



Our ways of working

Keller Group plc  
Code of business conduct

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To request any of the documents listed in this code contact [secretariat@keller.com](mailto:secretariat@keller.com) or go to [www.keller.com](http://www.keller.com)

# Introduction

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Our code of business conduct sets out our minimum expectations for all colleagues, wherever we are based and whichever Keller business we work for.

## **Our code brings together three things to keep us safe:**

1. At the heart of our code is the simple principle that we always follow the law. The trust of our customers and other stakeholders depends on our reputation as a law-abiding business.
2. To make sure we follow the law, we have developed nine ways of working, supported by our group policies, to provide us with a protective layer of information, guidance and support to ensure that we know how the rules apply to us.
3. Beyond the law and our ways of working, we must always be guided by Keller's values. These can guide us when we make difficult decisions.

## **Our values**

These ensure that we always do the right thing for our colleagues, customers, shareholders and communities – often going further than just complying with the law and our ways of working.

### **Integrity**

We always behave with integrity towards our customers, colleagues and the communities within which we work.

### **Collaboration**

Our teams collaborate across borders and disciplines to bring our customers the best of Keller and to build a stronger business for the future.

### **Excellence**

In all we do, we target excellence. Whether it's geotechnical engineering, safety, project management or people development, we strive to deliver to the highest standards.



## **The law**

We must always follow the law – it sits at the heart of customer trust in Keller.

## **Our ways of working**

These provide a protective layer of information, guidance and support to ensure we don't break the law.

# Introduction

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As employees of Keller, we all have a responsibility to create a company we can be proud of.

**A company's success is often measured in financial terms, that is, how much it grows and how profitable it is. While these indicators are necessary, they can never describe the full story. A company clearly needs to perform well in other dimensions. It has to create satisfied customers, it needs to obey national laws, it should create value for the wider communities and, of course, it needs to create a sense of community amongst its employees. How we do these things at Keller will determine how proud we feel about the company we work for.**

How we behave as individuals really matters, not only in terms of the direct results of our actions but also because our behaviour influences others around us – we all collectively contribute to the Keller culture. We all want a positive culture that makes us successful financially **and** ensures we operate in the right way. This code of business conduct is an important pillar of our Keller culture.

**There are two distinct types of situation we should consider:**

**When the situation is clear.** Examples would be compliance with employment law, or following our safety procedures on a job site. Our responsibility as individuals is to understand the rules and procedures that we should follow and to live up to that standard at all times. As a leader you must ensure your teams have access to the right information and that we are following up on areas where we need to improve. We all need to contribute to making our rules and procedures 'real' – sensibly designed and practical so that we can rightly expect our teams to adhere to them.

**The second area is when a situation is less clear cut.** An example would be a supplier inviting you out for a meal – should you accept or decline? Here we are relying on guidelines rather than strict rules and we expect our employees to make practical judgments considering the actual situation.

We can help shape these judgments by listing examples with recommendations but we cannot list every real life scenario. We are relying on all of you to build up a collective sense of behaviours, and ultimately values, that we apply to all situations. The code encourages you to talk to others in these cases which is important to make the right judgment in each situation and equally importantly it will help share a common 'Keller way' of doing things right.

There have been many high profile failures of individual and collective conduct in some notable companies around the world. The penalties in terms of company reputation and financial penalties can be enormous. This is a serious subject and we must get it right. However, in addition to following the rules and guidelines to protect the company reputation, if we all also adopt the behaviours and values that this code outlines, we can ensure a vibrant and positive culture that will make us successful in all senses of the word.

# Our nine ways of working

## 1. Keeping everyone healthy and safe

We believe no one should be harmed as a result of any work we do – so everyone stays safe and well.

## 2. Supporting employees' rights and diversity

We value, support and protect the rights and dignity of the individual and the diversity of our people – so we are all treated with respect.

## 3. Maintaining ethical and honest behaviour

We are always honest, act with integrity and comply with the law – so everyone trusts us.

## 4. Staying free from bribery and corruption

We always make sure we are free from bribery and corruption and win projects fairly – so people know our decisions are made for the right reasons.

## 5. Keeping our communications open and responsible

We communicate openly, honestly, clearly and responsibly.

## 6. Delivering excellent customer service and working with our suppliers to ensure our standards are adhered to

We work to meet our customers' needs and exceed their expectations – so they work with us again and again. We ensure we build constructive relationships with our suppliers and they understand our principles and the standards we operate by.

## 7. Working within the community

We act responsibly and respectfully towards the communities we work in because we are a part of them.

