

Modern Slavery and Human Trafficking Statement

1. Introduction

Barratt Developments PLC is committed to preventing, identifying, managing and mitigating modern slavery risk (including human rights violations, child and forced labour or human trafficking in any form), in our own operations and our supply chain.

Through our Building Sustainably framework we commit to 'Valuing human rights and championing fairness by preventing modern slavery within our supply chain and being a committed Living Wage Employer.' We uphold high quality labour standards and human rights within our value chain through a risk-based approach to procurement, supplier development and continuous improvement. We have policies and procedures in place that support the core values of the United Nations Universal Declaration of Human Rights and the UN Guiding Principles of Business and Human Rights.

This is Barratt's Modern Slavery and Human Trafficking Statement for the period 1st October 2023 – 30th September 2024 published in compliance with the Modern Slavery Act 2015 (the 'Act') within six months of our year end 30th June 2024. It sets out the steps taken by Barratt Developments PLC and the relevant subsidiaries or entities in which it has an interest (as are listed in the Appendix) (the '**Group**' or '**Barratt**'), to prevent human trafficking and slavery in our business and supply chain.

2. Responsibility

Our Chief Executive, on behalf of the Board, has responsibility for this statement and our Group Human Resources Director is the Executive Sponsor. Individual Group Functional Directors are accountable for compliance with the Act. Divisional Managing Directors are responsible for their local supplier relationships and compliance with the requirements of the Act. This statement will be reviewed and published annually on our PLC website.

The Group's Sustainability Committee, chaired by our Chief Executive and attended by three additional members of the Board meets quarterly. This Committee is responsible for:

- Scrutinising the sustainability strategy, which includes modern slavery risk;
- Ensuring our Building Sustainably Framework is embedded across the Group's operations; and
- Ensuring that the Group is mitigating its sustainability risks and leveraging opportunities in the short, medium and longer term.

This is supported by operational groups responsible for delivering on our commitments in their functional areas. For further details on our ESG governance structure see <https://www.barrattdevelopments.co.uk/building-sustainably/managing-sustainability>

In 2024 we convened our first internal Human Rights Committee - sponsored by our Group Sustainability Director and our Group Human Resources Director. Its role is to provide ongoing oversight of the human rights strategy which we are developing having launched our first Human Rights Policy.

3. About our business and supply chains

We are the country's leading sustainable national housebuilder with an annual turnover of £4.2bn. Our vision is to lead the future of housebuilding by putting customers at the heart of everything we do. Our principal activities comprise acquiring developable land, obtaining planning, and building high quality homes and communities. All of our operations and activities are UK-based. We operate 29 divisions. We directly employ 6,270¹ employees. In 2023/24 the business was responsible for 40,157 direct, indirect and induced employment opportunities, through the Group, its sub-contractors and suppliers. Including 353 graduates, apprentices and trainees on programmes. None of our directly employed or contracted workers are involved in seasonal work. Information about the diversity of our workforce can be found on our website (<https://www.barrattdevelopments.co.uk/building-sustainably/performance-data/data>).

We have a centralised procurement team that procures 95%² of our housebuilding materials through 160 Group construction materials agreements. Our divisions locally source the remaining 5% of materials. Around 90% of components centrally sourced are assembled and/or manufactured in the UK. 30% of materials contain some components that are sourced outside the UK.

Oregon Timber Frame Ltd is our timber frame manufacturing business, operating solely for the Group. It fulfils part of the Group's main housebuilding business's timber frame supply needs and has 8 timber suppliers. BD Living is a division within the Group, responsible for manufacturing and supplying wardrobes to our housebuilding business. Wilson Bowden Developments Limited is responsible for our commercial developments, which account for less than 2% of our revenue. Main contractors are used for the delivery of Wilson Bowden's commercial developments.

We have a diverse sub-contractor labour force (supporting over 5,000 sub-contractor companies across our divisions) including groundworkers and housebuilding trades. With the acquisition of Gladman Developments in January 2022, Barratt also operates a land promotion business under the Gladman brand.

