



# Charitable giving

## Policy

## 1. Introduction

Keller's 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.

The purpose of this policy is to set out the rules to ensure that we are supporting reputable charities and organisations.

## 2. Policy objectives

The objectives of Keller's Charitable giving Policy are to:

- Have a positive impact on local communities that reflects the focus of our divisions within their local communities and the global profile of our organisation.
- Provide opportunities and encourage employees to volunteer and support the charities that matter to them.

## 3. Our Policy

Our charitable giving and community involvement is focused on causes linked to our business, the communities we work with and our employees.

- We actively promote charitable giving and volunteering amongst our employees, recognising the personal development and team building opportunities they present.
- All employees have one day of paid leave to volunteer.
- All employees can apply for individual charity matching up to £2,000 per annum, subject to the overall annual business unit charitable giving limit .
- Where appropriate we will partner with a national or international charity or organisation, where this charity or organisation will receive support nationally or internationally that can be delivered locally. Such charity or organisation should be aligned with our core business skills and priorities, enabling us to deliver monetary donations, skills, expertise and experience, in addition to potential benefits of scale.
- We will capture and report the value of charitable contributions we make to Keller's Sustainability Committee and to our wider stakeholders through our Annual Report.

## 4. Delivering our objectives

In addition to respecting local laws, the following policy rules apply in relation to charitable donations:

- Charitable donations are only made with the appropriate authority: employees should follow the appropriate process and obtain the appropriate approval. The process and approvals are determined in Keller's Charitable giving Standard and Board Delegated Authorities held locally.
- Charities and organisations: criteria setting out what constitutes a charity and organisation for the purposes of charitable giving under this policy are set out in Keller's Charitable giving Standard.
- Charitable social events organised by Keller: it is important to ensure that suppliers or other stakeholders are not pressured into purchasing tickets for a charity event.
- Conflicts of interest: it is important that appropriate due diligence is carried out to ensure that there are no conflicts of interest between the employee and the proposed charity or organisation.
- No use of expenses to process charitable donations: cash donations to charity may not be made by an employee on behalf of Keller and reclaimed as personal expenses.
- No bribery: where there is a risk of bribery, especially to charities associated with public officials and their families, appropriate due diligence is conducted before such donations are made.
- Donations to political parties are strictly prohibited: for further advice speak to your Divisional Legal Counsel.

## 5. Reporting and response

Keller will capture and report the value of charitable contributions we make:

- Each business unit and division must maintain a log of charitable donations. The Group Company Secretary and Legal Advisor will review the log of charitable donations twice each year and a report will be made to the Executive and Sustainability Committees.
- Charitable donations will be reported annually to our wider stakeholders by means of our Annual Report.
- Employees have a duty to speak up if they believe this policy has been breached. Our Code of Business Conduct provides guidance on who employees can speak to, including your local Ethics and Compliance Manager or the Group Company Secretary and Legal Advisor, and details of Safecall, our externally facilitated and confidential helpline.

## 6. Scope

This policy applies to all legal entities which Keller Group plc wholly owns, has a majority stake in or overall operational control of. This policy is concerned with charitable giving by Keller's employees.

## 7. Governance

The Executive and the Sustainability Committees of the Keller Group plc Board provide oversight of this policy.

## 8. Responsibilities

This policy applies to all individuals who are employed by, or carry out work on behalf of, any Keller group company including contractors, temporary staff and agency workers.

All individuals identified above are responsible for:

- understanding and acting in accordance with Keller's Code of Business Conduct in obeying the law and maintaining high ethical standards;
- following the rules set out in this policy; and
- reporting any breach of these rules to the company in line with this policy.

## 9. Supporting information

- Code of Business Conduct
- Charitable giving Standard
- Anti-Bribery and Anti-Fraud Policy
- Whistleblowing Policy
- Board Delegated Authorities

## 10. Document change history

Policy status:	FINAL
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