



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 2023.

Introduction

We require 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.

At Keller, we recognise that modern slavery and human trafficking are significant human rights issues. 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 five continents. For the year ended 31 December 2023, our annual Group revenue was £3.0bn. The Group employs around 9,500 people and performs over 5,500 contracts a year. The Group has three Divisions: North America, Europe, and Asia, Middle East and Africa (AMEA).

Our strategy is to be the preferred international geotechnical specialist contractor focused on sustainable markets and attractive projects generating sustained value for our stakeholders.

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 £500,000. 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 differentiated ways of working

Global strength, local focus

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

Best solutions

- The widest range of geotechnical techniques
- Innovation shared across the Keller globe

Assets and specialist skills

- c.1200 rigs and cranes across the world
- Industry leading geotechnical design engineers
- Full Computer Aided Design (CAD) and Building Information Modelling (BIM) capability

Safety and sustainability

- We have a proven track record of one of the lowest accident frequency rates in our industry
- Reducing carbon footprint

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

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

Customers

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

Employees

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

Shareholders

- 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 sets out the minimum requirements 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, as detailed in the Code. 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. Ethics and compliance training is carried out across the Group annually which includes modern slavery/human trafficking training.

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 must 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 requirements. Those relevant to this statement include:

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

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

Human rights and labour standards in our supply chains

Due to the breadth of our operations, including geographies and industry sectors, we recognise that we need to be vigilant to the risk of slavery in our supply chains.

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 require 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 require 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 suppliers to comply with our Code of Business Conduct under existing contracts, suppliers are required to adhere to Keller's Supply Chain Code of Business Conduct, which is available [here](#).

Supply chain companies must:

- comply with all applicable child labour laws;
- set working hours, wages and overtime pay in compliance with all applicable laws. Workers must 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 by ensuring a safe and inclusive work environment;

- 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 must 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 Business Conduct. Any non-compliant suppliers are required to implement corrective actions or they will not be considered for future business.

During the financial year ended 2023, Keller has engaged outside legal counsel to review its approach to managing the risks associated with human rights in its operations. During the year, Keller has strengthened its processes through:

- engaging with the Board and Executive leadership team to raise the understanding of the risks to the business and our approach to drive awareness and compliance with our standards through the organisation and our supply chain
- establishing a Human Rights Policy which sets out Keller's required standards and communicating it throughout Keller
- issuing new supplier contractual wording throughout our businesses to ensure we are covering all appropriate areas of risk related to modern slavery and human trafficking
- enhancing due diligence processes within our supply chain and embedding them into our procurement systems.

Performance

At the beginning of 2023, we were made aware of an issue on a project with a contractor's use of overseas recruitment agents. We worked with the contractor to ensure that they fully understood our policies, standards and ways of working and to establish full compliance.

Further steps to be taken and ongoing monitoring

During 2024, we continue to review, monitor and evaluate the measures we take and their effectiveness in preventing modern slavery and human trafficking in our operations and supply chain.

This includes:

- monitoring bids and projects in those countries deemed to be at high risk of human right's concerns through our risk register and providing appropriate support to our business to prevent incidents of modern slavery and human trafficking in our operations
- continuously reviewing and improving our escalation procedures so that modern slavery and human trafficking incidents receive immediate executive leadership attention
- increasing our employees' awareness of the signs of modern slavery and human trafficking at site and the addition of key messaging for our leadership to use during their visits to site.

the introduction of our Inclusive Site Culture and Respect in the Workplace Standards which sets out the standards of behaviour we expect in the workplace to ensure everyone feels respected, supported and safe.

We will take any steps necessary and act on any findings or outcomes of any of our risk assessments or due diligence processes to ensure that any incidents of modern slavery or human trafficking are addressed immediately.

We have established a cross-functional and divisional working group 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 is reported to the Executive Committee and to our Sustainability Committee and the Board, and will be reported in future Modern Slavery and Human Trafficking statements.

Board approval

This statement was approved by the Board on 27 February 2024 and signed on its behalf by:

A handwritten signature in black ink, appearing to read 'MS', with a long horizontal stroke extending to the right.

Michael Speakman
Chief Executive Officer
Keller Group plc