Whistleblowing

Policy

Introduction

Our Code of Business Conduct reflects our values of Safety, People, Excellence and Integrity. It sets out our minimum expectations for all of our people, wherever we are based and whichever Keller business we work for, including our nine key commitments. Our commitments are there to protect us and create an environment in which fairness, integrity and respect are common standards.

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 commitments 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 Keller. It can take courage to speak up for what is right. We want everyone to know that we encourage everyone to find that courage and that we stand behind those who do so.

Scope and responsibilities

This policy applies to all legal entities which Keller Group plc wholly owns, has a majority stake in or otherwise has control of worldwide. It applies to anyone working for Keller, including employees at all levels, directors, officers, contractors, temporary staff, agency workers, seconded workers, volunteers, interns and other workers, wherever they are located.

In addition, any third parties doing business for or on behalf of Keller Group, such as suppliers, contractors, subcontractors or other business partners, as well as clients are encouraged to raise any concerns within the scope of this policy.

This policy does not form part of any employee's employment contract and we may amend it at any time.

Policy objectives

As a company, Keller supports all those who defend our principles and does not tolerate any retaliation against them. All we ask is that your concern is genuine. We treat all concerns seriously, conducting investigations where necessary and taking appropriate actions. Engaging in illegal activities or undermining our principles may result in corrective actions or, in the case of employees, disciplinary action up to and including dismissal.

As an employee, or as someone working on Keller's premises, you may see or suspect misconduct. This policy is to guide you on what to do if you discover misconduct at work and provide a clear internal process for people to report their concerns. It should help you to report your concerns to a person who can investigate if necessary and deal with them independently and promptly.

By way of guidance, misconduct at work refers to any suspected or actual wrongdoing relating to the Keller Group, including but not limited to fraud, bribery, facilitation of tax evasion, any criminal offence, breach of the law, miscarriage of justice, danger to the health and safety of any individual, modern slavery, damage to the environment, sexual harassment, any deliberate breach of our Code of Business Conduct or other Keller policies, or deliberate concealment of the aforementioned.

The reporting channels referred to in this policy are not meant for general operational issues or for complaints relating to your own personal circumstances. These should be raised in the normal way with your line manager or relevant point of contact at Keller, or via any applicable grievance policy.

Reporting a concern at work

If you have a genuine concern that you wish to report, try to speak up at the earliest opportunity, ideally to your line manager or relevant point of contact at Keller. If you are uncomfortable with this, or you prefer to talk to someone else, then you can contact your local Ethics and Compliance Officer or a member of your local HR or Legal teams. If you are unsure of the contact details for your local Ethics and Compliance Officer, please contact your local HR manager.

If you don't feel comfortable talking to anyone within Keller, you can use a confidential reporting line operated by Safecall, a completely independent company that specialises in handling concerns at work.

The reporting line is available 24 hours a day, seven days a week and your query can be supported in many different languages. Safecall can be contacted in the following ways:

- **By telephone** - A list of telephone numbers can be found at https://www.safecall.co.uk/en/file-a-report/telephone-numbers/ and in our Code of Business Conduct
- **Online** - You can file a report via their website at https://www.safecall.co.uk/en/file-a-report/

They'll take details of your concern and send a report to Keller.

We hope that you feel able to voice your concern openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity confidential. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously, although we will still make every effort to investigate anonymous disclosures. You should be aware that investigation may be more difficult, or even impossible, if we cannot obtain further information from you to substantiate concerns.

However you choose to report your concern, please provide as much detail as possible to facilitate any investigation process. We encourage you to provide your contact details, so that we can clarify reports made or request further information where required.

You will not be dismissed or disadvantaged as a result of reporting any genuine and reasonably held concern about misconduct at work. However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary or corrective action.

Retaliation against you for raising a genuine concern under this policy will not be tolerated and will be dealt with in an appropriate manner, which may include disciplinary action in the case of employees.

Further methods of reporting

In addition to the reporting options outlined above, employees and other eligible persons within a member state of the European Union (EU) may also report concerns through the local internal reporting channels established in accordance with the EU Whistleblowing Directive (Directive (EU) 2019/1937), where applicable. These channels are designed to ensure confidentiality, protection against retaliation, and compliance with local legal requirements. Please contact the Ethics & Compliance Officers for the Keller Group Business Units in the EU for details of those local internal reporting channels and protections.

Where applicable, Keller applies local law on the reporting of concerns at work.

Governance

The Audit and Risk Committee of the Keller Group plc Board provides oversight of this policy.

This policy has been approved by the Board of Keller Group plc.

Supporting information

- Code of Business Conduct
- Supply Chain Code of Business Conduct

Document change history

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