



# **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 modern slavery and human trafficking statement for the financial year ended 31 December 2024.**

## **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.

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 2024, our annual Group revenue was £3.0bn. The Group employs around 10,000 people and performs over 5,500 contracts a year. The Group has three Divisions: North America, Europe and Middle East (EME), and Asia Pacific (APAC).

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 £540,000. We work across the construction spectrum. Most commonly we act as a subcontractor to a main contractor for the projects we undertake.

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 terrain and water pressure concerns in the construction of a dam to the foundations of 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](http://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
- Sustainability Policy
- Procurement Policy
- Whistleblowing Policy

The Code and the policies can be found [here](#). A list of Keller's operating subsidiary companies who are all subject to the Code and our policies can be found below in Appendix 1. Our Code and Group policies are reviewed and communicated annually across the Group.

## 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](http://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 2024, 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 throughout the organisation and our supply chain
- reviewing the Human Rights Policy which sets out Keller's required standards and communicating it throughout Keller
- embedding the 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.our activities working with the Supply Chain Sustainability School in the US, UK and Australia, an initiative providing our supply chain with free access to sustainability training and resources.
- Keller's site teams are especially vigilant to the human rights and modern slavery risks in our labour agencies. In 2024, additional due diligence and training was undertaken with employees at our sites in our Middle East business to cover the risks of unfree recruitment, work and life under duress and the impossibility of leaving an employer.

## **Performance**

There have been no incidents of modern slavery or human trafficking recorded by Keller in 2024.

## **Further steps to be taken and ongoing monitoring**

During 2025, 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 rights 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 our escalation procedures so that modern slavery and human trafficking incidents receive immediate executive leadership attention
- maintaining 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.

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.

From 2025, the working group responsible for our efforts to prevent modern slavery and human trafficking across our group reports to the Chief Sustainability Officer. Progress continues to be 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 25 February 2025 and signed on its behalf by:

A handwritten signature in black ink, appearing to be 'MS', written over a horizontal line.

