



# Whistleblowing

## Policy

## Introduction

Our Code of Business Conduct sets out our values and challenges us to work to the standards we set ourselves as a company. Our ways of working are there to protect us and create an environment in which fairness, integrity and respect are common standards.

It's the job of each of us to make sure that's how it stays. We all play a part in keeping our values and ways of working alive and relevant in our day-to-day activities. Sometimes this will mean facing difficult situations when we must stand up and challenge behaviour or practices we think are wrong.

When this happens, it is important for all of us to know that we will always be supported by the Company. It can take courage to speak up for what is right. We want everyone to know that we stand behind those who find that courage.

## Policy objectives

As a company, Keller promises to safeguard all those who defend our principles and ensure no retaliation is taken against them. All we ask is that your concern is genuine. We treat all concerns seriously, conducting investigations and taking appropriate actions. Engaging in illegal activities or undermining our principles may result in disciplinary or corrective actions, up to and including dismissal.

As an employee, or as someone working on Keller's premises, you may see or suspect misconduct. This policy is to guide you on what to do if you discover misconduct at work and provide a clear and confidential internal process for people to report their concerns. It should help you to report your concerns to a person who can investigate and deal with them independently and without delay.

By way of guidance, misconduct at work includes any criminal offence, breach of the law, miscarriage of justice, danger to the health and safety of any individual, damage to the environment, deliberate concealment of the aforementioned or any deliberate breach of our Code of Business Conduct. There must also be a reasonable belief that the disclosure is within the public interest. The policy is not meant for general operational issues, which should be raised in the normal way with your line manager.

## Reporting a Concern at Work

If you have a genuine concern that you wish to report, try to speak up at the earliest opportunity, ideally to your line manager. If you are uncomfortable with this or you prefer to talk to someone else, then you can contact your local Ethics and Compliance Officer or a member of your local HR or Legal teams.

If you don't feel comfortable talking to anyone at work, you can use a confidential and anonymous reporting line operated by Safecall, a completely independent company that specialises in handling concerns at work. The reporting line is available 24 hours a day, seven days a week and your query can be supported in many different languages. Safecall can be contacted in the following ways:

- By telephone - A list of telephone numbers for can be found at <https://www.safecall.co.uk/en/file-a-report/telephone-numbers/> and in our Code of Business Conduct
- By email - You can email [keller@safecall.co.uk](mailto:keller@safecall.co.uk)
- Online - You can file a report via their website at <https://www.safecall.co.uk/en/file-a-report/>

They'll take details of your concern and send a report to Keller.

However you report your concern, it will be investigated without delay and the person looking into it will respect your confidentiality. Your concerns will be treated seriously and, if appropriate, you will be kept informed of action taken.

You will not be dismissed or disadvantaged as a result of reporting any genuine and reasonably held concern about misconduct at work. Disciplinary action will be taken against anyone who treats you unfairly because you have reported such concern.

Keller secures that local law on the reporting of concerns at work is always followed.

## Scope

This policy applies to:

- all legal entities which Keller Group plc wholly owns, has a majority stake in or overall operational control of
- all suppliers and associated third parties of Keller Group

## Governance

The Sustainability Committee and the Audit and Risk Committee of the Keller Group plc Board provide oversight of this policy.

## Responsibilities

This policy applies to all individuals who are employed by, or carry out work on behalf of, any Keller group company including contractors, temporary staff and agency workers.

## Supporting information

- Code of Business Conduct
- Supply Chain Code of Business Conduct

## Document change history

Policy status	FINAL
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