



Modern Slavery Statement 2023



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This statement has been published in accordance with section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Kier Group plc and its subsidiary companies during the year ending 30 June 2023 to prevent modern slavery and human trafficking in our business and supply chain. It has been reviewed and approved by the Kier Group plc board and signed by Andrew Davies, Chief Executive, on 6 December 2023.

A message from our chief executive

At Kier, doing the right thing is and will continue to be a core principle in the way we operate our business; our Code of Conduct has been built around that principle. The health and safety of our workforce is paramount; the wellbeing of our people is an extension of that.

We have undertaken a number of initiatives this year to focus on the wellbeing of our people. At the heart of that, we launched a culture programme in recognition of the current environment, our place within it and the challenges that are faced by so many people who work with us. People engagement is central to that; we have introduced a campaign that ensures our people feel supported in their roles and their day-to-day lives and are empowered to call things out that aren't right.

We recognise it has been a challenging time with global events and pressures arising from the cost of living. Workers may be more vulnerable to exploitation with the increased pressures, and the risk perpetuates further in an industry that operates a transient workforce and multi-layered supply chain.

The increased industry risk reinforces our view that we must collaborate to tackle the issue of modern slavery. We have made progress in enhancing our approach and we recognise there's more we can do both from an organisation and industry perspective to respond to the evolving risk. We continue to support our efforts to develop our programme further and ensure we do the right thing for all our workforce.



Andrew Davies,
Chief Executive Officer

Introduction

Kier is a leading UK infrastructure services, construction and property group.

Our purpose is to sustainably deliver infrastructure which is vital to the UK, and we are committed to leaving lasting legacies through our work.

We provide specialist design and build capabilities and the knowledge, skills and intellectual capital of our people to ensure we are able to project manage and integrate all aspects of a project.

c.10,000
employees

c.400
live projects across the UK

c.69%
of subcontract spend
with SMEs

£487k
donated to youth
homelessness charities



You can find a full description of our business and the services we offer in our [2023 Annual Report and Accounts](#).

Our structure

Kier is made up of four business divisions, that work alongside our central Group services function – Transportation; Natural Resources, Nuclear & Networks; Construction; and Property.



Transportation



Leading provider of sustainable transport infrastructure solutions designing, building and maintaining infrastructure for the highways, rail, aviation and ports sectors.



Natural Resources, Nuclear & Networks



Delivers long-term contracts providing repairs, maintenance and supporting capital projects to the water, nuclear, energy and telecommunications sectors.



Construction



Delivers public and private sector projects around the UK, across multiple sectors including education, healthcare, custodial and defence. Construction is comprised of our Regional Building, Strategic Projects, Kier Places and International businesses.



Property



Invests and develops sites across the UK primarily through mixed-use commercial and residential development, specialising in urban regeneration, last mile logistics and modern, sustainable office developments.

Our policies, frameworks and strategies

We have a number of policies which are designed to manage the risks relating to modern slavery and human trafficking within our businesses. These are built into our everyday processes, to help us uphold the rights of all those who work for and with us, be it directly or within our supply chain. We are committed to acting ethically and with integrity and to working together with our supply chain to address modern slavery and human trafficking.

Summaries of the key policies, frameworks and strategies follow:

Code of conduct

Kier's Code of Conduct sets out the standards of behaviour and business conduct expected from all Kier employees. These standards, underpinned by the principle of doing the right thing, are expected to be adopted by all individuals when they perform their day-to-day duties either as Kier employees or on behalf of Kier. The Code applies everywhere that we operate, regardless of any local laws or local business practices that may permit a lower standard of behaviour.



Contributions made to two freely available toolkits - the BSA's [Tackling Modern Slavery Toolkit](#) and Action Sustainability's [Addressing Modern Slavery and Labour Exploitation in Solar PV Supply Chains Procurement Guidance](#)



Operating Framework

Our Operating Framework sets out the structure within which the Kier Group operates and provides clarity on key roles and responsibilities within our organisation. This, alongside our Code of Conduct, guides the compliance and behaviours expected from all those who work for Kier and sets out how we do business across the Group.

Building for a Sustainable World Framework

Kier's purpose is to sustainably deliver infrastructure which is vital to the UK. Our sustainability framework 'Building for a Sustainable World', looks beyond the 'green' and focuses on building on the good work that we have undertaken in both environmental protection and creating social value in the communities we work in. It focuses on three main pillars where we believe we can make the biggest difference - Our People, Our Places and Our Planet. Each pillar includes several topics that are aligned to the priorities of our people and stakeholders, with each topic having clearly defined non-financial measures that have been chosen to help demonstrate impact and continuous improvement. Our people pillar seeks to ensure fair treatment for our entire workforce.

