

Kier Group plc ('Kier')
Modern Slavery Act 2015 Statement
December 2022

Introduction

Kier is a leading UK construction and infrastructure services group, operating across a range of sectors. A full description of the business and services we offer can be found in our 2022 Annual Report and Accounts [here](#).

We employ c. 10,000 employees and they, along with a large number of subcontractors, work together across our operations. This close working relationship means that our supply chain is an extension to our business.

Our policies

We have a number of policies which are designed to manage the risks relating to modern slavery and human trafficking, including our Operating Framework, Code of Conduct, Real Living Wage, Anti-Slavery and Human Trafficking Policy, Employee Handbook, Strategy for Responsible Procurement and Whistleblowing Policy. These are linked to our 'Building for a Sustainable World' framework.

These policies confirm our 'zero tolerance' approach and commitment to protecting the human rights of those working within our business and also within our supply chain. We are committed to acting ethically and with integrity and to maintaining systems and controls which are designed to prevent modern slavery and human trafficking from taking place in our business or across our supply chain. Our Whistleblowing Policy provides a mechanism for our employees and others working in our supply chain to report suspected breaches of these policies.

The risks relating to modern slavery and human trafficking can apply anywhere in our operations, whether through direct employment, sub-contracted employees or the supply of materials or services. We require our suppliers and subcontractors to ensure that there is no slavery or human trafficking in their own supply-chains. If issues are identified (including through our audit process) which are not resolved to our satisfaction, we review these with the relevant organisation(s) and take remedial action, as appropriate.

Our approach to assessing and managing the risk of modern slavery and human trafficking

Construction remains a high-risk sector particularly due to the nature and profile of the businesses that operate within it i.e. significant transient workforce and complex supply chains. 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.

These challenges are complex and we have taken steps to identify and address them. We continually look for ways to improve our internal processes, which we regularly review. Some of our actions from the past year are highlighted below.

1. We have a Group-wide policy that is regularly reviewed and which confirms our 'zero tolerance' approach and commitment to protecting against modern slavery of our employees and those within our supply chain
2. We require our sub-contractors and suppliers to acknowledge their responsibility for adhering to our Code of Conduct and our policies relating to modern slavery and human trafficking
3. We undertake periodic risk assessments to identify the key modern slavery and human trafficking risks in our business and supply chain
4. We have issued standards for certain high-risk categories of materials and products. We keep these standards under review
5. Our contractual terms include obligations on our sub-contractors and suppliers to comply with our policies, including our Anti-Slavery and Human Trafficking Policy
6. We require our sub-contractors to complete an assessment that is checked by an accredited third party to verify legal compliance consistent with our 'zero tolerance' approach
7. We undertake checks on new joiners to ensure that they are eligible to work in the relevant country of employment
8. We deliver training (both on induction and periodically thereafter) to employees and our supply chain about modern slavery and human trafficking and how to take steps to prevent it
9. We undertake audits of certain key supply chain partners to assess their controls and learn from best practice. From time to time, we will ask these partners to complete follow-up actions. We undertake detailed reviews of a sample of those audits
10. We have helped to develop and implement industry-wide training on modern slavery through the Supply Chain

Sustainability School

11. We are working with the Gangmasters & Labour Abuse Authority (GLAA) and others to drive awareness of modern slavery issues and best practice in the construction sector and in our business and operations. In collaboration with Jericho, we have trained our Mental Health First Aiders to raise awareness and spot the signs of modern slavery on site
12. We have put in place a risk matrix to inform our due diligence approach when sourcing items directly from certain markets which are considered to have a higher risk of modern slavery
13. We have published our Financial Year 2021 Modern Slavery Statement on the UK Government's Modern Slavery Act statement registry [\[link\]](#).

In our Financial Year 2022, we set out additional steps to monitor the effectiveness of our actions against modern slavery and human trafficking. The table below sets out our targets and the action taken over the previous 12 months.

