



SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDED 31 JULY 2022

This statement is made on behalf of Bellway p.l.c. (company number: 01372603) and Bellway Homes Limited (company number: 00670176) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes our slavery and human trafficking statement for the financial year ended 31 July 2022 (2021/22). This is the seventh statement made on behalf of Bellway p.l.c and Bellway Homes Limited (including Ashberry Homes, which is a trading division of Bellway Homes Limited) and sets out the steps that we continue to take to prevent modern slavery and human trafficking in our business and supply chains.

OUR STRUCTURE

Bellway p.l.c is the parent company of the Bellway Group (“Group”) which is made up of separately constituted and regulated legal entities providing housebuilding and related services. Bellway p.l.c is listed on the London Stock Exchange (LSE: BWY) and we are a FTSE 250 listed company. We are headquartered in Newcastle and operate exclusively in the United Kingdom.

OUR BUSINESS AND SUPPLY CHAINS

Evolving from a local family business to a FTSE 250 company, Bellway has been building exceptional quality new homes throughout the UK for more than 75 years, creating outstanding properties in desirable locations.

Bellway p.l.c. is the 4th largest house builder by volume in the United Kingdom. The main trading company of the Group is Bellway Homes Limited, which as at 31 July 2022 operates through twenty-two divisions.

The Group has around 3,000 employees and up to 8,500 sub-contracted workers on our sites at any one time.

Our supply chains include sub-contractors, merchants, material suppliers, design and environmental consultants and various other associated trades and services connected with housebuilding, most of whom we have a long-standing relationship with.

OUR APPROACH

As one of the UK's largest house builders, we work to the highest professional standards and comply with all laws, regulations and rules relevant to our business.

Our initiative “Better with Bellway” embodies our approach to responsible and sustainable business practices.

Our long-term approach to corporate responsibility, forms part of our “Better with Bellway” strategy and considers the interests of our diverse stakeholder groups to ensure we make positive social, environmental and economic contributions across our business.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery, servitude and forced compulsory labour or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to implementing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains or in any part of our business. Please click [here](#) to see our Anti-Slavery Policy.

We have an Anti-Slavery Compliance Team (which comprises of senior employees supported by a specialist external consultant) whose remit is to ensure that our Anti-Slavery Policy is complied with and that concerns or breaches are dealt with appropriately.

Our Anti-Slavery Compliance Team meets at least twice a year to:

- consider the level of risk to our business;
- review progress against the steps we are taking to ensure compliance; and
- consider any changes to our systems and controls to enhance compliance.

We also have a clear Whistleblowing Procedure which is available [here](#). If there are any concerns about any wrongdoing or breaches of law these concerns can be raised in confidence and without fear of disciplinary action or detriment.

Our policies are reviewed annually and updated as required.

DUE DILIGENCE PROCESSES

As part of our initiative to identify and mitigate risk in our supply chains, we continue to develop internal systems and controls to ensure our supply chain and those who work for us implement our policy. We:

- continue to be a signatory of The Construction Protocol, supporting us in our commitment to identify and tackle labour exploitation;
- carry-out 'right to work' checks on all new employees joining the company through our Group HR function;
- monitor working conditions on our sites through regular audits;
- continue to enhance our comprehensive employee verification checks and comply with all our obligations under applicable employment laws;
- continue to use posters, wallet cards and our staff newsletters to promote our confidential reporting facility where concerns, including any regarding slavery, human trafficking and illegal working, can be raised;
- have a zero tolerance procurement policy, which requires Group suppliers and sub-contractors to confirm that they comply with the Act. We have the right to audit as a standard condition within supplier and sub-contractor contracts;
- continue to review our procurement processes to consider what, if any, adjustments might be made to further reduce the level of risk of slavery and human trafficking in our supply chain; and
- make resources available to suppliers to support them in their compliance and staff training

through our membership of the Supply Chain Sustainability School.

RISK ASSESSMENT AND MEASURING EFFECTIVENESS

The main areas at risk of Modern Slavery in the Group are our workforce and supply chain.

We have assessed the overall risk of modern slavery to be low, however we recognise that the risk associated with subcontractors and suppliers is higher than that for our employees given a number of mitigations sit outside of our direct control. The risk of Modern Slavery occurring in any of these areas is being proactively managed through the Anti-Slavery Compliance Team and the measures described in this Statement.

There have been no material incidents of slavery, human trafficking or illegal working reported at any of our sites or offices, for the year ended 31st July 2022.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking.

To ensure all those in our supply chain comply with our values we require that our zero tolerance approach is communicated to all suppliers, sub-contractors and business partners at the outset of our business relationship and that it is reinforced, as appropriate, thereafter. We will cease to engage with individuals and organisations working on our behalf if they do not comply with our approach. As part of the onboarding process we require suppliers to sign up to our Anti-Slavery Policy, or provide a copy of their own policy.

PROGRESS IN 2022

Following the further steps outlined in our 2021 statement, we can report that for the period covered by this statement we have:

- rolled out the “toolbox talks”, in relation to Modern Slavery;
- conducted a modern slavery risk assessment of our sites and with the support of an subject matter expert conducted audits focusing on sub-contractor labour;
- performed a desktop audit of supplier and sub-contractor compliance within the finance system;
- continued to perform welfare checks at all our sites;
- launched a Safeguarding Policy to help identify and further support vulnerable employees and sub-contractors, which has been communicated to all employees;
- relaunched a poster campaign across each of our sites and offices to highlight modern slavery and what to do if there are concerns;
- Continuing with spot checks on right to work for workers on site;
- participated in sector wide working groups in order to champion best practice; and
- reviewed the annual supplier confirmation process around modern slavery statement compliance, and tightened our controls, as part of our ongoing commitment to best practice.

FURTHER STEPS AND TARGETS FOR THE YEAR AHEAD

We will continue to keep under review our internal processes to identify what further steps can

be taken to ensure that our obligations under the Act are met and that our Anti-Slavery Policy is effectively implemented and complied with, so as to ensure that there is no slavery or human trafficking in any part of our business.

Some of the specific measures we will be progressing during the financial year ending 31 July 2023 include:

- expanding upon our risk based site audits;
- continuing to perform welfare checks at each of our sites;
- continuing to host “toolbox talks” highlighting issues around modern slavery, and keep the content under review;
- continuing to participate in sector wide working groups in order to champion best practice;
- continue to monitor best practice and any proposed legislative changes in the area; and
- launching a mandatory new modern slavery e-learning module to inform our employees of the law and common risk factors.

We will review progress regularly and report in our next statement against the above.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 July 2022.

The statement was approved by the Board on 5 October 2022 and signed on behalf of the Board by Jason Honeyman, Chief Executive, Bellway p.l.c.

A handwritten signature in black ink that reads "Jason Honeyman". The signature is written in a cursive, flowing style.