**Michael Speakman**  
**Chief Executive Officer**  
**Keller Group plc**

## Appendix 1

### Keller's operating subsidiary companies

Name	Address
A.C.N. 000 120 936 Pty Ltd	Suite G01, 2–4 Lyonpark Road, Macquarie Park, NSW, 2113, Australia
A.C.N. 008 673 167 Pty Ltd	Suite G01, 2–4 Lyonpark Road, Macquarie Park, NSW, 2113, Australia
Accrete Industrial Flooring Limited	2 Kingdom Street, London, W2 6BD, United Kingdom
Accrete Limited	2 Kingdom Street, London, W2 6BD, United Kingdom
Ansah Asia Sdn Bhd	8A, Jalan Vivekananda, Off Jalan Tun Sambanthan, Brickfields, Kuala Lumpur, 50470, Malaysia
Austral Construction Pty Ltd	112–126 Hallam Valley Road, Dandenong, VIC, 3175, Australia
Austral Group Holdings Pty Ltd	112–126 Hallam Valley Road, Dandenong, VIC, 3175, Australia
Austral Investors Pty Ltd	112–126 Hallam Valley Road, Dandenong, VIC, 3175, Australia
Austral Plant Services Pty Ltd	112–126 Hallam Valley Road, Dandenong, VIC, 3175, Australia
Capital Insurance Limited	1st Floor Goldie House, 1–4 Goldie Terrace, Upper Church Street, Douglas, IM1 1EB, Isle of Man
Case Foundation Company	2405 York Road, Suite 201, Lutherville Timonium, Maryland, 21093, United States
Cyntech Construction Ltd.	Suite 2600, Three Bentall Centre, 595 Burrard Street, P.O. Box 49314, Vancouver, BC V7X 1L3
Fondedile Foundations UK Ltd	Oxford Road, Ryton-on-Dunsmore, Coventry, West Midlands, CV8 3EG, United Kingdom
Frankipile Botswana (Pty) Limited	First floor, Plot 64518, Fairgrounds Office Park, Gaborone, Botswana
Frankipile Ghana Limited	Plot LI/13/86, Bethlehem Street, Tema, Ghana
Frankipile International Projects Limited	C/O DTOS Ltd, 10th floor, Standard Chartered Tower, 19 Cybercity, Ebene, Mauritius
Frankipile Mauritius International (Seychelles) Limited	Ocean Gate House, Ground Floor, Room 12, Victoria, Mahe, Seychelles
Frankipile Swaziland (Pty) Limited	Tenant Office 204, 2nd floor, Inyatsi House, 760 Dr David Hynd Road, Trelwany Park, Manzini, Eswatini
GENCO Geotechnical Engineering Contractors Limited <sup>1</sup>	Sheraton Buildings-Plot 10, Block 1161, El Nozha, Cairo, Egypt
GEO Instruments Polska Sp. z o.o.	Lysakow Drugi nr 47, 28–300 Jedrzejew, Poland
Geo-Instruments Sarl	8 Allee des Ginkgos, Parc d'Activites du Chene, Activillage, 69673 Bron Cedex, France
GEO-Instruments, Inc.	2405 York Road, Suite 201, Lutherville Timonium, Maryland, 21093, United States
GKM Consultants Inc.	101 – 2141 rue Nobel, Sainte-Julie, Québec, J3E1Z9, Canada
Keller (M) Sdn Bhd	8A, Jalan Vivekananda, Off Jalan Tun Sambanthan, Brickfields, Kuala Lumpur, 50470, Malaysia
Keller AMEA Hub Investment L.L.C.	Unit 302, Level 103, Aresco Tower, Sheikh Zayed Road, Dubai Media City, Al Sufouh 2, Dubai, United Arab Emirates
Keller Arabia Contracting Holdings Limited	KGAF6755, 6755 Prince Sultan Bin Abdulaziz road, 3357 Ulaia District, Tabuk 47911, Kingdom of Saudi Arabia
Keller AsiaPacific Limited	72, Anson Road #11–03, Anson House, Singapore, 079911
Keller Australia Pty Limited <sup>2</sup>	Suite G01, 2–4 Lyonpark Road, Macquarie Park, NSW, 2113, Australia
Keller Canada Holdings Ltd.	Suite 2600, Three Bentall Centre, P.O. Box 49314, 595 Burrard Street, Vancouver BC, V7X 1 L3, Canada
Keller Canada Services Ltd	Suite 2600, Three Bentall Centre, P.O. Box 49314, 595 Burrard Street, Vancouver BC, V7X 1 L3, Canada
Keller Central Asia LLP	Aiteke Bi Street 55, Atyrau City, 060011, Kazakhstan
Keller Cimentaciones Chile, SpA	Avenida De Apoquindo 3885, piso 18 la Comuna de las Condes, Santiago, Chile
Keller Cimentaciones de Latinoamerica SA de CV	Av. Presidente Masaryk 101, Int. 402, Bosque de Chapultepec I Seccion Delegacion Miguel Hidalgo, 11580 CDMX, Mexico
Keller Cimentaciones, S.L.U.	Calle de la Argentina, 15, 28806 Alcalá de Henares, Madrid, Spain
Keller Company Limited	PO Box 718, Dammam, 31421, Saudi Arabia
Keller Drilling, Inc.	330 North Brand Blvd., Suite 700, Glendale, California, United States
Keller Egypt LLC	Sheraton Buildings, Plot 10, Block 1161, El Nozha, Cairo, Egypt

