

OUR APPROACH TO ASSESSING AND MANAGING THE RISK OF MODERN SLAVERY AND HUMAN TRAFFICKING

Construction remains a high-risk sector particularly due to the nature and profile of the businesses that operate within it i.e. significant transient workforce and complex supply chains. 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. These challenges are complex and we have taken steps to identify and address them. We continually look for ways to improve our internal processes, which we regularly review. Some of our actions from the past year are highlighted below:

1. We have a Business-wide policy that is regularly reviewed and which confirms our 'zero tolerance' approach and commitment to protecting against modern slavery of our employees and those within our supply chain
2. We require our sub-contractors and suppliers to acknowledge their responsibility for adhering to our Code of Conduct and our policies relating to modern slavery and human trafficking
3. We undertake periodic risk assessments to identify the key modern slavery and human trafficking risks in our business and supply chain
4. We have issued standards for certain high-risk categories of materials and products. We keep these standards under review
5. Our contractual terms include obligations on our sub-contractors and suppliers to comply with our policies, including our Anti-Slavery and Human Trafficking Policy
6. We require our sub-contractors to complete an assessment that is checked by an accredited third party to verify legal compliance consistent with our 'zero tolerance' approach
7. We undertake checks on new joiners to ensure that they are eligible to work in the relevant country of employment
8. We deliver training (both on induction and periodically thereafter) to employees and our supply chain about modern slavery and human trafficking and how to take steps to prevent it
9. We undertake audits of certain key supply chain partners to assess their controls and learn from best practice. From time to time, we will ask these partners to complete follow-up actions. We undertake detailed reviews of a sample of those audits
10. We have helped to develop and implement industry-wide training on modern slavery through the Supply Chain Sustainability School
11. We are working with the Gang-masters & Labour Abuse Authority (GLAA) and others to drive awareness of modern slavery issues and best practice in the construction sector and in our business and operations. In collaboration with Jericho, we have trained our Mental Health First Aiders to raise awareness and spot the signs of modern slavery on site
12. We have put in place a risk matrix to inform our due diligence approach when sourcing items directly from certain markets which are considered to have a higher risk of modern slavery
13. We have published our Financial Year 2021 Modern Slavery Statement on the UK Government's Modern Slavery

NEXT STEPS

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking. Next steps will include:

1. Developing KPIs to assess the effectiveness of our management of the modern slavery and human trafficking risks associated with our business
2. Creating new Speak Up posters focused on different signs of modern slavery and include the Chartered Institute of Building and Construction Industry Training Board supported 'SOS hand signal' to show a non-verbal way for victims to raise an alert that they need help on site
3. Including the SOS hand signal in the mandatory modern slavery training for employees

4. Exploring with 3rd party organisations ways to further develop our processes, including enhancing our audit process
5. Developing a toolkit to provide improved ways of identifying supply chain risk related to modern slavery including how to mitigate or manage the risk
6. Rolling out our workforce management system across our sites which will enable us to have robust attendance records as well as enabling our subcontractors to confirm their employees' right to work
7. Utilising our workforce management system to enable better visibility on the demography of our workforce to help inform further initiatives, including making toolbox talks available in relevant languages
8. Exploring opportunities to work with charities with a view to providing support to modern slavery 'survivors', including offering employment with Kier
9. Working with our subcontractors and their supply chain to drive compliance with our Real Living Wage policy
10. In line with our Building for a Sustainable World framework, establish a working group to explore ways to further improve our processes.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Kier's modern slavery and human trafficking statement for the financial year ended 30 June 2022. It was approved by DHMS's board of directors on 14 December 2022.

Signed on behalf of the board of directors of DHMS Civils by:

Executive Director, Construction

A handwritten signature in black ink that reads "Chris Hindmarch". The signature is written in a cursive, flowing style.

Chris Hindmarch

14/12/2022