



Our Code of Business Conduct

Keller Group plc

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To request any of the documents listed in this Code contact secretariat@keller.com or go to www.keller.com

Introduction

Our Code of Business Conduct sets out our minimum expectations for all of our people, wherever we are based and whichever Keller business we work for.

Our Code brings together three things to keep us safe:

1. At the heart of our Code is the simple principle that we always follow the law. The trust of our customers and other stakeholders depends on our reputation as a law-abiding business. Keller will never ask an employee to break the law for commercial gain.
2. To make sure we follow the law, we have developed nine key commitments, which are elaborated in more detail in our group policies. These provide us with a protective layer of information, and set out requirements and guidance to ensure that we know how the rules apply to us.
3. Beyond the law, our key commitments and our policies, we must always be guided by Keller's values. These can guide us when we make difficult decisions.

Our Code is also supported by our Whistleblowing Policy which provides details of how to report a concern.

Our values

Safety

We do not compromise on health and safety. We demonstrate concern for each other's safety, health and wellbeing. We take the time to identify risks, ensuring they are controlled and communicated. We learn and improve to ensure our standards are industry leading.

People

We grow and value our people. We grow our people through feedback and coaching. We empower our people through responsibility and accountability.

Integrity

We always do the right thing. We model commitment and professionalism in every action. We build trust through reliability, transparency and fairness.

Excellence

We consistently deliver high performance. We pursue continuous improvement for high-quality outcomes. We deliver results with persistence and tenacity.

Scope

Our Code applies to all legal entities which Keller Group plc wholly owns, has a majority stake in, or has overall operational control of, worldwide.

Our Code applies to all persons working for us or any Keller Group company, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns and individual temporary or fixed-term contractors, wherever they are located worldwide.

Each person has a responsibility to read and comply with this Code.

This Code does not form part of any employee's employment contract and we may amend it at any time.



Introduction

As employees of Keller, we all have a responsibility to create a company we can be proud of.

A company's success is often measured in financial terms, that is, how much it grows and how profitable it is. While these indicators are necessary, they can never describe the full story. A company clearly needs to perform well in other dimensions. It has to create satisfied customers, it needs to obey national laws, it should create value for the wider communities and, of course, it needs to create a sense of community amongst its employees. How we do these things at Keller will determine how proud we feel about the company we work for.

How we behave as individuals really matters, not only in terms of the direct results of our actions but also because our behaviour influences others around us – we all collectively contribute to the Keller culture. We all want a positive culture that makes us successful financially and ensures we operate in the right way. This Code of Business Conduct is an important pillar of our Keller culture.

There are two distinct types of situation we should consider:

When the situation is clear. Examples would include rejecting fraud or following our safety procedures on a job site. Our responsibility as individuals is to understand the rules and procedures that we should follow and to live up to that standard at all times. As a leader, you must ensure your teams have access to the right information and that we are following up on areas where we need to improve. We all need to contribute to making our rules and procedures 'real' – sensibly designed and practical so that we can rightly expect our teams to adhere to them.

The second area is when a situation is less clear cut. An example would be a supplier inviting you out for a meal – should you accept or decline? Here we are relying on guidelines rather than strict rules and we expect our employees to make practical judgements considering the actual situation.

We can help shape these judgements by listing examples with recommendations, but we cannot list every real-life scenario. We are relying on all of you to build up a collective sense of behaviours, and ultimately values, that we apply to all situations. Keller encourages you to talk to others in these cases, which is important to help you make the right judgement in each situation. Equally importantly, it will help share a common 'Keller way' of doing things right.

There have been many high-profile failures of individual and collective conduct in some notable companies around the world. The penalties in terms of company reputation and financial damage can be enormous. This is a serious subject and we must get it right. However, in addition to following the rules and guidelines to protect Keller's reputation, if we all also adopt the behaviours and values that this Code outlines, we can ensure a vibrant and positive culture that will make us successful in all senses of the word.

