



Dear colleagues

One of my priorities as Chief Executive is our people.

Our business is built on the fundamental behaviours and actions of our people and the way we work, both with each other and our external stakeholders. This code of conduct sets out the basic requirements we expect from all Kier colleagues, to ensure that we continue to protect and enhance our company's reputation.

Kier is a well respected business, built on solid foundations. Our reputation, credibility and heritage have taken a long time to build but can be lost in an instant. We depend on our people to help us maintain and grow our brand and build our track record for excellence. If you see any behaviour or actions which fall short of the standards set out in this code of conduct then I ask you all to speak up using the independent, confidential helpline detailed overleaf.

All information shared on the Speak Up helpline will be treated with respect, and I'm counting on each of you to play your part in making Kier as good as it can be.

Haydn Mursell
Chief Executive

1. We operate a safe business

No task is so important or urgent that it cannot be done safely. We are responsible for working in a manner that protects the health and safety of ourselves, our colleagues and all those people we come into contact with. We should act at all times in a manner that ensures compliance with all applicable safety and health requirements.

We provide training, awareness and necessary equipment as required. We utilise our trained advisors to promote our standards in our business, to our supply chain partners and in the communities in which we operate.

Simple examples of what is expected at Kier

- ✓ Kier never expects me to put safety to one side to get the job done
- ✓ My line manager wants to make sure we all get home safely every night, and will not allow me to work outside of Kier standards



2. We treat people fairly

Everyone deserves a chance to succeed based on hard work, capability and commitment to Kier. We support our employees through training and mentoring to make the most of themselves.

A key pillar on which our principles rest is to treat others as you would wish to be treated yourself.

Our aim is to provide a great place to work, where our employees know they are valued. We believe a workforce that is treated fairly is more engaged and more productive.

Employee diversity is an asset and provides competitive advantage for our business. People of all ages, from different cultures and with a range of different experiences help us understand and serve our customers best. This means having respect for gender, diversity, religious beliefs, disability, sexual orientation and people's human rights.

Through an open and inclusive culture we are able to retain and attract great people who deliver the best results.

Simple examples of what is expected at Kier

- ✓ Kier does the right thing by me
- ✓ Kier listens to what I have to say



3. We care about the communities we work in

We will care about the communities we work in as if we live there ourselves. When operating a building site, we will try to act as a good neighbour and avoid creating unnecessary noise, dust or traffic.

When providing services, we will always behave as though we were the beneficiaries of those services.

We will respect the rights of the residents of the properties in which we work.

We support communities by donating time, expertise and money to local projects.

Simple examples of what is expected at Kier

- ✓ Kier schedules working patterns to try to minimise any disturbance
- ✓ Kier encourages me to support my local community



4. We comply with the law and compete fairly

Complying with the law is mandatory for us all. Illegal acts take many forms, such as paying or receiving bribes, taking dangerous shortcuts or ignoring environmental issues or competition laws. They are unacceptable and expose Kier to significant liability, risk of prosecution, loss of public trust and severe damage to our hard won reputation. There can also be serious personal consequences for those involved.

Kier doesn't collude with competitors or obtain confidential information belonging to others. Kier wins work on merit and competes fairly against its competitors.

Kier expects employees to conduct business in compliance with the law and in a way that protects our reputation for high ethical standards. We expect those who work for us to follow the same standards, be they contractors, agents or temporary workers.

If you are asked or expected to do something that doesn't feel right, then speak up. Kier positively encourages anyone to raise concerns, which you can do through our confidential Speak Up helpline – see overleaf for how to do this.

Simple examples of what is expected at Kier

- ✓ In bidding for a contract, Kier is straightforward to deal with and acts ethically
- ✓ Kier wins contracts because we put together the best bids based on quality and price



5. We respect the environment we work in

As a business we can have a significant impact on the environment in which we live and operate. It's an inevitable consequence of being in business.

Our goal is to reduce the negative impacts and enhance the positive impacts we have on the environment, through effective communication, training and adoption of the best solutions available.

As a responsible business, we are trying to minimise our carbon footprint, prevent pollution and source materials in a responsible way. We expect every employee to play a part whether it is simply using the recycling facilities available or taking responsibility for the environmental impact of our business activity.

Simple examples of what is expected at Kier

- ✓ Kier works quickly and tidily
- ✓ Kier takes great care to ensure that all waste is properly dealt with and recycled as far as possible





For more information please visit our policy centre by following this [link](#).



6. We aim to deliver the best customer and client experience

Our reputation depends on how our customers and clients view us. Their experiences drive everything we do.

Our job is to make their world work better. We set high standards for customer and client satisfaction. Our customers and clients are our priority and we want to deliver their projects and services on time and on budget. This is the same expectation we would have of anyone providing a service to us.

This code of conduct helps us to meet our customers' and clients' expectations.

Simple examples of what is expected at Kier

- ✔ Kier finishes projects on time and to a high standard
- ✔ Kier provides innovative solutions to its customers' and clients' requests

7. We act in the best interests of our customers and clients and Kier

We protect Kier's reputation and act ethically, with integrity, openness and honesty in all our dealings. We will protect Kier's financial standing and not disclose or release information which could give an unfair advantage to a rival or competitor, or personal advantage to an individual. Anyone employed by Kier will be taken on merit, and not their relationship to anyone connected with our business.

We will not let personal or outside business interests impact on making the right decisions for Kier. If you have a potential conflict of interest you must declare it. For example, if a close family member has an interest or involvement with a supplier, customer or client you declare it so that management can prevent the risk of favouritism, even if unintentional. Or, if you hold price sensitive information about Kier, you will not trade in the company's shares.

Simple examples of what is expected at Kier

- ✔ Kier only uses suppliers and sub-contractors who share our values
- ✔ Kier expects its employees to act with integrity and to create a culture of mutual respect



8. We maintain accurate records

Maintaining accurate books and records is important because it allows us to properly invoice our customers and clients for work we have done, to report to our shareholders with confidence about the underlying business, and to ensure that we are able to pay all of our employees the correct amount at the right time.

Our customers and clients expect our records to be accurate so that they know they are paying the right amount for the job. Our investors expect our information to be accurate so they can make good investment decisions. To do this our records must be complete, accurate and comply with relevant accounting rules.

Given the nature of the services we deliver, we have a legal duty to maintain records of how buildings were put together or how services were delivered to ensure any future issues can be dealt with.

Simple examples of what is expected at Kier

- ✔ Kier's data is spot on
- ✔ Our information enables us to have confidence that we can run projects effectively



What if these principles don't apply?

No code of conduct can address every situation you will face. When these eight principles don't address the situation, what should you do? The answer lies in our values. Let them guide your actions.



What if something goes wrong?

Sometimes things can go wrong. We all can make mistakes. So if you notice something has gone wrong what do you do?

You must not ignore it – our policy requires you to report it. Ignoring it does not solve it – it often makes it worse.

Speak to your manager, your HR representative or someone from the legal or compliance teams.

Alternatively you can always use the Speak Up helpline, run by an independent third party where you can remain anonymous. The number is 0800 915 1571.

If you have any questions ask your line manager, your HR representative or someone from either the legal or compliance teams.

You can contact David Foster – Group Compliance Director - or any member of the Group compliance team on 01767 355788 or at compliance@kier.co.uk

Your code of conduct

