

**Introduction**

Kier is a property, residential, construction and services group which operates across a wide range of sectors, including defence, education, health, highways, housing, industrial, power, property, transport and utilities, and currently employs c.20,000 people across our operations. A full description of the business and services we offer can be found in our Annual Report and Accounts at <http://www.kier.co.uk>.

As well as delivering services directly, we also act as a principal contractor and provide contracts management expertise. Approximately two-thirds of our revenue is spent on the sub-contractors and materials required to perform contracts for our clients. We have relationships with a large number of sub-contractors and, every day, a significant number of their employees will be working on our sites, in addition to our own employees. We also rely on a number of manufacturers, suppliers and distributors which, in turn, will source products from their respective supply chains.

**Our policies**

Kier has a number of policies that are designed to manage modern slavery and human trafficking issues, including our Employee Code of Conduct, Responsible Procurement Policy and Anti-slavery and Human Trafficking Policy. These set out our position of zero tolerance of modern slavery and human trafficking in any form in our business and supply chain. We are committed to acting ethically and with integrity in our business dealings and relationships and to maintaining systems and controls designed to ensure modern slavery and human trafficking are not taking place in our business or across our supply chain. Our Whistleblowing Policy provides a mechanism for our employees and others working in our supply chain to report suspected breaches of these policies.

**Our approach to assessing and managing risk**

1. We have a Group-wide policy confirming our zero tolerance of modern slavery and human trafficking.
2. Our policies require that our sub-contractors and consultants acknowledge their responsibility for adhering to our policies.
3. We have undertaken risk assessments to identify the key procurement risks categories in our supply chain and review those risk assessments regularly.
4. We have issued minimum procurement standards for materials and products against certain of the identified risk categories and we review those regularly. We issue new standards as required.
5. Our standard contractual terms include obligations on our sub-contractors and suppliers to comply with our policies, including our Anti-slavery and Human Trafficking Policy.
6. Our policies require our subcontractors and suppliers to complete an assessment to confirm that they comply with Kier's zero tolerance policy.
7. We undertake checks on new recruits to ensure that they are eligible to work in the relevant country of employment.
8. We continue to monitor the effectiveness of our actions against the risk of modern slavery and human trafficking. This includes reviewing our policies and our procurement standards and implementing an audit programme (see below).
9. We are delivering training to key employees on the risks of modern slavery and human trafficking and our processes to mitigate these.
10. We undertake audits of certain key supply chain partners to understand and validate the controls in their organisations and provide an opportunity to learn from best practice.
11. We have supported the development of industry-wide training on modern slavery that is available through the Supply Chain Sustainability School.

We are aware that risks arising from modern slavery and human trafficking can apply anywhere in our operations, whether through direct employment, sub-contracted employees or the supply of materials. We expect our suppliers and subcontractors to ensure that there is no slavery or human trafficking in their supply chain. Where issues are identified (including through our audit process) that are not resolved to our satisfaction, we review the on-going nature of the relationship with that relevant organisation.

**Next steps**

We will monitor the effectiveness of our actions against modern slavery and human trafficking. Next steps will include: continuing to develop further standards to support our Anti-slavery and Human Trafficking Policy (and related policies), keeping our pre-qualification standards for the appointment of new suppliers and subcontractors under review, ensuring relevant employees continue to receive appropriate training on identifying any potential unlawful or unethical conduct within our operations and supply chain, launching on-line training for our workforce, reviewing and considering extending our audit programme and continuing to assess the risks associated with our existing supply chain.

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This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Kier Group's modern slavery and human trafficking statement for the financial year ending 30 June 2017. It was approved by Kier's board of directors on 15 December 2017.

**Date: 15 December 2017**

**Signed by:**



**Haydn Mursell**  
**Chief Executive**  
For and on behalf of Kier Group plc

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