Our nine key commitments

- 1. Keeping everyone healthy and safe**
We believe no one should be harmed as a result of any work we do – so everyone stays safe and well.
- 2. Supporting employees' rights and diversity**
We value, support and protect the rights of our employees, the dignity of the individual and the diversity of our people – so we are all treated with respect.
- 3. Maintaining ethical and honest behaviour**
We expect all of our people, and anyone working for us or on our behalf, always to be honest, act with integrity and comply with the law and standards applicable to us.
- 4. Staying free from fraud, bribery and corruption**
We always make sure we are free from fraud, bribery and corruption and win projects fairly – so people know our decisions are made for the right reasons.
- 5. Keeping our communications open and responsible and protecting data**
We communicate openly, honestly, clearly and responsibly. We protect data appropriately.
- 6. Delivering excellent customer service and working with our suppliers to ensure they adhere to our standards**
We work to meet our customers' needs and exceed their expectations – so they work with us again and again.
- 7. Working within the community**
We act responsibly and respectfully towards the communities we work in because we are a part of them.
- 8. Protecting our environment**
We respect and protect the environment, and aim to have a positive impact on it – so we safeguard the future.
- 9. Standing up for what's right**
We always speak up when we believe our Code, our policies or the law are being undermined – so we uphold our principles together.



1 Keeping everyone healthy and safe

We believe no one should be harmed as a result of any work we do
– so everyone stays safe and well.

What we stand for

We believe that no person, whether an employee, customer, contractor or anyone else, should be harmed as a result of work we do or services we provide. We are strongly committed to achieving an incident-free environment. We always make sure we have the right health and safety standards and procedures in place, along with the right tools and equipment. We comply with all applicable laws and collective agreements regarding health and safety.

We understand that safety is the responsibility of everyone. We make sure all employees, contractors and third parties are properly trained and feel confident to challenge and report unsafe practices.

We actively monitor the effects our work might have on health and ensure everyone on our team is fit and healthy to do their job competently and responsibly.

We constantly seek to eliminate the causes of accidents and risks, learning from every incident to prevent it from happening again.

Why it is important

- We care about people. In our business, carelessness, lack of planning and lack of leadership can result in serious accidents and even deaths.
- Safety is at the heart of who we are and how we work. If we fail to implement the right procedures or maintain exacting standards of care for our people and the public, we put others in risky situations.

Further information

- Health, Safety and Wellbeing Policy
- Our wellbeing foundations
- Sustainability Policy
- Respect in the Workplace Standard



2 Supporting employees' rights and diversity

We value, support and protect the rights of our employees, the dignity of the individual and the diversity of our people – so we are all treated with respect.

What we stand for

We are committed to being a diverse and inclusive place to work, reflecting the world in which we operate. Our Inclusion Commitments bring together what we are doing to ensure this.

We work together to create an environment where we all have equal opportunities to achieve our full potential, talent is recognised and developed and we're encouraged to deliver exceptional performance.

We believe in treating everyone equally with fairness, encouragement and respect.

We won't tolerate any behaviour or attitudes that discriminate against anyone, or coerce, intimidate, bully or harass others, or threaten them with verbal or physical violence. We encourage people to speak up whenever we see such things happening.

We support every individual's human rights and refuse the use of illegal child labour, forced labour, human trafficking and modern slavery under any circumstances.

We ensure that no employee is discriminated against due to their gender, race, religion, national origin, sexual preference or gender identity.

We recognise and respect the rights which employees have under applicable laws, including any rights to collective representation and collective bargaining.

We educate and train our employees to ensure compliance with the law, including government rules and regulations.

Why it is important

- How we treat each other is fundamental to who we are and what we want to be as a business.
- Abuse, exploitation, slavery and discrimination are opposed to all that we value and wish to uphold wherever we work in the world.
- Where all our people can flourish equally, we know we will flourish. Making the best use of our talent will benefit our business, people and society.