Anti-slavery and human trafficking policy

All Kier employees and Kier's supply chain are required to follow the systems and controls that are designed to ensure that modern slavery has no place in our business. To enable Kier to meet our anti-slavery and human trafficking commitments, we require our employees and those who work on our behalf to understand the forms and indicators of modern slavery ensuring we do all we can to mitigate the risk of modern slavery in our business.



Whistleblowing policy

As a business, Kier expects the highest standards of conduct and business integrity from every colleague, however we know that from time-to-time things can go wrong. When these situations occur, we want our people to feel empowered to speak up and report any suspected wrongdoing, or breaches of law or policy, so that the issues can be appropriately addressed. Reports can be made anonymously through an independent whistleblowing provider, and all concerns raised are investigated and escalated as appropriate. We do not tolerate any form of retaliation against an individual who speaks up and attempts to do the right thing.

Strategy for responsible procurement

Our responsible procurement ethos is a fundamental part of Kier's strategy for a sustainable business. We have set standards for ethical and responsible procurement to provide lower impact products and services. We are committed to working with supply chain partners who share our standards and support our objectives to achieving this strategy. We have identified categories of products which we believe pose the greatest risk for undesirable social and environmental impacts and have employed a risk-based approach to ensure that we focus on the areas with the greatest potential impact.

Real Living Wage policy

As an accredited Real Living Wage (RLW) employer, Kier is committed to ensuring all eligible employees, working directly or indirectly, will be paid the RLW and ensuring our employees earn a wage that goes above and beyond the government minimum. We want everyone within Kier to have the same opportunities and are committed to implementing the RLW for all our supply chain, contingent workforce and contractors.



Due diligence

Our due diligence processes enable us to monitor compliance with our policies and frameworks and help us to identify modern slavery and human trafficking risks so that we can respond and action change. These processes ensure that due diligence is an ongoing activity that is addressed throughout our relationship with our people and supply chain. Our supply chain partners are required to comply with all applicable laws and our policies and are required to pre-qualify to work with us.

Onboarding processes

We have rolled out enhanced labour onboarding processes across a number of our sites through our new workforce management system. The system will continue to be implemented on our new projects and enables a standardised process, ensuring that key messages are delivered, including modern slavery indicators and the mechanism for raising a concern. Workers on our sites are also required to complete a registration process before entering our sites which further reduce the risk. As the system is rolled out more widely on our sites, and each worker is assessed, the metrics derived from the system will help us to consider future areas of focus and improvements.

35 sites using Biosite, our new workforce management system.



Employee engagement

We know that our people are our most important asset and they are vital in helping us to identify and address the risks of modern slavery. We aim to equip our people with the knowledge and tools they need through awareness campaigns and access to regular training. Our 'Your Kier' mobile application delivers company updates to all our employees ensuring every employee is engaged in company developments. The app, which is also available to use by members of our supply chain, enables delivery of important messages, including ways to raise concerns. Worker wellbeing initiatives have been rolled out across the business and periodic 'Your Voice' surveys are carried out to measure employee engagement and as a way of obtaining feedback. In line with our culture programme, we have appointed culture champions to help permeate our culture across the business.

Procurement checks

As part of our procurement processes we have integrated modern slavery due diligence throughout the lifecycle of our contracts. This includes a pre-qualification questionnaire to assess suppliers' processes and policies, visiting supplier premises to complete a Supplier Premises Inspection form which enables a visual audit, and we continue to raise human rights topics in our supplier review meetings with our preferred suppliers.



Contractual

Our contract terms with our supply chain require that they comply with our policies, implement due diligence for their suppliers and ensure their employees are appropriately trained. Our policies are all stored and kept up to date in a central, Kier managed location easily accessible by our supply chain. Our contractual provisions also enable us to carry out audits of our supply chain.

Ethical audits

We require our suppliers and sub-contractors to ensure that there is no human slavery or human trafficking in their own supply chains. By undertaking ethical audits within our supply chain, we can help to identify issues that we can work together to resolve.

Nine focused audits undertaken, concentrating on areas of highest concern - including right to work checks, real living wage and workers receiving written terms and conditions.



Assessing and managing risks

Construction remains a high-risk sector, particularly due to the nature and profile of the businesses that operate within it. The sector operates with complex supply chains and a significant transient workforce. The macro environment, particularly the shortage of skills and materials and, by extension, increased costs and challenges with procurement, raises further risks that we must navigate from a modern slavery perspective. The risk profile is elevated further through conflicts and climate change.

These challenges are complex and we have taken steps to identify and address them, including completion of a risk assessment to identify risk profiles of the materials, products and labour we procure. We commissioned an external assessment to evolve and refine our sustainability framework.