## 8. Protecting our environment

We respect and protect the environment, and aim to have a positive impact on it - so we safeguard the future.

## 9. Standing up for what's right

We always speak up when we believe our principles are being undermined – so we uphold our principles together.



# 1 Keeping everyone healthy and safe

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We believe no one should be harmed as a result of any work we do – so everyone stays safe and well.

## What we stand for

We believe that neither employees, customers, contractors or any person should be harmed as a result of work we do or services we provide. We are strongly committed to achieving an incident-free environment. We always make sure we have the right health and safety standards and procedures in place, along with the right tools and equipment.

We understand that safety is the responsibility of everyone. We make sure all employees, contractors and third parties are properly trained and feel confident to challenge and report unsafe practices.

We actively monitor the effects our work might have on health, and ensure everyone on our team is fit and healthy to do their job competently and responsibly.

We constantly seek to eliminate the causes of accidents and risks, learning from every incident so it can never happen again.

## Why it is important

- We care about people. In our business carelessness, lack of planning and lack of leadership, can result in serious accidents and even deaths.
- Safety is at the heart of who we are and how we work. If we fail to implement the right procedures or maintain exacting standards of care for our people and the public, we put others in risky situations.

## Further information

- Health, Safety and Wellbeing Policy
- Our wellbeing foundations
- Sustainability Policy



# 2 Supporting employees' rights and diversity

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We value, support and protect the rights and dignity of the individual and the diversity of our people – so we are all treated with respect.

## What we stand for

We are committed to being a diverse and inclusive place to work, reflecting the world in which we operate. Our Inclusion Commitments bring together what we are doing to ensure this.

We work together to create an environment where we all have equal opportunities to achieve our full potential, talent is recognised and developed and we're encouraged to deliver exceptional performance.

We believe in treating everyone equally with fairness, encouragement and respect.

We won't tolerate any behaviour or attitudes that discriminate against anyone, or coerce, intimidate, bully or harass others, or threaten them with verbal or physical violence and we encourage people to speak up whenever we see such things happening.

We support every individual's human rights and refuse the use of child labour and forced labour under any circumstances.

We ensure that no employee is discriminated against due to their gender, race, religion, national origin, sexual preference or gender identity.

We expect all of our colleagues and those working on our behalf to comply with the law and act ethically and with integrity at all times. The modern slavery and human trafficking statement sets out the steps we have taken, and continue to take, to ensure that modern slavery and human trafficking are not taking place in our business or any part of our supply chain.

## Why it is important

- How we treat each other is fundamental to who we are and what we want to be as a business.
- Abuse, exploitation, slavery and discrimination are opposed to all that we value and wish to uphold wherever we work in the world.
- Where all our people can flourish equally, we know we will flourish. Making the best use of our talent will benefit our business, people and society.



## Further information

- Human Resources Policy
- We are Keller: Our Inclusion Commitments
- Modern slavery and human trafficking statement

# 3 Maintaining ethical and honest behaviour

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We are always honest, act with integrity and comply with the law – so everyone trusts us.

## What we stand for

We believe our responsibility is greater than simply complying with the law.

We believe in establishing enduring and equal relationships with all our stakeholders, because we're confident that good ethics leads to good business.

We always set out to act in our customers' interests, to the highest standards of excellence, never gaining advantage through dishonest or uncompetitive means.

We depend on the skills, excellence and goodwill of those who work with us.

We make sure their standards and practices are consistent with ours.

We never seek to bully or cheat our contractors or suppliers, and ensure they are fully, fairly and promptly paid for their services.

We are transparent in all our dealings with government and regulators, fulfilling our obligations honestly and promptly.

We educate and train our employees to ensure compliance with the law, including government rules and regulations.

We pay our fair share of tax and never engage in tax evasion or facilitate tax evasion by anyone else. Our tax strategy is clear about this.

We have the same expectations of legality, ethics, and integrity of our supply chain. Our goal is that by working together, we can build a sustainable business relationship for both parties. We outline our expectations for our supply chain conduct regarding labour and human rights, health and safety, environmental protection, ethics, and management practices in our supply chain code of conduct.

## Why it is important

- Our reputation for integrity is perhaps our most valuable business asset. If we lose it through dishonesty or because we're discovered trying to do something that's underhand, unfair or unethical, we also lose our customers' trust and those who work with us.
- Just one act of dishonesty, and sometimes even the suspicion of it, can destroy our credibility, our share price, our working relationships – and our future.