Further information

- Human Resources Policy
- We are Keller: Our Inclusion Commitments
- Respect in the Workplace Standard
- Human Rights Policy
- Modern slavery and human trafficking statement

3 Maintaining ethical and honest behaviour

We expect all of our people, and anyone working for us or on our behalf, always to be honest, act with integrity and comply with the law and standards applicable to us.

What we stand for

We believe our responsibility is greater than simply complying with the law. We believe in establishing fair relationships with all our stakeholders, because we're confident that good ethics leads to good business.

We always set out to act in our customers' interests, to the highest standards of excellence, never gaining advantage through dishonest or uncompetitive means. We comply with all applicable competition and antitrust laws.

Antitrust and fair competition laws generally prohibit activities that restrain free trade or limit competition. Prohibited activities include collusion with competitors to fix prices, share markets or allocate customers or territories, and sharing of commercially sensitive information with competitors, such as pricing and strategy.

We never seek to bully or cheat our contractors or suppliers, and ensure they are fully, fairly and promptly paid for their services.

We are transparent in all our dealings with government and regulators, fulfilling our obligations honestly and promptly.

We pay our fair share of tax and never engage in tax evasion or facilitate tax evasion by anyone else. Our tax strategy is clear about this.

We comply with all applicable sanctions and import and export controls.

The modern slavery and human trafficking statement sets out the steps we have taken, and continue to take, to ensure that modern slavery and human trafficking have no place in our business or our supply chain.

We have the same expectations of legality, ethics and integrity of our supply chain.

Why it is important

- Our reputation for integrity is perhaps our most valuable business asset. If we lose it through dishonesty or trying to do something underhand, unfair or unethical, we also lose the trust of our customers and others.

- Just one act of dishonesty or unethical behaviour, and sometimes even the suspicion of it, can destroy our credibility, our share price, our working relationships – and our future.
- The legal consequences of non-compliance, including large penalties and/or imprisonment, are too high to be ignored.

Further information

- Anti-bribery and Anti-fraud Policy
- Competition Law Compliance Policy
- Procurement Policy
- Supply Chain Code of Conduct
- Corporate Criminal Offence (Anti-Facilitation of Tax Evasion) Policy
- Tax Strategy
- Modern slavery and human trafficking statement
- Human Rights Policy



4

Staying free from fraud, bribery and corruption

We always make sure we are free from fraud, bribery and corruption – so people know our decisions are made for the right reasons.

What we stand for

We believe in always doing our business legally and ethically. We have a zero-tolerance approach to fraud, bribery and corruption. We never offer or accept bribes, or participate in any other kind of fraudulent or corrupt practice, even when not to do so would clearly result in commercial loss.

Keller does not make any political donations. We avoid giving or receiving money, gifts or favours that could influence someone's decision or be open to misinterpretation. We follow the approval and record-keeping requirements in our Anti-bribery and Anti-fraud Policy for all gifts and hospitality.

We win projects fairly and honestly – even if others play unfairly.

Our principle is to respect the traditions and cultures of the countries and communities in which we work, always applying the highest ethical standards and rejecting illegal activities.

We avoid entering into situations where personal, family or financial interests may conflict, or give rise to the appearance of a conflict, with the interests of Keller. Where any potential conflict of interest arises, we immediately disclose this and seek approval from our line manager before proceeding.

We will not penalise anyone for refusing to pay a bribe, make a facilitation payment or engage in any form of fraudulent or corrupt activity, even if that refusal results in a loss of business to us.

We believe prevention is better than cure and have the right procedures in place. If we have any doubts about what we should do, we speak to our manager or Ethics and Compliance Officer.

We expect our supply chain to comply with the law and act ethically and with integrity at all times.

Why it is important

- We are strongly committed to enhancing ethical practices worldwide.
- Even if a bribe might be 'customary' and help obtain or retain a contract, it is prohibited. Any corrupt activity could seriously damage our business and our reputation.
- The legal consequences of non-compliance, including large penalties and/or imprisonment, are too high to be ignored.

