



Modern slavery and human trafficking statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ended 31 December 2019.

Introduction

We expect all of our directors, officers and employees and those working on our behalf to comply with the law and act ethically and with integrity at all times, as set out in Keller's Code of Business Conduct. This statement sets out the steps Keller has taken and continues to take to ensure that modern slavery and human trafficking is not taking place in its business or any part of its supply chain.

Our business

We are the world's largest geotechnical solutions specialist, operating across six continents. For the year ended 31 December 2019, our annual Group revenue was £2.3bn. The Group employs around 10,000 people and performs over 7,000 contracts a year, the majority of which are short duration and less than £325k. The Group has three Divisions: North America, EMEA and Asia-Pacific.

Our strategy is to be the preferred international geotechnical specialist contractor focused on sustainable markets and attractive projects which we will achieve through our four strategic levers:

1. A balanced portfolio;
2. Engineered solutions;
3. Operational excellence; and
4. Expertise, scale and sustainability

Our business model is set out below.

In providing geotechnical solutions, Keller operates in the initial stages of the construction value chain.

Whilst the value chain and construction process varies significantly from project to project, Keller is typically the first contractor on-site and the first off-site. Ensuring our work is done efficiently is critical for our customers in saving them money and providing a sound platform for the remaining work on a project.

Our projects are often for a short duration and the majority have an average value of less than £325,000. We work across the construction spectrum. Very often we will joint venture with a main contractor on a bid.

Depending on the nature of a project, Keller may provide insights into design and other phases of the construction process but generally value is created and captured principally from our groundwork activities.

Our products and services are not just about foundations for construction but are most commonly geotechnical solutions to complex construction projects from solving for terrain and water pressure in constructing a dam to the foundations for a major stadium.

We are unique given our market-leading positions derived from combinations of technology, scale and customer relationship leadership.

1 Our unique ways of working

Value Engineering

- Industry leading geotechnical designer engineers
- Full Computer Aided Design (CAD) and Building Information Modelling (BIM) capability
- Innovation shared across the Keller globe

Full product range/high asset base

- The widest range of geotechnical techniques
- Over 1200 rigs and cranes across the world

Global network, local presence

- Regional offices in all locations where we operate
- Knowledge of local soils and conditions
- Global capability to deliver the largest projects

Best practice knowledge and asset sharing

- Access to global experts and best practice
- Global project teams
- Sharing of resources across borders
- Technology
- Leaders in data acquisition
- Investment in research and development

Government and regulators

- Contribute to developing codes and standards
- Present on national trade bodies

Employees

- High levels of knowledge and expertise
- Low staff turnover
- Global training standards

Safety and sustainability

- Continuing to improve our Accident Frequency Rate (AFR)
- Reducing carbon footprint

2 Our Value stream

We are unique in that our global strength and knowledge is joined with our local presence and focus. As a connected group of industry-leading companies, we can bring this to bear on projects of any size and complexity.

What we do:

Opportunity identification

- Local businesses with relationships (general contractors, consulting engineers and developers) and knowledge to identify demand.
- A global network to support cross-border collaboration (major projects typically involve cross-border demand identification and capture).

Proposal preparation

- Design engineers and cost estimators with local ground knowledge and capacity to create optimum solutions.
- Market-leading portfolio of products and services.
- A global network of professionals on hand to support any team with solution development.

Contract agreement

- Commercial teams trained in relevant local laws who can set up contracts that are fair to all parties.
- Experience of large scale project contracting and group scale make Keller a reliable partner in even the most demanding circumstances.

Project execution

- Product-specific operations teams and equipment with capacity to deliver efficiently and effectively (to quality and schedule) and respond to any issues arising.
- Flexibility to move equipment and resources between markets to match local demand.

Feedback and learning

- Project leadership focused on achieving client sign-off and securing payment.
- Lessons learnt are retained and transferred to the rest of the group (eg Engineering and Operations teams transfer learning on techniques and productivity improvements).

