

# **Human Rights Policy**

### Introduction

We acknowledge that businesses have a responsibility to respect internationally recognised human rights which address social, workforce, economic, cultural, civil and political concerns. Keller is fully committed to respecting human rights in accordance with its core values. It expects excellence in its operations which relies on the fair treatment of staff and working partners, to collaborate across borders and in environments that support human rights, and for all of our directors, officers, employees and those working on our behalf to comply with the law and act ethically and with integrity at all times, as set out in Keller's Code of Business Conduct.

This Policy acts in conjunction with the company's Modern Slavery and Human Trafficking Statement to assure that human rights' infringements are not taking place in its business or any part of its supply chain.

# Scope and application

This Policy applies to Keller Group plc, its subsidiaries and its employees (the "Group").

The Group expects all of its employees, suppliers, sub-contractors, business partners and those it does business with to comply with this Policy.

We will comply with all applicable laws and respect internationally recognised human rights wherever we operate and where national law and international human rights standards differ, or are in conflict, the Group will seek ways to honour the principles of internationally recognised human rights when faced with conflicting requirements. We will treat the risk of causing or contributing to gross human rights abuses as a legal compliance issue.

This Policy is publicly available and communicated internally and externally to all employees, business partners and other relevant parties.

### **Our Commitment**

This Policy sets out the Group's overarching commitment to support human rights. This commitment is based on our membership with the UN Global Compact and abiding by the International Bill of Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights.

This Policy is reflected in operational policies and procedures to ensure that it is embedded throughout the organisation, in particular the supporting information listed at the bottom of this Policy.

It is also reflected in our partnerships which collaborate for change. More information about our partnerships can be found by clicking <a href="here">here</a>.

Our key human rights priority areas are that:

- We value diversity and do not discriminate in any way unrelated to an individual's ability to do their job.
- We are all responsible for living up to Keller's standards on human rights and treating each other with respect.
- We take health and safety seriously and promote safe working in all our actions.
- We offer a fair market related package of pay and related benefits.
- We allow freedom of association. Workers must be free to join associations of their own choosing and have the freedom of collective bargaining where the local law confers such rights
- We comply with all applicable child labour and forced labour laws;

# Identifying and addressing human rights impacts

The Group has policies and processes in place to identify, prevent, mitigate and account for how it addresses its human rights impacts.

The Group identifies and addresses human rights impacts in the following ways:

- Making impact assessments in respect of human rights risks and mapping out salient risks;
- Ongoing due diligence processes are used to identify, prevent and mitigate and account for negative human rights impacts which the organisation may cause or contribute to through its own activities or which may be directly linked to the company's products, operations or services by a business relationship;

- The due diligence process draws on internal and/or independent external human rights expertise and involves appropriate and meaningful consultation with potentially affected stakeholders;
- Consultation with internal and external stakeholders to identify and respond to their expectations;
- Tracking and regularly reporting on human rights risks and the effectiveness of our response;
- Established systems of accountability;
- A commitment to training all of our staff/compliance/legal/procurement teams in respect of human rights.

Our policy is informed by legal requirements as well as international conventions and declarations such as:

- International Bill of Human Rights
- ILO's Declaration on Fundamental Principles and Rights at Work
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

# **Complaints**

Potential and/or actual violations of this Policy or non-compliance with this Policy and any allegation of adverse Human Rights impacts can be reported via the Group's internal Whistleblowing Mechanisms.

If you have a genuine concern that you wish to report, try to speak up at the earliest opportunity, ideally to your line manager. 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 don't feel comfortable talking to anyone at work, you can use a confidential and anonymous reporting line operated by Safecall, a completely independent company that specialises in handling concerns at work.

Further information can be found in the Group's Whistleblowing Policy Whistleblowing Policy | Keller Group plc.

### Governance

This policy has been approved by the Board.

The Sustainability Committee will oversee compliance with this Policy and will make every effort to ensure compliance with the commitments contained within this Policy.

The Group will review and update this Policy to ensure it reflects the results of the assessments envisaged in the ongoing due diligence and stakeholder feedback processes.

# **Supporting information**

The below policies which can be found here should be read in conjunction with this Human Rights Policy:

- Code of Business Conduct
- Modern slavery and human trafficking statement
- Supply Chain Code of Business Conduct
- Whistleblowing Policy
- Human Resources Policy
- Health, Safety and Wellbeing Policy
- Sustainability Policy
- Biodiversity Policy
- Procurement Policy
- Recruitment Policy

### **Document change history**

_ common constraints	
Policy status	FINAL
Issue date	15.12.2023
Last updated and approved	13.12.2024
Policy owner	Company Secretariat