Further information

- Anti-bribery and Anti-fraud Policy
- Corporate Criminal Offence (Anti-Facilitation of Tax Evasion) Policy
- Procurement Policy
- Supply Chain Code of Conduct



5 Keeping our communications responsible and protecting data

We communicate openly, honestly, clearly and responsibly. We protect data appropriately.

What we stand for

We don't hide information others should know; we don't disclose information we shouldn't. We're clear and honest about our products, services, processes, policies, achievements and prospects.

So:

- we tell people what they need to know in good time
- we always try to inform and never mislead
- we make sure what we say is accurate, appropriate, clearly stated, and clearly understood
- we listen
- we keep trying to get better.

We want our trading partners to know that we keep any confidential information or data we have about them safe and secure.

We comply with all applicable confidentiality obligations.

We don't try to get information about our competitors through any unlawful or dishonest means.

We comply with applicable personal data protection laws.

We never use in the course of our employment with Keller any confidential or proprietary information belong to a former employer.

We use our devices and systems appropriately and remain alert to potential cyber threats. We use AI responsibly.

We recognise the value in our intellectual property, confidential information and data and keep it safe.

As a listed company, Keller is required to comply with the UK Market Abuse Regime and related rules about "inside information". Inside information is non-public information which is share-price sensitive. By setting out clear requirements in our Share Dealings Code, we help our employees to deal in the company's shares without breaking the law, ensuring that there is transparency in their dealings.

Why it is important

- Clear two-way communication is at the heart of great teamwork and successful projects.

- Information that's unclear or misleading, not given when it should be – or given when it shouldn't – can obstruct progress or have significant legal consequences.
- We need our stakeholders to trust us. What we say about ourselves and them, how we say it and when we say it, and how we protect their data, all have a vital role in creating or destroying that trust.
- It is a criminal offence to encourage insider dealing or disclose inside information with a view to others profiting from it.

Further information

- Share Dealings Code
- Information Management Policy
- Data Protection Policy
- Acceptable Use Policy
- Responsible AI Policy
- Privacy Policy

6

Delivering excellent customer service and working with our suppliers to ensure they adhere to our standards

We work to meet our customers' needs and exceed their expectations – so they work with us again and again

What we stand for

We expect our supply chain to comply with the law and act ethically and with integrity at all times. We outline our expectations for our supply chain regarding labour and human rights, health and safety, environmental protection, ethics and business and management practices in our Supply Chain Code of Conduct.

We treat our suppliers fairly and ensure we build constructive relationships with our suppliers and that they understand and commit to our ways of working and standards.

We want our customers to trust and value the products and services we provide to them, meeting and exceeding their expectations every time we deal with them. We go the extra mile to ensure the services and products we offer are consistently excellent, reliable, safe and appropriate.

We do our utmost to make it easy for our customers to contact us, dealing speedily, efficiently and courteously with their enquiries and concerns, being honest and open and taking personal ownership for solving their problems.

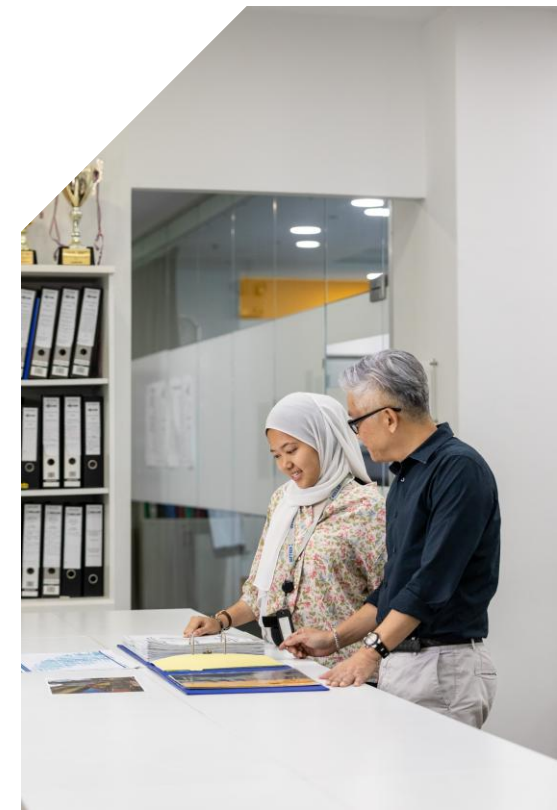
We follow our internal approval procedures for all bids and contracts to ensure that there is an appropriate balance of risk and reward in our projects. We meet our contractual obligations to our trading partners.

