



# **Modern Slavery and Human Trafficking Statement**

# This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and to the Australia Modern Slavery Act 2018 and constitutes our modern slavery and human trafficking statement for the financial year ended 31 December 2025.

## Introduction

At Keller, we require all of our directors, officers and employees, and those working for us or on our behalf, to comply with the law and act ethically and with integrity at all times. This is reflected in Keller's Code of Business Conduct and Supply Chain 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 seek to ensure that modern slavery and human trafficking are not taking place in its business or supply chain.

This statement is made by Keller Group plc (incorporated in the United Kingdom) and its subsidiaries Keller Limited in the United Kingdom and Keller Australia Pty Limited in Australia (the latter on its own behalf and on behalf of Keller Pty Limited and Austral Construction Pty Limited, also in Australia, each of whom is a reporting entity under Australia's Modern Slavery Act 2018 (together, the **Australian Reporting Entities**))<sup>1</sup>. Keller Pty Limited and Austral Construction Pty Limited are the main operating Australian Reporting Entities and are located in Sydney and Perth, respectively, but conduct operations throughout Australia.

The Sustainability Committee of the Keller Group plc Board (the **Board**) is responsible for assisting the Board in fulfilling its oversight responsibilities in relation to sustainability matters arising out of the activities of the Keller Group of companies (the **Group**). Its role includes monitoring the implementation and compliance with this Modern Slavery and Human Trafficking Statement.

## Our business and organisational structure

We are the world's largest geotechnical specialist contractor. For the year ended 31 December 2025, our annual Group revenue was £3bn. The Group employs around 10,000 people and performs around 5,500 contracts a year. The Group has three Divisions:

- North America;
- Europe and Middle East (**EME**), which is the Division in which Keller Limited operates; and
- Asia Pacific (**APAC**), which is the Division in which Australian Reporting Entities operate.

At its simplest, we get ground ready to build on, providing solutions to geotechnical challenges across the entire construction sector. We have the people, expertise, experience and financial stability to respond quickly and see projects through safely and successfully.

Our strategy is to be the preferred international geotechnical and specialist construction contractor focused on enduring markets and attractive projects, maximising long-term value for our stakeholders.

While 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. Our projects are often for a short duration and have an average value of around £560,000. Most commonly we act as a subcontractor to a main contractor for the projects we undertake.

### *Operations*

- We are a geotechnical and specialist construction contractor. We get the ground ready for construction of any type of structure.
- We have an extensive branch network operated by local teams that have deep knowledge of their local markets and ground conditions.
- Our local engineering teams have access to Keller's global network of engineers for product support and best practice knowledge.
- We offer a market-leading range of geotechnical and specialist construction products/techniques. These are used in solutions for deep foundations, ground improvement, grouting, earth retention,

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<sup>1</sup> The ACN numbers for the Australian Reporting Entities are as follows: Keller Australia Pty Limited (ACN 081 279 932), Keller Pty Limited (ACN 609 867 889) and Austral Construction Pty Limited (ACN 075 340 724).

- marine, post-tension systems and industrial services.
- We maintain, invest in and manufacture specialist equipment. Our local branches have their own offices and equipment yards. Our equipment yards are used to optimise, service and store our equipment and tools that are used in construction projects.
- Our strong balance sheet and cash generation allow us to maintain key resources through the market cycle and reinvest for growth.

### *Supply chain*

- We rely on our supply chain to source quality materials, goods and services for our projects. Our most common materials include concrete, cement, steel and aggregate.
- Materials are typically sourced locally by our branches including, for example, in the UK and the Australian Reporting Entities. This means that our supply chains are generally short and agile, enabling more efficient project delivery.
- We rely on external manufacturers for the supply of machinery and equipment that we use to deliver our projects.
- We also manufacture specialist rigs and tools in-house that we believe gives us a competitive advantage in particular products.

## **Our policies**

The policies described below are available on our website, along with other policies referred to in our Code of Business Conduct (our **Code**), and can be found on our website [here](#). Our Code and Group policies apply to all entities within the Group including the Australian Reporting Entities. Our Code and Group policies are reviewed regularly, particularly where legislation has been updated or the Group's internal procedures have changed. These are then communicated both internally across the Group, and to our business partners as appropriate.

### **Code of Business Conduct**

Our Code of Business Conduct sets out the minimum expectations for all of our people 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 key commitments, which are elaborated in more detail in our group policies. Beyond the law, our key commitments and our policies we are guided by Keller's values: Safety. People. Integrity. Excellence.

Our Code applies to all legal entities which Keller Group plc wholly owns, has a majority stake in, or has overall operational control of, worldwide. Our Code applies to all persons working for us or any Keller Group company, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns and individual temporary or fixed-term contractors, wherever they are located worldwide.

The Code specifically states that we support every individual's human rights and refuse the use of illegal child labour, forced labour, human trafficking and modern slavery under any circumstances. It also states that we want to work with suppliers who understand us, comply with the law, act with integrity and adhere to our key commitments and Supply Chain Code of Conduct.

### **Supply Chain Code of Business Conduct**

Our Supply Chain Code of Business Conduct provides that we expect our suppliers to operate and procure that their suppliers operate in accordance with the principles in our Supply Chain Code of Business Conduct and in full compliance with all applicable laws and regulations. It contains a dedicated section on human rights and labour standards. It also states that the Group has reserved the right to assess and monitor suppliers' compliance with our Code of Business Conduct and Supply Chain Code of Business Conduct.

### **Human Rights Policy**

Our Human Rights Policy provides that the Group is fully committed to respecting human rights in accordance with our core values. It also set out our expectations of our suppliers, sub-contractors and other business partners, as well as our key human rights priority areas.