## Further information

- Competition Law Compliance Policy
- Procurement Policy
- Supply chain code of conduct
- Tax Strategy
- Modern slavery and human trafficking statement



# 4

## Staying free from bribery and corruption

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We always make sure we are free from bribery and corruption – so people know our decisions are made for the right reasons.

### What we stand for

We believe in always doing our business legally and ethically. So we never offer or accept bribes, or participate in any kind of fraudulent or corrupt practice, even when not to do so would clearly result in commercial loss.

We avoid political donations and giving or receiving money, gifts or favours that could influence someone's decision or be open to misinterpretation. We understand that offering or accepting proportionate hospitalities is fine.

We win projects fairly – even if others play unfair.

Our principle is to respect the traditions and cultures of the countries and communities in which we work, always applying the highest ethical standards and rejecting illegal activities.

Payments to public officials to carry out or speed up a process ('facilitation payments') are prohibited – but we understand that we should not put our lives, liberty or property at risk. If we feel coerced or extorted into making a payment we report the payment to our manager and local Ethics and Compliance Officer as soon as possible.

We will not penalise anyone for refusing to pay a bribe, make a facilitation payment or engage in any form of fraudulent or corrupt activity, even if that refusal results in a loss of business to us.

We believe prevention is better than cure and have the right procedures in place. If we have any doubts about what we should do, we speak to our manager or Ethics and Compliance Officer.

We expect our supply chain to comply with the law and act ethically and with integrity at all times. Our goal is that by working together, we can build a sustainable business relationship for both parties. We outline our expectations for our supply chain conduct regarding labour and human rights, health and safety, environmental protection, ethics, and management practices in our supply chain code of conduct.

### Why it is important

- We are strongly committed to enhancing ethical practices worldwide.
- Even if a bribe might be 'customary' and help obtain or retain a contract, any corrupt activity could seriously damage our business and our reputation.
- The legal consequences of non-compliance, including large penalties and/or imprisonment, are too high to be ignored.

### Further information

- Anti-bribery and Anti-fraud Policy
- Competition Law Compliance Policy
- Procurement Policy
- Supply chain code of conduct



# 5

## Keeping our communications open and responsible

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We communicate openly, honestly, clearly and responsibly.

### What we stand for

We don't hide information others should know; we don't disclose information we shouldn't. We're clear and honest about our products, services, processes, policies, achievements and prospects.

So:

- we tell people what they need to know in good time
- we always try to inform; we never try to mislead
- we make sure what we say is accurate, appropriate, clearly stated, and clearly understood
- we listen
- we keep trying to get better.

We want our customers to know that we keep any confidential information or data we have about them safe and secure.

We don't try to get information about our competitors through any unlawful or dishonest means.

We want our employees to feel respected and to respect us.

We help our employees to deal in the company's shares without breaking the law, ensuring that there is transparency in their dealings.

### Why it is important

- Clear two-way communication is at the heart of great teamwork and successful projects.
- Information that's unclear or misleading, not given when it should be – or given when it shouldn't – can obstruct progress and is potentially dangerous.
- We need our stakeholders to trust us. What we say about ourselves and them, how we say it and when we say it, has a vital role in creating or destroying that trust.

### Further information

- Share dealings code
- Information Policy
- Whistleblowing Policy
- Privacy Policy



# 6

## Delivering excellent customer service and working with our suppliers to ensure our standards are adhered to

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We work to meet our customers' needs and exceed their expectations – so they work with us again and again

### What we stand for

We expect our supply chain to comply with the law and act ethically and with integrity at all times. We outline our expectations for our supply chain regarding labour and human rights, health and safety, environmental protection, ethics and management practices in our supply chain code of conduct.

We treat our suppliers fairly and ensure we build constructive relationships with our suppliers and they understand our ways of working and the standards we operate by.

We want our customers to trust and value the products and services we provide to them, meeting and exceeding their expectations every time we deal with them.

We go the extra mile to ensure the services and products we offer are consistently excellent, reliable, safe and appropriate.

We do our utmost to make it easy for our customers to contact us, dealing speedily, efficiently and courteously with their enquiries and concerns, being honest and open and taking personal ownership for solving their problems.

### Why it is important

- Customers have choice and access to information that helps them choose. Our products and services must be consistently excellent in order to give customers confidence in the service we provide.
- We aim to give customers positive experiences and leave them feeling valued.
- If we do this, we will delight our customers and they will recommend us to others.
- Building strong relationships with our suppliers will enable us to obtain the best value, service and quality.
- We want to work with suppliers who understand us and adhere to our ways of working.