Why it is important

- Customers have choice and access to information that helps them choose. Our products and services must be consistently excellent in order to give customers confidence in the service we provide.
- We aim to give customers positive experiences and leave them feeling valued.
- If we do this, we will delight our customers and they will recommend us to others.
- Building strong relationships with our suppliers will enable us to obtain the best value, service and quality.
- We want to work with suppliers who understand us, comply with the law, act with integrity and adhere to our key commitments and Supply Chain Code of Conduct.

Further information

- Quality and Continuous Improvement Policy
- Procurement Policy
- Supply Chain Code of Conduct



7 Working within the community

We act responsibly and respectfully towards the communities we work in - because we are part of them.

What we stand for

We want our work to bring value to the community, not distress.

We are always aware of the impact our activities might have and ensure they are carried out considerately, with minimum disruption.

We care about the concerns of local communities and know how important it is for people to feel they are being heard. We respect the community's rights wherever we operate. We believe in communicating, listening and trying to act on concerns whenever we can. We provide people with a complaints procedure and we take their complaints seriously.

We seek to play a positive and beneficial role in the wider community through charitable partnerships and by encouraging and supporting our employees to participate in community events.

Our Charitable Giving Policy is an important part of our approach to building strong community relationships and ensuring our work creates a positive legacy that helps local communities to thrive. Charitable donations, whether in the form of money or donations in-kind (such as time, products, or services), are an important part of our commitment to our stakeholders.

We support both local and global good causes, and we actively encourage our employees to get involved with both fundraising and volunteering.

Why it is important

- What we do is an integral part of the community and the community is ultimately our customer.
- Poor relationships damage and can even destroy our reputation. Good relationships win us goodwill.

Further information

- Sustainability Policy
- Charitable Giving Policy



8

Protecting our environment

We respect and protect the environment, and aim to have a positive impact on it – so we safeguard the future.

What we stand for

We want to protect and improve our environment for the future, not destroy it. We choose to set environmental standards that require us to go beyond minimum legal requirements and we'll continue to raise the bar for the future.

We make sure our suppliers have consistent environmental standards and controls.

We make improving our environmental impact a core part of what we do by building it into projects we undertake.

Why it is important

Acting responsibly and sensitively towards the environment, and taking environmental issues seriously, is key to how we are judged as a business. Clients, investors, auditors and other stakeholders ultimately hold us to account for our environmental performance.

Further information

- Sustainability Policy
- Supply Chain Code of Conduct
- Biodiversity Policy



9 Standing up for what's right

We always speak up when we believe our Code, our policies or the law are being undermined - so we uphold our key commitments together.

Our Code

Our Code and key commitments are there to enable us and ensure we work to the standards we set ourselves as a company. They are also there to protect us and create an environment in which fairness, integrity and respect are the norm.

It's the job of each of us to make sure that's how it stays. We all play a part in keeping our values and key commitments alive and relevant in our day-to-day activities.

Sometimes this will mean facing difficult situations when we must stand up and challenge behaviour or practices we think are wrong.

When this happens, it is important for all of us to know that we will always be supported by the company. It can take courage to speak up for what is right. We want everyone to know that we stand behind those who find that courage.