Our supply chain is an integral part of our operations, and our success and reputation is linked to their performance and ethics. In 2023 we began mapping our supply chain locations to assess sustainability risk. Further information on our business and our supply chain management is available in our [2024 Integrated Annual Report and Accounts](#).

4. Policies and due diligence

4.1 Human Rights

Our Human Rights Policy commits us to upholding high quality labour standards and human rights across our value chain- including our direct and indirect impacts- taking a risk based approach. It encompasses the human rights of our employees, other persons working for us or on our behalf as well as those impacted by our operations. Work on the development of a framework to implement our human rights policy continued during the year including the development of due diligence tools to understand, mitigate and monitor

¹ Employee numbers (headcount) including Gladman, excluding sub-contractors at 30 June 2024.

² For low rise developments and excluding ground worker materials. For high rise developments – primarily in London – 45% of materials are procured through Group supply agreements.

employment risks for our agency labour, subcontractor workforce and materials supply chains.

4.2 Living Wage

Barratt is an accredited living wage employer. We are committed to ensuring all those who work directly or indirectly providing labour on our sites or within our offices are paid the real living wage as defined by the Living Wage Foundation. Our standard terms and conditions mandate the payment of the living wage within our supply chain. To support this, we implement spot checks by divisions on higher risk trades that work on our sites twice a year and put in place remediation feedback systems internally.. For those working in jurisdictions other than the UK, our expectation included within our contract requirements is that local statutory minimum wages are paid, however we do not currently audit this.

Thirty two business units were assessed in the June 2024 audit showing 4 disclosures of non-compliance to paying the Real Living Wage in the last 12 months, which the divisional teams are working actively with the subcontractors to resolve.

4.3 Sustainable Procurement Policy

Our Sustainable Procurement Policy specifies that suppliers must maintain their own ethical sourcing policies and apply these standards to their own business, across all of their workers, suppliers and any sub-contractors engaged in their supply chain. We seek to work with companies who share our principles and work according to our policies on health and safety, ethics, compliance and environment standards and who are prepared to commit themselves to meeting our requirements. We are committed to working with suppliers to support necessary improvements; however, we will also take action if suppliers and subcontractors do not meet our standards. We review compliance by carrying out risk assessments and periodic reviews. Suppliers are also obliged to provide evidence of their own policies and compliance as appropriate and provide the means for workers to report or discuss non-compliances confidentially. All our standard terms and conditions include relevant clauses for direct, temporary and agency contracts, construction materials suppliers and sub-contractors.

4.4 Purchasing Practices

We are committed to ensuring our business policies, procedures, requests and contracts do not place unnecessary demands on our suppliers, which may lead them to violate their obligations. This could include late payment, low payment, and high-pressure delivery demands. We adhere to the Prompt Payment Code to support the liquidity of our partners recognising that effective payment systems are critical to safeguarding people working in supply chains.

4.5 Additional policies:

The following Group policies support our commitment to eliminate Modern Slavery and Human Trafficking:

- Health and Safety
- Ethics
- Human Rights

5. Assessing the risk of modern slavery

We are reviewing how we risk assess our suppliers, subcontractor and labour agencies. This will take into account the potential for materials to come from high-risk countries; products and services using low skilled labour; reliance on temporary and transient labour; supply chain leverage; and the opportunity to do more.

We believe the business has a low overall risk of modern slavery in both our own operations and in our immediate supply chain. However, we are proactive in ensuring we are making our workforce, sub-contractors and suppliers aware of the potential risks, and are working to better understand the risks further down our supply chain.

5.1 Actions to mitigate risks

5.1.1 Direct, temporary and agency employment activities

We directly recruit and manage our employees; all of our employees are in the UK where, although modern slavery exists, it is less prevalent than some other countries and we have formalised people policies, processes and controls in place. All of our direct employees are, as an absolute minimum, paid in accordance with the UK living wage, or London living wage (as applicable).

We require all agencies and labour providers we directly engage to supply workers to be able to satisfy us that the people they supply have written employment contracts, have not had to pay for the opportunity to work in line with the 'employer pays principle', and are legally entitled to work in the UK. We continue to reiterate these requirements to agencies and labour providers on our preferred supplier list, and we advise new suppliers of these requirements at the outset. Through our online recruitment system launched in 2019 (Eploy), we introduced a new agency portal, which has increased the visibility of agency labour providers.