### Further information

- Quality and Continuous Improvement Policy
- Supply chain code of conduct



# 7 Working within the community

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We act responsibly and respectfully towards the communities we work in – because we are part of them.

## What we stand for

We want our work to bring value to the community, not distress.

We are always aware of the impact our activities might have and ensure they are carried out considerately, with minimum disruption.

We care about the concerns of local communities and know how important it is for people to feel they are being heard. We believe in communicating, listening and trying to act on concerns whenever we can. We provide people with a complaints procedure and we take their complaints seriously.

We seek to play a positive and beneficial role in the wider community through charitable partnerships and by encouraging and supporting our employees to participate in community events.

Our Charitable Giving Policy is an important part of our approach to building strong community relationships and ensuring our work creates a positive legacy that helps local communities to thrive. Charitable donations, whether in the form of money or donations in-kind (such as time, products, or services), are an important part of our commitment to our stakeholders.

We support both local and global good causes, and we actively encourage our employees to get involved with both fundraising and volunteering.

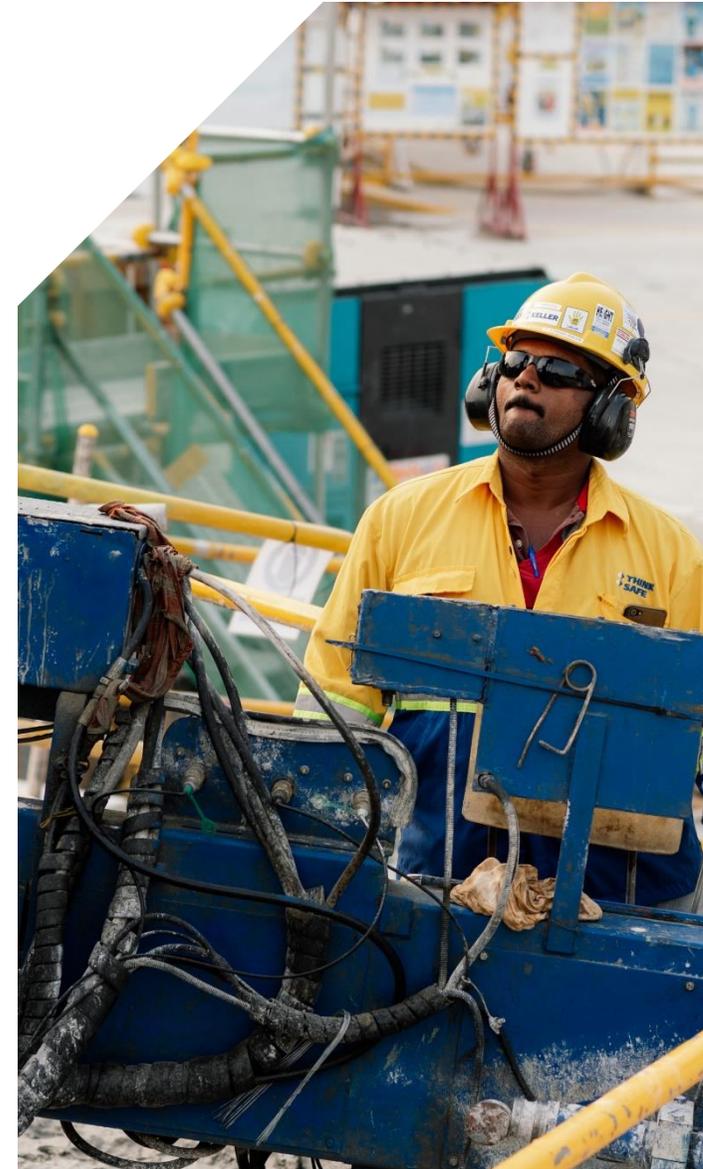
## Why it is important

What we do is an integral part of the community and the community is ultimately our customer.

Poor relationships damage and can even destroy our reputation. Good relationships win us goodwill.

## Further information

- Sustainability Policy
- Charitable Giving Policy





# Protecting our environment

We respect and protect the environment, and aim to have a positive impact on it – so we safeguard the future.

## What we stand for

We want to protect and improve our environment for the future, not destroy it. We choose to set environmental standards that require us to go beyond minimum legal requirements and we'll continue to raise the bar for the future.

We make sure our suppliers have consistent environmental standards and controls.

We make improving our environmental impact a core part of what we do by building it into projects we undertake.