Name	Address
Keller Engineering Inc.	7550 Teague Road, Suite 300, Hanover, 21076, United States
Keller Finance Australia Limited	2 Kingdom Street, London, W2 6BD, United Kingdom
Keller Finance Limited	2 Kingdom Street, London, W2 6BD, United Kingdom
Keller Financial Services Sp. Zo. o.	ul. Przyokopowa 31, Warsaw, 01-208, Poland
Keller Fondations Speciales SAS	2 rue Denis Papin, 67120, Duttlenheim, France
Keller Fondations Speciales SPA <sup>3</sup>	No. 35, Route de Khmiss El Khechna, Sbâat, 16012 Rouiba, w. Alger, Algeria
Keller Fondazioni S.r.l	Via Isarco 1, Varna, I-39040, Italy
Keller Foundations (S E Asia) Pte Ltd	18 Boon Lay Way, #04-104, Tradehub 21, 609966, Singapore
Keller Foundations Contracting LLC	2503, Palace Towers T1, Dubai Silicon Oasis, United Arab Emirates
Keller Foundations Ltd.	Suite 2600, Three Bentall Centre, P.O. Box 49314, 595 Burrard Street, Vancouver BC, V7X 1 L3, Canada
Keller Foundations Vietnam Company Limited	24 Dang Thai Mai Street, Ward 7, Phu Nhuan District, Ho Chi Minh City, Vietnam
Keller Funderingstechnieken B.V.	Europalaan 16, 2408 BG, Alphen aan den Rijn, Netherlands
Keller Funderingstechnieken Belgie BV	17A, Ringlaan, 2960, Brecht, Belgium
Keller Geotechnics (Mauritius) Ltd	Geoffrey Road, Bambous, Mauritius
Keller Geotechnics Namibia (Pty) Limited	2nd floor, LA Chambers, Ausspann Plaza, Dr Agostinho Neto Road, Windhoek, Namibia
Keller Geotechnics Tanzania Ltd <sup>4</sup>	1127 Amverton Tower, Chole Road, Dar es Salaam, Tanzania
Keller Geotehnica Srl	Bucuresti Sectorul 1, Str., Uruguay, Nr. 27, Etaj 1, Ap. 2, 011444 Bucuresti, Romania
Keller Geoteknikk AS	Hovfaret 13, Oslo, 0275, Norway
Keller Ground Engineering Bangladesh Limited	661/3 Ashkona Bazar, Hazi Camp, Dhakinkhan, Dhaka-1230, Bangladesh, Dhaka, Bangladesh
Keller Ground Engineering India Private Limited	7th Floor, Eastern Wing, Centennial Square 6A, Dr Ambedkar Road, Kodambakkam, Chennai, 600024, India
Keller Ground Engineering LLC <sup>5</sup>	Office # 14, Building # 700 Boushar Street 51, Oman
Keller Grundbau Ges.m.b.H.	Guglgasse 15, BT4a/3.OG, Vienna, 1110, Austria
Keller Grundbau GmbH	Kaiserleistraße 8, Offenbach am Main, 63067, Germany
Keller Grundlagning AB	Östra Lindomev 50, 437 34, Lindome, Sweden
Keller Holding GmbH	Kaiserleistraße 8, Offenbach am Main, 63067, Germany
Keller Holdings Limited	2 Kingdom Street, London, W2 6BD, United Kingdom
Keller Holdings, Inc.	The Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware, 19801, United States
Keller Industrial, Inc.	820 Bear Tavern Road, West Trenton, New Jersey, 08628, United States
Keller Investments LLP	2 Kingdom Street, London, W2 6BD, United Kingdom
Keller Limited	Oxford Road, Ryton-on-Dunsmore, Coventry, West Midlands, CV8 3EG, United Kingdom
Keller Management Services, LLC	The Corporation Trust Company, 1209 Orange Street, Wilmington, DE, 19801, United States
Keller Mélyépitő Koriátolt Felelősségű Társaság	1124 Budapest, Csörsz utca 41. 6. em., Hungary
Keller Mocambique, Limitada	Bairro da Matola D, Estrada Nacional N4, Avenida Samora Machel nr. 393, Matola, Mozambique
Keller New Zealand Limited	C/-GazeBurt, 1 Nelson Street, Auckland, 1010, New Zealand
Keller North America, Inc.	The Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware, 19801, United States
Keller Polska Sp. z o.o.	ul. Poznanska172, Ozarow Mazowiecki, PL-05850, Poland
Keller Pty Ltd	Suite G01, 2-4 Lyonpark Road, Macquarie Park, NSW, 2113, Australia
Keller Puerto Rico, LLC	The Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware, 19801, United States
Keller Qatar L.L.C <sup>6</sup>	Office No 273 Al Jazeera Complex-B Satwa Road, Wholesale Market, Doha, Qatar
Keller Regional Headquarters Co.	5245, King Khaled Street, PO Box 8113, Muhammed Ibn Saud, Dammam, Saudi Arabia



