



# **Modern Slavery and Human Trafficking Statement**

# **This statement is made pursuant to Fighting Against Forced Labour and Child Labour in Supply Chains Act (Supply Chains Act) and constitutes our modern slavery and human trafficking statement for the financial year ended 31 December 2025.**

## **Introduction**

At Keller, we require all of our directors, officers and employees, and those working for us or on our behalf, to comply with the law and act ethically and with integrity at all times. This is reflected in Keller's Code of Business Conduct and Supply Chain Code of Business Conduct.

We recognise that modern slavery (including all forms of forced labour and child labour) and human trafficking are significant human rights issues. This statement sets out the steps Keller has taken and continues to take to seek to ensure that modern slavery and human trafficking are not taking place in its business or supply chain.

This statement is made by Keller Foundations, Ltd. and Keller North America, Inc. each of whom is a reporting entity under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (**Supply Chains Act**) (together, the **Canadian Reporting Entities**)). Keller Foundations, Ltd. is headquartered in Toronto, Ontario and Keller North America, Inc. is headquartered in Hanover, Maryland. Both conduct operations throughout Canada. Keller North America, Inc. and Keller Foundations, Ltd. are both wholly owned by Keller Group plc, (the **Group**).

## **Our business and organizational structure**

The Group is the world's largest geotechnical specialist contractor. For the year ended 31 December 2025, the Group's annual revenue was £3bn. The Group employs around 10,000 people and performs around 5,500 contracts a year. The Group has three Divisions:

- North America; which is the division in which the Canadian Reporting Entities operate
- Europe and Middle East; and
- Asia Pacific

Specifically in North America, Keller Foundations, Ltd. employs about 370 employees and Keller North America, Inc. employs about 2900 employees. Keller Foundations, Ltd. has a revenue of 254 million and Keller North America, Inc. has a revenue of 1.4 billion.

At its simplest, we get ground ready to build on, providing solutions to geotechnical challenges across the entire construction sector. We have the people, expertise, experience and financial stability to respond quickly and see projects through safely and successfully.

Our strategy is to be the preferred international geotechnical and specialist construction contractor focused on enduring markets and attractive projects, maximising long-term value for our stakeholders.

While the value chain and construction process varies significantly from project to project, Keller is typically the first contractor on-site and the first off-site. Most commonly we act as a subcontractor to a main contractor for the projects we undertake.

### *Operations*

- We are a geotechnical and specialist construction contractor. We get the ground ready for construction of any type of structure.
- We have an extensive branch network operated by local teams that have deep knowledge of their local markets and ground conditions.
- Our local engineering teams have access to Keller's global network of engineers for product support and best practice knowledge.
- We offer a market-leading range of geotechnical and specialist construction products/techniques. These are used in solutions for deep foundations, ground improvement, grouting, earth retention, marine, post-tension systems and industrial services.

- We maintain, invest in and manufacture specialist equipment. Our local branches have their own offices and equipment yards. Our equipment yards are used to optimise, service and store our equipment and tools that are used in construction projects.
- Our strong balance sheet and cash generation allow us to maintain key resources through the market cycle and reinvest for growth.

### *Supply chain*

- The Canadian Reporting Entities rely on our supply chain partners to source quality materials, goods and services for our projects. Our most common materials include concrete, cement, steel and aggregate.
- Materials are typically sourced locally by the Canadian Reporting Entities. This means that our supply chains are generally short and agile, enabling more efficient project delivery.
- We rely on external manufacturers for the supply of machinery and equipment that we use to deliver our projects.
- Another entity in the Group also manufactures specialist rigs and tools in-house that we believe gives us a competitive advantage in particular products.

## **Our policies**

The policies described below are available on our website, along with other policies referred to in our Code of Business Conduct (our **Code**), and can be found on our website [here](#). Our Code and Group policies apply to all entities within the Group including the Canadian Reporting Entities. Our Code and Group policies are reviewed regularly, particularly where legislation has been updated or the Group's internal procedures have changed. These are then communicated both internally across the Group, including within the Canadian Reporting Entities, and to our business partners as appropriate.

### **Code of Business Conduct**

Our Code of Business Conduct sets out the minimum expectations for all of our people wherever they are based and whichever Keller business they work for. At the heart of our Code is the simple principle that we always follow the law. To make sure we follow the law, we have developed nine key commitments, which are elaborated in more detail in our group policies. Beyond the law, our key commitments and our policies we are guided by Keller's values: Safety. People. Integrity. Excellence.

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, including the Canadian Reporting Entities. 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.

The Code specifically states that 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. It also states that 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.

