knowledge, skills and intellectual capital of our people to ensure we are able to project manage and integrate all aspects of a project.

Total Group revenue – including joint ventures

£4.0bn

Order book

£10.8bn

Number of employees

c.10k

Raised for UK charities through The Kier Foundation

£225k

Spent with SMEs/VCSEs

£1.4bn



You can find a full description of our business, company values and the services we offer in our **2024 Annual Report and Accounts**.

# Our business

Kier is made up of four business divisions that work alongside our central Group services function – Transportation; Natural Resources, Nuclear & Networks; Construction; and Property.



## Transportation



Transportation designs, builds and maintains infrastructure for the highways, rail, aviation and ports sectors. It delivers work for National Highways, Network Rail, Transport for London and HS2 as well as a number of local and combined authorities.



## Natural Resources, Nuclear & Networks



Natural Resources, Nuclear & Networks delivers long-term contracts in maintenance and capital projects to the water, nuclear and energy sectors; and protection of habitats and communities in our natural environment and waterways.



## Construction



Construction comprises our Regional Building, Strategic Projects and Kier Places (workplace solutions, residential solutions and building solutions). Kier is a leading UK national builder, providing project delivery for the public and private sectors across a number of sectors including education, healthcare, defence, justice and borders and commercial.



## Property



Our Property business invests in and develops schemes and sites across the UK. It concentrates on mixed-use commercial and residential development delivered through joint venture partnerships.

# Our policies, frameworks and strategies

We have a number of policies which are designed to manage the risks relating to modern slavery and human trafficking within our businesses. These are built into our everyday processes to help us uphold the rights of all those who work for and with us, be it directly or within our supply chain. We are committed to acting ethically and with integrity and to working together with our supply chain to address the risk of modern slavery and human trafficking.

Summaries of the [key policies, frameworks and strategies](#) follow:

## Code of Conduct

Kier's Code of Conduct sets out the standards of behaviour and business conduct expected from all Kier employees. These standards, underpinned by the principle of doing the right thing, are expected to be adopted by all individuals when they perform their day-to-day duties either as Kier employees or on behalf of Kier. The Code applies everywhere that we operate, regardless of any local laws or local business practices that may permit a lower standard of behaviour.



We collaborate with 75 peer and supply chain organisations to address modern slavery risks.



## Operating Framework

Our Operating Framework sets out the structure within which the Kier 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

Kier's purpose is to sustainably deliver infrastructure which is vital to the UK. Our sustainability framework 'Building for a Sustainable World' focuses on building on the good work that we have undertaken in both environmental protection and creating social value in the communities we work in. It focuses on three pillars - Our People, Our Places and Our Planet. Each pillar includes topics that are aligned to the priorities of our people and stakeholders, with each topic having clearly defined non-financial metrics that have been chosen to help demonstrate impact and continuous improvement. Our People pillar focuses on ethical labour and the fair treatment of our entire workforce.




## Anti-slavery and human trafficking policy

All Kier employees and Kier's supply chain are required to follow the systems and controls we have in place to strengthen our response to modern slavery. To enable Kier to meet our anti-slavery and human trafficking commitments, we require our employees and those who work on our behalf to understand the forms and indicators of modern slavery. This awareness across our business operations helps to mitigate the risk of modern slavery.



# Building for a Sustainable World

**Our purpose** To sustainably deliver infrastructure which is vital to the UK

	Our People	Our Places	Our Planet
Strategic Pillars			
Objectives	Building a workforce & supply chain for the future	Making a positive difference in our local communities	Improving the environment now and for future generations
Topics	Prioritising all our People Ethical Labour	Social Impact Enabling Social Mobility	Climate Action Valuing Nature Resource Efficiency
Measures	% of apprentices and people in training and development programmes Develop ethical labour plan	Spend with SMEs and social enterprises Develop a Social Mobility Plan inclusive of benchmarking	Tonnes of carbon emissions (scope 1-3) / £m revenue Significant Environmental Incident Rate (SEIR) Tonnes waste / £m revenue
<b>% of Group revenue as added social value</b>			
<b>How:</b> Collaboration / Design / Innovation / Sustainability Literacy / Governance			
<b>With:</b> Diversity & Inclusion / Emerging Talent / Health Safety Wellbeing / Talent & Organisational Development / Procurement			