## Why it is important

Acting responsibly and sensitively towards the environment and taking environmental issues seriously, is key to how we are judged as a business. Clients, investors, auditors and other stakeholders ultimately hold us to account for our environmental performance.

## Further information

- Sustainability Policy
- Supply chain code of conduct



# 9 Standing up for what's right

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We always speak up when we believe our ways of working are being undermined – so we uphold our ways of working together.

## **Our ways of working**

Our ways of working are there to challenge us and ensure we work to the standards we set ourselves as a company. They are also there to protect us and create an environment in which fairness, integrity and respect are the norm.

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.

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.

## **What to do**

We provide a clear and confidential process for people to report their concerns:

- Try to speak up at the earliest opportunity, ideally to your line management.
- If you feel you can't do this, think about contacting one of your senior managers or the executives named in our Whistleblowing Policy.

- If you don't feel comfortable to talk to anyone at work, you can use a confidential reporting line operated by Safecall, a completely independent company that specialises in handling concerns at work. They'll take details of your concern and send a report to Keller. Please refer to the phone numbers given on page 16 of this document.

## **Further information**

- Whistleblowing Policy

# Last thoughts

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Each of us also plays an important role in helping one another to find the right answer.

This is especially true of our leaders and senior managers.

We need people who lead by example, who are a role model for others, who act and decide according to our principles, so we know we can go to them when we need advice.

There's always someone to help. If you're not sure what to do, just ask your manager, your local Ethics and Compliance Officer or a colleague. Or phone Safecall. Please refer to the phone numbers given on page 16. You can also email [keller@safecall.co.uk](mailto:keller@safecall.co.uk)

If you need additional support or advice, there are more resources to help guide you to the right decisions. You can find translations and details of all the Keller Group policies on [www.keller.com](http://www.keller.com) and further briefing material is available from your local Ethics and Compliance Officer.

New challenges and issues emerge all the time, so now and again we'll be updating our ways of working to keep them relevant and we welcome everyone's input to help make each new version better than the last.

Remember – we all hold our company in our hands. What we do, or fail to do, defines the environment we work in and can enhance or destroy the reputation of Keller.

Thank you for using your judgment to help us follow these ways of working in all that we do.

Please contact us with your feedback or to request any of the documents listed in this code on: [secretariat@keller.com](mailto:secretariat@keller.com)



# 9

## Safecall numbers around the group

Division	Telephone number
<b>North America</b>	
Canada	1 877 5998073
United States	1 866 9013295
<b>Europe</b>	
United Kingdom	0800 9151571
Austria	00800 72332255
Czech Republic	00800 72332255
Denmark	00800 72332255
Finland	990 800 72332255 Telia Sonera 99980012332255 Elisa
France	00800 72332255
Germany	00800 72332255
Greece	00800 44141966
Italy	00800 72332255
Kazakhstan	8800 333 3499
Netherlands	00800 72332255
Poland	00800 72332255
Portugal	00800 72332255
Romania	0372 741 942
Russia	810 800 72332255
Slovakia	0800 004 996
Spain	00800 72332255
Sweden	0850 252122
Switzerland	00800 72332255
Turkey	00800 4488 20729
Ukraine	0800 502436

Division	Telephone number
<b>AMEA</b>	
<b>Asia-Pacific</b>	
India	000800 4401256
Indonesia	001 803 440884
Indonesia	007 803 440884 PT Telekom
Malaysia	1800 220054
Singapore	800 448 1773
Vietnam	12011157 VNPT
Vietnam	121 020036 Mobifone
Vietnam	122 80725 Viettel
Australia	1800 312928
New Zealand	00800 72332255
<b>Middle East</b>	
Bahrain	8000 4264
Oman	800 72323
Qatar	8000250
Saudi Arabia	800 8442067
UAE	8000 4413376
<b>Africa</b>	
Algeria	+44 191 5167764
Angola	+44 191 5167764
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D. R. of Congo	+44 191 5167764
Egypt	0800 0000059
Ghana	+44 191 5167764
Ivory Coast	+44 191 5167764

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Morocco	8000 96071
Mozambique	+44 191 5167764
Namibia	+44 191 5167764
Seychelles	+44 191 5167764
South Africa	0800 990243
Swaziland	+44 191 5167764
Tanzania	+44 191 5167764
Tunisia	+44 191 5167764
<b>South America</b>	
Brazil	0800 8921750
Chile	800 200734
Colombia	01800 944 8040
Guadeloupe	+44 191 5167769
Mexico	01800 1231758
Panama	00800 0449854
Peru	0800 77601