## Whistleblowing Policy

Our Whistleblowing Policy encourages employees and others to raise concerns. It sets out details of our internal reporting channels and our external independent whistleblowing channels which are available 24/7 and allow employees and third parties to raise concerns via telephone, email or online in a large range of languages.

## 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 modern slavery in our supply chains. We also recognise that the construction sector has been identified as a sector with inherent risks of modern slavery. We expect the Group's supply chains to respect the human rights of their employees and contractors and treat them fairly, in accordance with all applicable laws. Keller's site teams are especially vigilant to the human rights and modern slavery risks in our labour agencies.

In line with our Group policies, we expect supply chain companies to:

- 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;
- 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);
- ensure that all workers are treated equally and with respect and dignity without any form of discrimination;
- 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;
- 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;
- ensure that all workers operate in a safe and healthy working environment; and
- ensure that all workers have access to grievance mechanisms with fair procedures and remedies.

We expect all supply chain companies to 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 the following processes and initiatives in place to: (a) encourage supplier and worker engagement and collaboration; and (b) develop and implement actions, programmes, initiatives and processes to prevent modern slavery:

- Each person in scope of our Group Code of Business Conduct has a responsibility to read and comply with it. It was launched throughout our business through a communications and training programme that started in December 2016 and has been refreshed periodically.
- Most recently, in December 2025, the Board approved an updated version of the Code. This was communicated worldwide throughout the Keller Group in January 2026.
- Ethics and compliance training is carried out across the Group annually and this covers modern slavery and human rights. It seeks to enable our employees to have the tools to identify potential compliance concerns, including in respect of human rights impacts. It also encourages employees to raise questions or concerns and informs them who to seek advice from where required.

- Our Code of Business Conduct training will be refreshed and relaunched during 2026, to reflect the updated Code.
- The Group training programme is supplemented through additional training at a local level. For example, in Keller's UK business, modern slavery training is provided to all new employees and onsite.
- During 2025, Keller continued to make our external independent whistleblowing channels known to our teams locally and onsite.
- During 2025, Keller rolled out a new Escalation Protocol, to enable fast mobilisation in the event of an incident. Our Ethics and Compliance Officers, Legal, Human Resources and the Executive Committee teams have all been notified accordingly. Keller will then act appropriately if any allegations of actual or suspected non-compliance are raised.
- We participate in the Supply Chain Sustainability School (the **School**). This is a construction-specific resource for us and our supply chain. Keller's local business is a founding partner in North America and equivalent entities are members in the UK and Australia. The School provides toolbox talks, online training and webinars on a range of topics. These videos and toolbox talks are used by Keller as an engaging way to train its workforce on modern slavery. Keller's supply chain can also access these materials for free.
- Our internal audit team conduct periodic monitoring of compliance with our policies.

### Assessing effectiveness and further steps to be taken

The Group, including the Australian Reporting Entities, recognizes the importance of evaluating the effectiveness of actions taken to combat modern slavery during each reporting period. We will continue to review, monitor and embed our processes in 2026 by undertaking the following:

- All employees will continue to be expected to comply with our Code of Business Conduct.
- We will continue to maintain our employees' awareness of the signs of modern slavery and human trafficking at site.
- All suppliers will continue to be expected to comply with our Supply Chain Code of Business Conduct.
- We will continue to monitor our reporting channels for any concerns raised relating to adverse human rights impacts, including modern slavery. We remain committed to reacting promptly and appropriately if allegations of actual or suspected non-compliance are raised.
- We will continue to provide appropriate training to our employees, and direct suppliers to the training materials provided by the School, as set out above. As mentioned above, our internal training programme on the Code will be refreshed during 2026.
- Keller's internal audit team will continue to conduct periodic monitoring and flag adverse findings.
- During 2026, Keller will conduct risk assessment workshops in order to refresh our assessment of potential modern slavery and human trafficking risks in our organisation and supply chain. The outputs of those workshops will be used to improve our processes.

### Performance

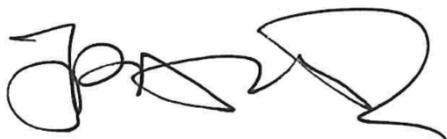
There have been no incidents of modern slavery or human trafficking recorded by the Group in 2025.

### Consultation

This statement was prepared in consultation with key stakeholders in the operating entities in the UK and Australia who are in scope of the reporting obligations under the relevant local legislation. Keller Australia Pty Limited has consulted with the operating companies that it owns or controls in the development of this statement.

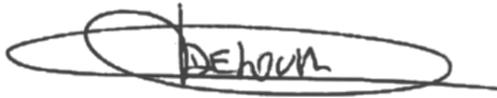
### Board approval

This statement was approved by the Board of Keller Group plc on 2 March 2026.



**James Wroath**  
**Chief Executive Officer**  
**Keller Group plc**

This statement was approved by the Board of Keller Limited on 3 March 2026.

A handwritten signature in black ink, appearing to read 'DEHOUN', enclosed within a hand-drawn oval shape.

**David De Sousa Neto**

**Director**

**Keller Limited**

This statement was approved by the Board of Keller Australia Pty Ltd on 4 March 2026 on its behalf and, in accordance with section 14(2)(d)(ii) of the Australian *Modern Slavery Act 2018 (Cth)*, on behalf of the other Australian Reporting Entities who are all subsidiaries of Keller Australia Pty Ltd. The statement is signed by Andrew Carnie in his role as a director of Keller Australia Pty Ltd.

A handwritten signature in black ink, appearing to read 'Andrew Carnie', written in a cursive style.

**Andrew Carnie**

**Director**

**Keller Australia Pty Limited**