### **Supply Chain Code of Business Conduct**

Our Supply Chain Code of Business Conduct provides that we expect our suppliers to operate and procure that their suppliers operate in accordance with the principles in our Supply Chain Code of Business Conduct and in full compliance with all applicable laws and regulations. It contains a dedicated section on human rights and labour standards. It also states that the Group has reserved the right to assess and monitor suppliers' compliance with our Code of Business Conduct and Supply Chain Code of Business Conduct.

### **Human Rights Policy**

Our Human Rights Policy provides that the Group is fully committed to respecting human rights in accordance with our core values. It also sets out our expectations of our suppliers, sub-contractors and other business partners, as well as our key human rights priority areas.

## Whistleblowing Policy

Our Whistleblowing Policy encourages employees and others to raise concerns. It sets out details of our internal reporting channels and our external independent whistleblowing channels which are available 24/7 and allow employees and third parties to raise concerns via telephone, email or online in a large range of languages.

## Human rights and labour standards in our supply chains

Due to the breadth of our operations, including geographies and industry sectors, we recognise that we need to be vigilant to the risk of modern slavery in our supply chains. We also recognise that the construction sector has been identified as a sector with inherent risks of modern slavery. We expect the Canadian Reporting Entities' supply chain partners to respect the human rights of their employees and contractors and treat them fairly, in accordance with all applicable laws. Keller's site teams are especially vigilant to the human rights and modern slavery risks in our labour agencies.

The Canadian Reporting Entities expect supply chain companies to:

- comply with all applicable child labour laws;
- set working hours, wages and overtime pay in compliance with all applicable laws. Workers must 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;
- 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.

We expect all supply chain companies to not:

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

## Compliance

Keller has the following processes and initiatives in place to: (a) encourage supplier and worker engagement and collaboration; and (b) develop and implement actions, programmes, initiatives and processes to prevent modern slavery:

- Each person in scope of our Code of Business Conduct has a responsibility to read and comply with it. It was launched throughout our business through a communications and training programme that started in December 2016 and has been refreshed periodically.
- Most recently, in January 2026, an updated version of the Code was communicated to the Canadian Reporting Entities.
- Ethics and compliance training is carried out across the Canadian Reporting Entities annually and this covers modern slavery and human rights. It seeks to enable our employees to have the tools

to identify potential compliance concerns, including in respect of human rights impacts. It also encourages employees to raise questions or concerns and informs them who to seek advice from where required.

- Our Code of Business Conduct training will be refreshed and relaunched during 2026, to reflect the updated Code.
- During 2025, Keller continued to make our external independent whistleblowing channels known to our teams locally and onsite.
- During 2025, Keller rolled out a new Escalation Protocol, to enable fast mobilisation in the event of an incident. Our Ethics and Compliance Officers, Legal and Human Resources have all been notified accordingly. Keller will then act appropriately if any allegations of actual or suspected non-compliance are raised.
- Our internal audit team conduct periodic monitoring of compliance with our policies by the Canadian Reporting Entities.

### **Assessing effectiveness and further steps to be taken**

The Canadian Reporting Entities recognize the importance of evaluating the effectiveness of actions taken to combat modern slavery during each reporting period. In 2025, we reviewed and monitored the following:

- All employees were expected to comply with our Code of Business Conduct.
- We maintained our employees' awareness of the signs of modern slavery and human trafficking at site.
- All suppliers were expected to comply with our Supply Chain Code of Business Conduct.
- We monitored our reporting channels for any concerns raised relating to adverse human rights impacts, including modern slavery. We remained committed to reacting promptly and appropriately if allegations of actual or suspected non-compliance were raised.
- Keller's internal audit team continued to conduct periodic monitoring and flag adverse findings.

### **Performance**

Based on their knowledge, the Canadian Reporting Entities have not identified any instances of forced labour or child labour in their supply chains. Consequently, no remediation measures were required for the fiscal year ended December 31, 2025, in respect of any modern slavery – including forced labour or child labour – in the Canadian Reporting Entities' supply chains. As the Canadian Reporting Entities have not identified any instances of forced or child labour in their supply chains, Canadian Reporting Entities have not taken any associated measures to remediate loss of income to the most vulnerable families that result from measures taken to eliminate the use of forced or child labour in their supply chains.

### **Consultation**

This statement was prepared in consultation with key stakeholders in the operating entities in Canada who are in scope of the reporting obligations under the Supply Chains Act.