3 Stakeholder outcomes

Employees

- Local and global opportunities
- Development and training
- Long-term employment

Customers

- Benefit from global strength and local focus
- Provision of cost effective geotechnical solutions

Investors

- Stable business with a long term track record
- Continued growth opportunities

Communities

- Local employment
- Charitable events
- Sustainable commitments

Further information about the Group can be found on our website at www.keller.com.

Our Code of Business Conduct

Our Code of Business Conduct, which was refreshed and relaunched in 2016, sets out the minimum expectations for all of our employees wherever they are based and whichever Keller business they work for. At the heart of our Code is the simple principle that we always follow the law. To make sure we follow the law, we have developed nine ways of working, supported by our Group policies. Beyond the law and our ways of working, we must always be guided by Keller's values: Integrity. Collaboration. Excellence. The Code is available on our website and was launched throughout our business through a communications and training programme that started in December 2016.

The Code specifically states that Keller values, supports and protects the rights and dignity of the individual and will refuse the use of child labour and forced labour under any circumstances. We also make clear that employees, customers, contractors or any person should not be harmed as a result of work we do or services we provide.

Our Group policies, standards and procedures also provide guidance on our expectations. Those relevant to this statement include:

- Human Resources Policy
- Health, Safety and Wellbeing Policy
- Sustainability Policy
- Procurement Policy
- Whistleblowing Policy

The Code and the policies can be found [here](#).

Human rights and labour standards

Keller supports the UN Global Compact and aims to adhere with its 10 principles in the areas of anti-corruption, environment, human rights and labour. We expect our supply chain to encourage and work with their own supply chain to ensure they also work to meet the principles of the UN Global Compact (www.unglobalcompact.org/what-is-gc/mission/principles). We expect Keller's supply chain to respect the human rights of their employees and contractors and treat them fairly, in accordance with all applicable laws.

In addition to requiring compliance with its Code of Business Conduct under existing contracts, suppliers

are required to adhere to a new Supply Chain Code of Conduct, launched in 2017.

Supply chain companies should:

- comply with all applicable child labour laws;
- set working hours, wages and overtime pay in compliance with all applicable laws. Workers should be paid at least the minimum legal wage or a wage that meets local industry standards, whatever is greater;
- ensure the work relationship between their workers and the supplier is freely chosen and free from threats and that all workers are free to leave their employment or work after giving reasonable notice in compliance with all applicable laws;
- comply with all applicable laws on harassment and abuse of employees;
- employ workers on the basis of their ability to do the job, not on the basis of their personal characteristics or beliefs (including race, colour, gender, ethnicity, nationality, religion, sexual orientation, age, disability, maternity or marital status);
- allow freedom of association. Workers must be free to join associations of their own choosing and have the freedom of collective bargaining where the local law confers such rights; and
- have adequate policies and reliable systems to prevent the use of illegally or unethically sourced materials, in particular policies and systems to procure steel, cement and concrete from appropriate sources, and provide supporting data on its supply chain for those materials to Keller promptly when requested.

Supply chain companies should not:

- use any forced or child labour; or
- subject their employees to psychological, verbal, sexual, or physical harassment or any other form of abuse.

Compliance

Keller has reserved the right to assess and monitor suppliers' compliance with our Code of Business Conduct and Supply Chain Code of Conduct. Any non-compliant suppliers are expected to implement corrective actions or they will not be considered for future business.

Further steps to be taken and ongoing monitoring

We believe that the risk of slavery and human trafficking within our own organisation is substantially mitigated as a result of our strong collective sense of vision and purpose, our cultural values and commitment to ethical behavior, supported by our policies and procedures. However, we are not complacent and recognise that there is always more that can be done.

We have constituted a Working Group, consisting of representatives from Legal, Procurement and Human Resources, which is responsible for communicating and raising awareness of the requirements under the Act to our employees, carrying out assessments of our supply chains and monitoring compliance. The Group reports to the Group Ethics and Compliance Officer. Progress will be reported through to our Health, Safety, Environment and Quality Committee and reported on in future Modern slavery and human trafficking statements.

Board approval

This statement was approved by the Board on 26 February 2020 and signed on its behalf by:



Michael Speakman
Chief Executive Officer
Keller Group plc