Target	Action
Keeping under review our Anti-Slavery and Human Trafficking Policy (and related policies) and the related procurement standards	
Continuing to assess the risks of modern slavery and human trafficking in our business and our supply chain	
Keeping under review our pre-qualification standards for the appointment of new suppliers and sub-contractors	
Reviewing and updating our programme to manage the modern slavery and human trafficking risks associated with high-risk goods and services	All of these actions were completed and are under regular review in line with our business-as-usual practices
Keeping under review the due diligence procedures for our supply chain, which apply both prior to appointment and thereafter	
Auditing key providers of temporary labour	
Providing training to our employees on identifying potential modern slavery or human trafficking within our operations and supply chain	This is part of our mandatory training for all new starters. Existing employees must complete a refresher every two years
Continuing to raise awareness of our independent Speak Up helpline to ensure that any concerns are reported quickly and so that appropriate action can be taken	
Providing free training to our high-risk suppliers on modern slavery and human trafficking through our support of the Supply Chain Sustainability School	To raise awareness of our Speak Up helpline we have included a Modern Slavery toolbox talk in our site induction process which also publicises our Speak Up helpline, placed Speak Up posters on our sites and launched a mobile phone application that details our Speak Up helpline to our employees and our supply chain. We continue to make support available to our supply chain through the Supply Chain Sustainability School
Providing enhanced training to our mental health first aiders to help them better identify the signs of modern slavery and the key signposts of it occurring	
Supporting victims of modern slavery by working with and supporting charities who support them	
In conjunction with the GLAA and Social Enterprise Jericho (who focus on looking after victims of slavery and trafficking) rolling out a new video highlighting the issues faced by those who fall into modern slavery	We've provided enhanced training to our Mental Health First Aiders with our charity partner, Jericho (who supports the victims of modern slavery) with plans to further roll-out this training to teams that regularly visit our projects. We've also created an awareness video in collaboration with the GLAA and Jericho
Support people who are at greater risk of exploitation by introducing GLAA Level 1 Worker Rights and Labour Exploitation Course to our training catalogue	Ongoing
Further developing KPIs to assess the effectiveness of our management of the modern slavery and human trafficking risks associated with our business	
Through our <i>Building for a Sustainable World</i> framework continue to review our approach to sustainable procurement to enhance and further strengthen our support for the supply chain in seeking to eradicate modern slavery	This will form part of our Building for a Sustainable World strategy in 2023

Next steps

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking. Next steps will include:

1. Developing KPIs to assess the effectiveness of our management of the modern slavery and human trafficking risks associated with our business
2. Creating new Speak Up posters focused on different signs of modern slavery and include the Chartered Institute of Building and Construction Industry Training Board supported 'SOS hand signal' to show a non-verbal way for victims to raise an alert that they need help on site
3. Including the SOS hand signal in the mandatory modern slavery training for employees
4. Exploring with 3rd party organisations ways to further develop our processes, including enhancing our audit process
5. Developing a toolkit to provide improved ways of identifying supply chain risk related to modern slavery including how to mitigate or manage the risk
6. Rolling out our workforce management system across our sites which will enable us to have robust attendance records as well as enabling our subcontractors to confirm their employees' right to work
7. Utilising our workforce management system to enable better visibility on the demography of our workforce to help inform further initiatives, including making toolbox talks available in relevant languages
8. Exploring opportunities to work with charities with a view to providing support to modern slavery 'survivors', including offering employment with Kier
9. Working with our subcontractors and their supply chain to drive compliance with our Real Living Wage policy
10. In line with our Building for a Sustainable World framework, establish a working group to explore ways to further improve our processes.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Kier's modern slavery and human trafficking statement for the financial year ended 30 June 2022. It was approved by Kier's board of directors on 14 December 2022.

Signed on behalf of the board of directors of Kier by:



Andrew OB Davies

**Chief Executive
Kier Group plc**