Name	Address
Keller speciálne zakladani spol. s r.o.	Na Pankraci 1618/30, 14000 Praha 4, Czech Republic
Keller specialne zakladanie spol.s.r.o.	Galvaniho 15/A, Bratislava, 82701, Slovakia
Keller Ukraine LLC	30, Vasylkivska Street, Kiev, 03022, Ukraine
Keller US Finance Limited	2 Kingdom Street, London, W2 6BD, United Kingdom
Keller West Africa S.A.	BP 1238 Abidjan-Marcory, Zone 4C, Rue Clement Ader, Côte d'Ivoire
Keller-MTS AG	Allmendstrasse 5, Regensdorf, 8105, Switzerland
KFS Finland Oy <sup>7</sup>	Haarakaari 42, TUUSULA, 04360, Finland
KGS Keller Gerate & Service GmbH	Kaiserleistraße 8, Offenbach am Main, 63067, Germany
Makers Holdings Limited	2 Kingdom Street, London, W2 6BD, United Kingdom
Makers Management Services Limited	2 Kingdom Street, London, W2 6BD, United Kingdom
Makers Services Limited	2 Kingdom Street, London, W2 6BD, United Kingdom
Makers UK Limited	2 Kingdom Street, London, W2 6BD, United Kingdom
Moretrench Industrial Inc.	820, Bear Tavern Road, West Trenton, New Jersey, 08628, United States
North American Foundation Engineering Inc.	5393 Steels Ave West, Milton, Ontario, LPT 2Z1, Canada
PHI Group Limited	Oxford Road, Ryton-on-Dunsmore, Coventry, West Midlands, CV8 3EG, United Kingdom
Piling Contractors Pty Limited	Suite G01, 2-4 Lyonpark Road, Macquarie Park, NSW, 2113, Australia
PT. Keller Ground Indonesia <sup>8</sup>	Gedung Graha Kencana Lantai 7 Unit B-I, Jalan Raya Perjuangan No. 88, Kebon Jeruk, Jakarta Barat, 11530, Indonesia
Recon Europe Holding, LLC	251 Little Falls Drive, Wilmington, Delaware, 19808 United States
Recon GP, LLC	251 Little Falls Drive, Wilmington, Delaware, 19808 United States
Recon Holdings II, Inc.	251 Little Falls Drive, Wilmington, Delaware, 19808 United States
Recon Holdings III, Inc	251 Little Falls Drive, Wilmington, Delaware, 19808 United States
Recon Services Inc. (Canada)	199 Bay Street, 5300 Commerce Court West, Toronto, ON M5L 1B9 Canada
Recon Services, Inc.	251 Little Falls Drive, Wilmington, Delaware, 19808, United States
Remedial Construction Services, L.P	211 E. 7th Street, Suite 620, Austin, Texas, 78701, United States
Resource Piling (M) Sdn. Bhd.	8A, Jalan Vivekananda, Off Jalan Tun Sambanthan, Brickfields, Kuala Lumpur, 50470, Malaysia
Suncoast Post-Tension, Ltd.	The Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware, 19801, United States
Waterway Constructions Group Pty Limited	112-126 Hallam Valley Road, Dandenong, VIC, 3175, Australia
Waterway Constructions Pty Ltd	112-126 Hallam Valley Road, Dandenong, VIC, 3175, Australia

1 100% owned by two trustees.

2 Share capital consists of 99% ordinary shares. The remaining 1% consists of ordinary A, ordinary B and ordinary C shares.

3 51% owned by Keller Fondations Speciales SAS, <1% owned by Keller Grundbau GmbH, Keller Holding GmbH and Keller Holdings Limited respectively.

4 > 99% owned by Keller Holdings Limited.

5 70% owned by Keller Holdings Limited.

6 49% owned by Keller Holdings Limited.

7 50% owned by Keller Holdings Limited.

8 Share capital consists of 56% Class A shares and 44% Class B shares. Keller Foundations (SE Asia) Pte Limited owns 100% of the Class A shares and 25% of the Class B shares.