



# Supply Chain

Code of Business Conduct

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## 1. Introduction

We expect all of our directors, officers and 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 <https://www.keller.com/code-of-business-conduct>. We have the same expectations of our suppliers. Our goal is that by working together, we can build a sustainable business relationship for both parties.

Keller expects its suppliers to operate and to procure that their suppliers operate in accordance with the principles in this Supply Chain Code of Business Conduct ("Supply Chain Code") and in full compliance with all applicable laws and regulations. Keller also requires its suppliers to make their employees, contractors, and workers aware of this Supply Chain Code and to procure that their own suppliers do so too. This Supply Chain Code goes beyond compliance with applicable laws by drawing upon internationally recognised standards to advance social and environmental responsibility. When differences arise between standards and legal requirements, the stricter standard shall apply, in compliance with applicable law.

This Supply Chain Code outlines Keller's expectations for our supply chain conduct regarding labour and human rights, health and safety, environmental protection, ethics and management practices.

The principles described within Keller's Code of Business Conduct as well as this Supply Chain Code are based on the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights (together the "International Standards") and we also expect our suppliers to encourage and work with their own supply chain to ensure they also work to meet these International Standards.

## 2. Sustainability

Keller's commitment to sustainability includes efficient use of resources, respect for the environment and safe and healthy workplaces.

We expect our suppliers to:

- comply with all local and country health and safety laws and regulations as well as industry requirements;
- comply with all local and country laws and regulations for the protection of the environment;
- manage their operations to minimise negative impact to the environment and community;
- provide a safe and healthy work environment for their employees, including training, work procedures and personal protective equipment;
- comply with all applicable workplace health and safety laws; and
- establish and maintain a management system or programme that encourages continual improvement in health and safety performance.

## 3. Ethics and legal requirements

Keller conducts its business ethically and in accordance with the law and expects its suppliers to conduct their business in the same way.

### 3.1. Anti-corruption laws

We emphasise the importance of being compliant with all local and national legislation and of avoiding all forms of corruption, bribery or other unethical activities. While acting on our behalf, we expect our suppliers to

- disclose in advance any relationship with a Keller director, officer or employee or person working with Keller that might represent a conflict of interest;
- comply with all applicable anti-trust and competition laws;
- comply with all applicable anti-bribery and corruption laws, including the UK Bribery Act 2010 and the United States Foreign Corrupt Practices Act and similar laws, and have in place adequate

- policies and reliable procedures designed to prevent bribery and corruption
- keep complete, accurate and reliable records of all matters related to their business with Keller and provide copies of relevant records on request; and
- protect Keller's confidential information and take all reasonable steps to prevent its disclosure, loss, theft, damage or unauthorized use.

Suppliers must not:

- develop any relationship with a Keller director, officer or employee or those working for Keller, whether financial or otherwise, which might conflict, or appear to conflict, with such person's obligation to act in the best interests of Keller;
- engage in any form of bribery or offer any incentive to any Keller director, officer or employee or such person's family or friends in order to obtain, retain or influence Keller business;
- grant any personal advantage (e.g. payments and/or loans including smaller gifts over a longer period of time) to public officials; or
- accept or give anything of value that could reasonably be assumed to have a potential impact on business decisions or transactions, in particular accept anything with value from or give anything with value to the management or an employee from Keller.

### 3.2 Anti-Money Laundering and Counter Terrorist Financing

Keller is committed to strictly comply with all applicable Anti-Money Laundering ("AML") and Counter Terrorist Financing ("CTF") laws and regulations. While acting on our behalf, we expect our suppliers to not participate in activities potentially resulting in money laundering or any other illegal practices, in particular to:

- not knowingly engage or attempt to engage in any transaction involving proceeds derived from unlawful activity;
- perform applicable AML / CTF related responsibilities in utmost good faith and immediately report to us any matter suspected to be related to money laundering or terrorist financing; and
- not have dealings with designated individuals and entities (such as suspected terrorists or narcotics traffickers) who are subject to international economic sanctions.

### 3.3 Data Privacy and Security

We expect our suppliers to:

- ensure that Keller's confidential information is held in strict confidence and take all reasonable steps to prevent its disclosure, loss, theft, damage or unauthorized use; and
- protect the privacy of our data and comply with all applicable data protection laws, rules and regulations.

## 4. Human rights and labour standards

As stated above, we expect our suppliers to ensure that they meet the International Standards and to comply with Keller's Human Rights policy and in turn ensure that their own supply chain meets the International Standards and to comply with Keller's Human Rights policy.

We expect our suppliers, in particular but without limitation, to:

- comply with all applicable child labour laws;
- set working hours, wages and overtime pay in compliance with all applicable laws. Workers should be paid at least the minimum legal wage or a wage that meets local industry standards, whatever is greater;
- ensure the work relationship between their workers and the supplier is freely chosen and free from threats and that all workers are free to leave their employment or work after giving reasonable notice in compliance with all applicable laws;
- comply with all applicable laws on harassment and abuse of employees;
- employ workers on the basis of their ability to do the job, not on the basis of their personal

characteristics or beliefs (including race, colour, gender, ethnicity, nationality, religion, sexual orientation, age, disability, maternity or marital status);

- ensure that all workers are treated equally and with respect and dignity without any form of discrimination;
- 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; and
- have adequate policies and reliable systems to prevent the use of illegally or unethically sourced materials, in particular policies and systems to procure steel, cement and concrete from appropriate sources, and provide supporting data on its supply chain for those materials to Keller promptly when requested;
- ensure that all workers operate in a safe and healthy working environment; and
- ensure that all workers have access to grievance mechanisms with fair procedures and remedies.

Suppliers must not:

- use any forced or child labour; or
- subject their employees to psychological, verbal, sexual, or physical harassment or any other form of abuse.

## 5. Compliance

Keller reserves the right to assess and monitor suppliers' compliance with this Supply Chain Code. Any non-compliant suppliers are expected to implement corrective actions promptly and effectively. Any violations of this Supply Chain Code may jeopardise the supplier's business relationship with Keller, up to and including termination.

Suppliers must:

- comply with all applicable laws in the provision of products or services to Keller;
- implement systems and controls to ensure compliance with applicable laws and the principles set out in this Supply Chain Code, including policies, training, monitoring and auditing mechanisms; and
- apply these or similar principles to the supply chain they work with in providing goods and services to Keller.

## 6. Speak up

Suppliers can report suspected violations of this Supply Chain Code or questions with respect to it to: [secretariat@keller.com](mailto:secretariat@keller.com)

If an external anonymous contact is required, suppliers or business partners can contact: [Report An Incident & Update \(safecall.co.uk\)](https://safecall.co.uk)

## 7. Supporting information

- Code of Business Conduct
- Human Rights Policy

## 8. Document change history

Policy status:	FINAL
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