## Board approval

This report has been approved by the Board of Directors of Keller North America, Inc. and Keller Foundations, Ltd. on behalf of Keller North America, Inc. and Keller Foundations, Ltd., respectively.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above. For clarity, I am providing this attestation in my capacity as a President of Keller North America, Inc. and Keller Foundations, Ltd., and not in my personal capacity.

Signature: \_\_\_\_\_



Name: Scott Nichols

Title: President

I have authority to bind Keller North America, Inc. and Keller Foundations, Ltd.

Date: May 28, 2026

**CORPORATE RESOLUTION OF THE  
BOARD OF DIRECTORS  
OF  
KELLER NORTH AMERICA, INC.**

May 28, 2026

The undersigned, being all the directors constituting the Board of Directors (the “Board”) of Keller North America, Inc., a Delaware corporation (hereinafter, the “Company”), hereby consent to and adopt in writing the following Resolution.

**WHEREAS**, the Company is a reporting entity under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) and must, on or before May 31 of each year, submit a report approved by the Board to the Minister of Public Safety and Emergency Preparedness.

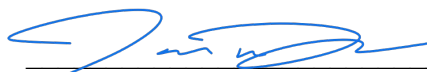
**WHEREAS**, the Board has been presented with a report in the form attached hereto as Exhibit A, the Modern Slavery and Human Trafficking Statement for the Financial Year Ended 31 December 2025 (the “Statement”); and

**WHEREAS**, the Board determined that it is in the best interest of the Company to approve the Statement.

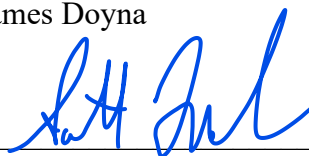
**NOW, THEREFORE, BE IT RESOLVED**, that the directors of the Company be, and hereby are, and each of them acting singly be, and hereby is, authorized and directed to execute and deliver the Statement and all such instruments and documents and do all such other acts and things as in their opinion, or in the opinion of any of them, may be necessary or appropriate in order to carry out the intent and purposes of the foregoing resolutions; and

**RESOLVED FURTHER THAT** this Resolution may be signed in counterparts and may be delivered by facsimile or other similar electronic means, and such counterparts together shall constitute one and the same instrument and shall be deemed to be executed on or as of the date set forth above.

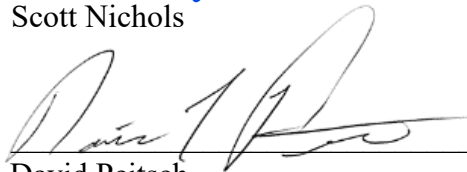
**IN WITNESS WHEREOF**, the undersigned have executed this Resolution on or as of the date set forth above.



James Doyna



Scott Nichols



David Peitsch

**CORPORATE RESOLUTION OF THE BOARD OF DIRECTORS  
OF  
KELLER FOUNDATIONS LTD.**

May 28, 2026

The undersigned, being all the directors constituting the Board of Directors of Keller Foundations Ltd., a corporation incorporated under the laws of the Province of British Columbia (hereinafter, the "Company"), do hereby consent to the taking of the following actions without a meeting in accordance with Section 140 of the Business Corporations Act (British Columbia), and Section 17.12 of the Company's Articles, and approve and adopt in writing the following Resolution.

**WHEREAS**, the Company is a reporting entity under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) and must, on or before May 31 of each year, submit a report approved by the Board to the Minister of Public Safety and Emergency Preparedness.

**WHEREAS**, the Board has been presented with a report in the form attached hereto as Exhibit A, the Modern Slavery and Human Trafficking Statement for the Financial Year Ended 31 December 2025 (the "Statement"); and

**WHEREAS**, the Board determined that it is in the best interest of the Company to approve the Statement.

**NOW, THEREFORE, BE IT RESOLVED**, that the directors of the Company be, and hereby are, and each of them acting singly be, and hereby is, authorized and directed to execute and deliver the Statement and all such instruments and documents and do all such other acts and things as in their opinion, or in the opinion of any of them, may be necessary or appropriate in order to carry out the intent and purposes of the foregoing resolutions; and

**RESOLVED FURTHER THAT** this Resolution may be signed in counterparts and may be delivered by facsimile or other similar electronic means, and such counterparts together shall constitute one and the same instrument and shall be deemed to be executed on or as of the date set forth above.

**IN WITNESS WHEREOF**, the undersigned have executed this Resolution on or as of the date set forth above.

  
\_\_\_\_\_  
Christopher Banks

  
\_\_\_\_\_  
Chantelle Ayotte

  
\_\_\_\_\_  
James Doyna

  
\_\_\_\_\_  
Scott Nichols

  
\_\_\_\_\_  
David Peitsch