## Whistleblowing policy

As a business, Kier expects the highest standards of conduct and business integrity from every colleague, however we know that from time-to-time things can go wrong. When these situations occur, we want our people to feel empowered to speak up and report any suspected wrongdoing, or breaches of law or policy, so that the issues can be appropriately addressed. Reports can be made anonymously through an independent whistleblowing provider, and all concerns raised are investigated and escalated as appropriate. We do not tolerate any form of retaliation against an individual who speaks up and attempts to do the right thing.

## Strategy for responsible procurement

Our responsible procurement ethos is a fundamental part of Kier's strategy for a sustainable business. We have set standards for ethical and responsible procurement to provide lower impact products and services. We are committed to working with supply chain partners who share our standards and support our objectives to achieving this strategy. We have completed a risk assessment and identified the materials and products that present higher levels of risk or undesirable social and environmental impact. We have employed a risk-based approach to ensure that we give more attention to those areas that could have the greatest potential impact.

## Real Living Wage policy

Kier is proud to be a Real Living Wage employer, and since January 2024, over 1,000 employees received an average Real Living Wage increase of 7.3%. Our supply chain partners are a key part of our workforce, essential to delivering our projects and to the Group's overall success. We are committed to ensuring 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 and in the wider communities where we operate. Our supplier due diligence process supports our aim to work with UK Real Living Wage employers with a public commitment to preventing modern slavery.





# Due diligence

Our due diligence processes enable us to monitor compliance with our policies and frameworks and help us to identify modern slavery and human trafficking risks so that we can respond and take action. These processes require that due diligence is an ongoing activity that is addressed throughout our relationship with our people and supply chain. Our supply chain partners are required to comply with all applicable laws and our policies and are required to pre-qualify to work with us.

## Site onboarding processes

Across our sites, our enhanced labour onboarding processes are available through our workforce management system, Biosite. The system continues to be implemented on our new and current projects and enables a standardised process, ensuring that key messages are delivered, including modern slavery indicators and the mechanism for raising a concern. Workers on our sites are also required to complete a registration process before entering our sites which further reduces the risk. Our worker profiles will play a key role in helping us to consider future areas of focus and improvement.

103 active sites are using Biosite.



## Employee engagement

Kier is Built by Brilliant People™, and they are vital in helping us to identify and address the risks of modern slavery. Our Ethical Labour working group has representation from across all divisions of Kier, and meets regularly to strengthen our procedures and enable us to develop campaigns to raise awareness of modern slavery and ethical labour, equipping our people with the knowledge and tools they need. Our 'Your Kier' mobile application delivers company updates to all our employees ensuring every employee is engaged in company developments. We continue to engage with worker wellbeing initiatives that are rolled out across the business, alongside periodic 'Your Voice' surveys. The surveys conducted in FY24 focused on wellbeing and culture. In line with our culture programme, we have appointed culture champions to help permeate our culture across the business.

## 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, visiting supplier premises to complete a Supplier Premises Inspection form which enables a visual audit, and we continue to raise human rights topics in our supplier review meetings with our preferred suppliers.



We have received the CIPS Ethics Kitemark demonstrating our commitment to ethical sourcing and supplier management.



## Contractual

Our contract terms with our supply chain require that they comply with our policies, implement due diligence for their suppliers and appropriately train their employees. Our policies are all stored and kept up to date in a central, Kier-managed location easily accessible by our supply chain. Our contractual provisions also enable us to carry out audits of our supply chain.

## Audits

We require our suppliers and sub-contractors to take steps to prevent 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 that we can work together to resolve. We conduct a combination of ethical labour focused audits, alongside more general audits with dedicated ethical labour question sets. To target our efforts, we focus our audits on areas of the supply chain that have been identified as being the highest risk.

We completed 12 ethical labour audits on our supply chain in FY24 (FY23: 9).



