

Summary / Background

Kier expects the highest standards of conduct and business integrity from every colleague. However, from time-to-time things can go wrong. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them whenever they occur. Speaking Up to disclose any form of suspected wrongdoing or unacceptable behaviour is always the right thing to do.

This policy is intended:

- to encourage colleagues to promptly report suspected wrongdoing, in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected;
- to provide colleagues with guidance as to how to raise those concerns;
- to reassure colleagues that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken; and
- to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace, including clarifying the roles and responsibilities for reporting and investigating allegations of wrongdoing.

What is the requirement?

At Kier, we expect our colleagues to speak up and report any suspected wrongdoing or breaches of the law or internal policy. When there is a reason to believe that misconduct may have occurred, we will conduct an appropriate investigation. If we determine that misconduct has occurred, then we will address it appropriately. Managers should create an environment that encourages compliance with this policy. They should encourage others to report concerns and to ask questions regarding these issues.

The Group Compliance team has day-to-day responsibility for this policy and has oversight of the effective completion of any whistleblowing investigations. Group Compliance has overall responsibility for such allegations in Kier, for deciding on any investigative actions to be taken and who will be involved in any investigation. This is necessary to ensure that the investigation is: suitably independent and objective; sufficiently thorough and focused on the correct areas of concern and carried out legally and fairly.

All colleagues are obliged to assist and fully co-operate with any investigations into alleged wrongdoing in the workplace.

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Why is it important?

Management needs to know about concerns, so compliance issues can be addressed quickly and properly. By raising concerns, you help to protect yourself, your colleagues, and the business. If you see something that raises a question or concern, you have an obligation to speak up promptly. Timeliness in reporting is essential so issues can be addressed as efficiently and effectively as possible.

Raising concerns

We realise that it can be hard to raise concerns. Generally, people don't do so for one of two reasons. First, they may fear retaliation. When you speak up and raise genuine concerns or report suspected wrongdoing, you are doing the right thing and Kier will not tolerate any retaliation against you. If you believe someone has retaliated against you or any other colleague for raising a concern, contact a member of the Group Compliance team as soon as possible. Anyone who retaliates against a person for raising a concern will face action under Kier's disciplinary procedures, which may include dismissal.

On the other hand, knowingly making false allegations will not be tolerated either. If we conclude that a person has done so, action will be taken under Kier's disciplinary procedures, which may include dismissal.

Another reason people don't raise concerns is that they fear nothing will happen. We can assure you that any time anyone raises a concern about a potential issue, we will take appropriate action to investigate and respond. We will take any necessary corrective action, including disciplinary action when appropriate, regardless of the seniority of those persons involved. In addition to confidentiality, reporters have the option to make a report anonymously although it is often helpful to have a contact point in case further information is required to help with the investigation.

What must I do / not do?

You must:

Speak Up where you have reason to suspect wrongdoing or danger at work. Examples include:

- criminal activity e.g. fraud, theft, bribery, corruption;
- failure to comply with any legal obligation or regulatory requirement;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;

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- financial fraud or mismanagement;
- negligence;
- abusing a position of authority;
- any victimisation, harassment, discrimination or act of abuse towards any employee;
- potential modern slavery;
- breach of our internal policies and procedures e.g. Conflicts of Interest, Anti Bribery and Corruption (including Gifts & Hospitality) etc.;
- conduct likely to damage our reputation;
- unauthorised disclosure of confidential information;
- the deliberate concealment of any of the above matters.

When a colleague or member of your team raises issues of the type noted above you must report that promptly to the Group Compliance team.

You must not:

- Ignore the issue;
- Delay reporting a concern – this could mean the issue gets more serious for all concerned;
- Try and tackle the issue yourself. This could have a number of unintended consequences one of which is to tip off the other party that others are aware of their activities and hamper any investigation;
- Raise concerns that you know to be untrue.

How do I speak up?

Some concerns can be addressed by speaking to the person whose conduct is the cause for concern. We understand that this is not always possible; if it is not, please speak to your line manager. If, for whatever reason, you do not feel comfortable doing this, you can contact any member of the Corporate Compliance department. Alternatively, you may prefer to use the Speak-Up helpline, which is run by an independent, external company (Safecall).

Speaking up can be a difficult thing to do, so please be assured that all information received will be treated seriously and investigated appropriately. If you act in good faith, believing your information is accurate, we will protect you even if you are mistaken.

The relevant contact information is:

Kier's Speak-up mailbox: speakup@kier.co.uk

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Safecall:

Telephone numbers to call:

If you are calling from the UK the number is 0800 915 1571.

If you are calling from the UAE the number is 8000 441 3376.

If you are calling from Saudi Arabia the number is 800 844 2067.

The line is available 24 hours a day. Calls are free of charge and can be made in complete confidence.

You can also make a report via the website: www.safecall.co.uk/report or email kier@safecall.co.uk.

For and on behalf of Kier Group plc

Andrew Davies, Chief Executive

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