The assessment gathered insights from our stakeholders to help draw out areas of focus and industry practice. This has helped to inform our priorities to manage modern slavery risk.

The review highlighted areas for improvement including further training and reframing the topic of labour exploitation so it is received by the business in a more impactful manner.

We continually look for ways to improve our internal processes, which we regularly review.

Two group-wide risk assessments completed.



Governance

Overall accountability for the Modern Slavery statement is held by the board of directors. The structure of our business is governed by the Operating Framework which is designed to empower and create accountability in the business for its performance. The Framework requires that the Group Managing Director in each division provides assurance regarding compliance in their respective businesses.

Supplementary to our overall governance structure, our Ethical Labour working group operates as part of our sustainability framework and is governed by its leadership team and the ESG committee. It includes representatives from each of the accountable businesses and meets to develop and implement solutions that are tailored to the day-to-day operations of our businesses.

Internal processes

All new joiners complete a robust onboarding process, including checks to ensure that they are eligible to work in the relevant country of employment.

We deliver training to all employees, both on induction and periodically thereafter, so that they are aware of the issues of modern slavery and human trafficking and feel empowered to take the necessary steps to help prevent it. We have also helped to develop and implement industry-wide training through the Supply Chain Sustainability School.



Training and awareness

Our people, and our supply chain, play a critical role in identifying and preventing modern slavery on our sites and in our wider supply chain. Modern slavery awareness training is provided to all staff as part of the mandatory training they must complete as employees of Kier and is refreshed regularly. This training may be delivered online, during a new starters site induction or through a toolbox talk and is tailored to best meet the needs of our people depending on their role and working environment.

All Kier employees have access to training through the Supply Chain Sustainability School, alongside Lunch and Learns that are held internally.

We are also planning to launch a new learning management system which will provide us with enhanced metrics to monitor training compliance and allow us to better target additional support when it is required by certain teams or regions.

Over 3,000 colleagues completed modern slavery training during FY23 as part of our continuous cycle of learning.



Achievements and next steps

In our Financial Year 2023 we have focussed our attention on building the necessary governance to drive change within our businesses, and improving awareness of modern slavery so that our people are aware of the risks and how they can help to mitigate these.

We contribute to four external collaborative Modern Slavery Working Groups.





Target

Robust governance structure, with direct line of sight to executive committee to ensure long lasting decisions are made.

Enhanced awareness of modern slavery amongst our people, including signs to look out for and actions we can all take to help mitigate the risk.

Improved supply chain risk assessment and mitigation, to help develop processes and drive compliance.

Integrated workforce management system across sites to ensure that all appropriate right to work checks have been completed and to provide data on our workforce demographic.



Achievement

Ethical labour working group created in January 2023, sponsored by group legal and compliance director, health, safety, wellbeing and sustainability director, group procurement director and chief people officer.

This working group is responsible for the development and ongoing assessment of our KPIs to ensure we are continuously improving.

Provided updated Modern Slavery training for all of our people, including information on the universal SOS hand signal.

Work is ongoing to raise awareness in ways that better reflect the demographic of our workforce, including the ability to make reports in different languages.

We have worked in collaboration with Action Sustainability on their Solar PV Procurement toolkit, and also with the Business Services Association on their modern slavery service and infrastructure toolkit. Internally we are identifying a variety of materials to help identify supply chain risk related to modern slavery, that meet the needs of our businesses and clients.

We have also developed a scope of requirements needed from third party partners to enhance our processes and audit capabilities and have measured several organisations against business needs. Continuous work with our subcontractors and their supply chain to drive compliance with our Real Living Wage policy is now implemented across our businesses.

We have launched a new workforce management system, which will continue to be rolled out across our business. Reports from this system are already being utilised for greater visibility of how our workforce is made up.

As an extension, we are exploring an additional technology based right to work solution for our indirect labour.



During the next modern slavery statement cycle, we will continue to monitor the effectiveness of our actions against modern slavery and human trafficking, with a further focus on the below targets:

- **Better utilise available technologies to ensure all relevant onboarding information is accessible to all our people, regardless of language or literacy barriers**
- **Onboard a partner for process improvement and opportunity discovery across our supply chain**
- **Explore opportunities to work with charities with a view to providing support to those affected by modern slavery**
- **Provide enhanced training for Wellbeing Champions who can extend our efforts to tackle the risk of modern slavery**
- **Include additional modern slavery questions on standard site visit checklists**
- **Launch an improved awareness campaign for onsite operatives with a focus on providing our people with increased grievance reporting mechanisms**
- **Partner with audit provider(s) to assist us to develop and carry out a programme of ethical audits across projects and the supply chains of our business divisions.**

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