# Assessing and managing risks

Construction remains a high-risk sector, particularly due to the nature and profile of the businesses that operate within it. The sector operates with complex supply chains and a significant transient workforce. The macro environment, particularly the shortage of skills and materials and, by extension, increased costs and challenges with procurement, raises further risks that we must navigate from a modern slavery perspective. The risk profile is elevated further through conflicts and climate change.

These challenges are complex and we have taken steps to identify and address them. These steps include working with a social enterprise to review our understanding of and response to modern slavery and labour exploitation risks within our business, looking at our current policies and processes and conducting interviews with representatives from across the business. From this review, we have developed a focused plan, centred around education, audit and mitigation.

The assessment gathered insights from our stakeholders to help draw out areas of focus and industry practice. This has helped to inform our priorities to manage modern slavery risk.

The review highlighted areas for improvement including further training and reframing the topic of labour exploitation so it is received by the business in a more impactful manner.

We continually look for ways to improve our internal processes, which we regularly review.

Group-wide gap analysis completed with modern slavery social enterprise.



## Governance

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Overall accountability for the 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 our 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 and is governed by its leadership team and the ESG committee. It 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.

## Internal processes

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All new joiners complete a robust onboarding process. This includes checks to ensure that they are eligible to work in the relevant country of employment, and that they are competent to complete the role they have been hired for.

We deliver training to all employees, both on induction and periodically thereafter. This training has been redesigned with dedicated modern slavery content, utilising animated scenarios to engage learners and present content in an impactful manner. Our aim is for our people to be aware of the issues of modern slavery and human trafficking and feel empowered to take the necessary steps to help prevent it. We have also helped to develop and implement industry-wide training through the Supply Chain Sustainability School.



# 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. Modern slavery awareness training is provided to all colleagues as part of the mandatory training they must complete as employees of Kier and is refreshed regularly. This training may be delivered online, during a new starters site induction or through a toolbox talk and is tailored to best meet the needs of our people depending on their role and working environment.

All Kier employees have access to training through the Supply Chain Sustainability School, alongside Lunch and Learns that are held internally.






In FY24, we launched Kier Learn, a new dynamic system that hosts all mandatory compliance, safety and job-specific training, and can be tailored to the learner's requirements. With strengthened accessibility and automation, our people have improved oversight of their mandatory training and we can utilise the available metrics to better target additional support when it is required by certain teams or regions.

All colleagues receive modern slavery training as part of our continuous cycle of learning, in FY24 more than 4,000 colleagues completed modern slavery training.



# Achievements and next steps

In our financial year 2024, our attention has been focused on developing an ethical labour plan, that aims to increase awareness, identify potential risk areas implement appropriate mitigations.

Target Areas	Achievements	FY25 Actions	
<b>Collaboration</b> 	By partnering with a modern slavery social enterprise for strategic guidance, we have been able to review and assess our response to modern slavery and labour exploitation risks across our business	Collaborate with industry peers on modern slavery training and awareness to increase knowledge of risks and issues	
<b>Due diligence</b> 	We have conducted a series of ethical audits and widened the scope of more general audits to better identify areas of concern	Complete a procurement and supplier risk assessment, alongside development of an assessment standard together with an ongoing monitoring programme and risk-based audits with an ongoing monitoring programme and risk-based audits	Widen scope of audit activities to include worker voice interviews and wider worker engagement
<b>Policy</b> 	Refreshed our modern slavery statement to improve transparency and better demonstrate our progress	Review all internal policies and strategies relevant to ethical labour and responsible sourcing to ensure consistent approach and messaging	Create guidance and support resources for our supply chain to define the standards we expect of them are clear and they have the tools to help them navigate the complexities of responsible sourcing
<b>Remediation</b> 	Over 1,000 employees in our business and supply chain received a Real Living Wage increase in FY24	Formally document our escalation and remediation process to guide our people in managing ethical labour incidents or concerns, including guidance on relevant safeguarding procedures and post-incident review steps to maximise lessons learned	
<b>Training</b> 	We have redesigned the modern slavery training delivered to our operative community, focusing on animated, scenario-based learning with content that is concise, relevant and memorable	Deliver role-specific training to roles and functions that can have the greatest impact in progressing our ethical labour strategy	

## Kier Limited

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