As a company, Keller is committed to ensuring no one suffers retaliation because of reporting concerns or suspicions in good faith. All we ask is that your concern is genuine.

We treat all concerns seriously, conducting investigations and taking actions as appropriate. Engaging in illegal activities or breaching our Code or policies may result in disciplinary or corrective actions, up to and including dismissal.

What to do

We provide a clear process for people to report their concerns. If you believe or suspect that a breach of this Code has occurred or may occur:

You are encouraged to speak up at the earliest opportunity, ideally to your line management.

If you feel you can't do this, we encourage you to contact an Ethics and Compliance Officer, a member of the Legal or HR Teams or one of your senior managers.

If you prefer, you may report concerns via the confidential reporting line operated by Safecall, a completely independent specialist company.

Safecall can be contacted in the following ways in many different languages:

By telephone: a list of telephone numbers can be found at <https://www.safecall.co.uk/en/file-a-report/telephone-numbers/>

By email: to keller@safecall.co.uk

Online: at <https://www.safecall.co.uk/en/file-a-report>

We encourage you to co-operate with any investigation that the company undertakes.

Further information

- Whistleblowing Policy

Last thoughts

Each of us also plays an important role in helping one another to find the right answer. If in doubt, ask.

This is especially true of our leaders and senior managers.

We need people who lead by example, who are a role model for others, who act and decide according to our principles, so we know we can go to them when we need advice.

There's always someone to help. If you're not sure what to do, ask your manager, local Ethics and Compliance Officer or a member of the People or Legal Teams. If you have a compliance concern or suspicion, you can also report this via Safecall. Please refer to the details given on the previous page.

If you need additional support or advice, there are more resources which set out more detailed compliance requirements and which can help guide you to the right decisions. You can find translations and details of Keller Group policies on www.keller.com. Further briefing material is available from your local Ethics and Compliance Officer.

New challenges and issues emerge all the time, so now and again we'll be updating our Code to keep it relevant. We welcome everyone's input to help make each new version better than the last.

Remember – we all hold our company in our hands. What we do, or fail to do, defines the environment we work in and can enhance or destroy the reputation of Keller.

Thank you for using your judgement to help us follow this Code in all that we do.

Please contact us with your feedback or to request any of the documents listed in this code on: secretariat@keller.com.

Any questions about this Code and how it should be operated in practice should be referred to the Group General Counsel or any Ethics and Compliance Officer.

If in doubt, ask.



9

Safecall numbers around the group

Asia-Pacific	
Country	Telephone number
India	000800 4401256
Indonesia	001 803 440884
Indonesia	007 803 440884 PT Telekom
Malaysia	1800 220054
Singapore	800 448 1773
Vietnam	12011157 VNPT
Vietnam	121 020036 Mobifone
Vietnam	122 80725 Viettel
Australia	1800 312928
New Zealand	00800 72332255

Europe and Middle East	
Country	Telephone number
Austria	00800 72332255
Algeria	+44 191 5167764
Bahrain	8000 4264
Czech Republic	00800 72332255
Egypt	0800 0000059
Finland	990 800 72332255 Telia Sonera 999 800 72332255 Elisa
France	00800 72332255
Germany	00800 72332255
Hungary	00800 72332255
Italy	00800 72332255
Kazakhstan	8800 333 3499
Mexico	01800 1231758
Mozambique	+44 191 5167764
Netherlands	00800 72332255
Oman	800 72323
Poland	00800 72332255
Portugal	00800 72332255
Romania	0372 741 942
Saudi Arabia	800 8442067
Slovakia	0800 004 996
Spain	00800 72332255
Sweden	0850 252122
Switzerland	00800 72332255
UAE	8000 4413376
Ukraine	0800 502436
United Kingdom	0800 9151571

North America	
Country	Telephone number
Canada	1 877 5998073
United States	1 866 9013295

If your country is not listed,
please find your local number on
the [Safecall website](#).