In order to achieve greater visibility, control and monitoring when recruiting for Labourers, Telehandler Operators, On-Books Bricklayers and Joiners, as part of the recruitment process roles must now be approved by the Regional Managing Directors where previously it was a local Construction Director. Worker reports including agency names are sent to the Executive Committee fortnightly.

5.1.2 Sub-contractors

We have informed all our sub-contractors of our requirements regarding modern slavery. We continue to provide information on the Act and its requirements on our commercial website which can be accessed here. Our risk assessment process undertaken by our divisional commercial teams identified three higher risk sub-contractor trades (security, landscaping and cleaning). We invited these trades to join the Supply Chain Sustainability School, (the 'School') in order to give them access to courses and training materials designed to help eliminate Modern Slavery and Forced Labour, which are available online. Further information regarding the School and our participation can be found in section 7 below.

5.1.3 Materials suppliers

We have informed our construction material suppliers of our requirements in relation to ethical sourcing. We have also reiterated the requirements of the Act at our national

supplier conference. Our early risk assessment processes identified low risk in our Tier 1 supply chain.

We are developing a supply chain mapping tool to gain better insight into 2nd and 3rd tier supply locations. This tool, in conjunction with an industry risk analysis that we began this year, will help to identify specific areas of risk exposure in order to carry out further due diligence.

This year we engaged an expert consultant to re-assess inherent human rights risks within our materials categories and will use the findings to determine our approach to implementing our due diligence framework.

5.1.4 IT Services

The two primary outsourced services for IT services are the disposal of IT assets and our IT helpdesk. The disposal of waste IT assets which involves low skill, low paid workers can present a higher modern slavery risk. As a minimum, we have contractual requirements in place to mitigate against this and going forward due diligence checks will be implemented to ensure the measures our supplier has in place are appropriate to tackle this risk. Our IT helpdesk is located in Romania and is operated by highly skilled professionals, and therefore at low risk of modern slavery.

6. Whistleblowing

Employees, sub-contractors and suppliers, both past and present, who become aware of possible improper, unethical or illegal behaviour are encouraged to raise the matter with their manager, the Group Head of Legal or other assigned point of contact or alternatively use our confidential and whistleblowing service, (Safecall: 0800 915 1571 or barratt@safecall.co.uk), available 24 hours a day, seven days a week. We have had no instances of whistleblowing regarding modern slavery in the reporting year.

7. Training and awareness

We mandate e-learning training to all Directors and Heads of Function, and specific roles within Group and Divisional teams. This training was updated and relaunched this year, aimed at a wider audience than before, and covers the definitions of modern slavery, why it matters to the Group and how to spot the signs and report concerns. It also aims to aid in understanding roles and responsibility in relation to modern slavery and labour exploitation. Content is tailored to the procurement, HR, commercial and construction function groups.

Human rights and modern slavery are key issues within our Building Sustainably framework, and as such we include awareness and training on modern slavery as part of our wider framework updates across the whole Group throughout the year. Awareness posters to help site teams spot the signs of modern slavery and to provide signposting and an understanding of employment rights for potential victims are displayed on all site welfare cabins.

Through our partnership with the Supply Chain School we have collaborated with a number of representatives from the construction industry to establish various learning materials for the sector's supply chain. We have mandated and successfully signed up 147 of our centrally procured construction materials suppliers as members of the School so that they can access these training materials. We receive monthly reports on progress - 114 of these have achieved the highest attainment level on the Supply Chain School

sustainability matrix in relation to modern slavery. We are reviewing how we enrol sub-contractors to engage with the school as part of the wider human rights programme, however to date 12% of our top 100 sub-contractors by spend are active members of the School.

Following the sponsorship of the project with the Supply Chain Sustainability School to better understand the issues involved with the sourcing of solar panels, we have used the guidance document to develop our thinking and will incorporate the outputs in our revised due diligence process.

8. Key performance indicators

The development of our human rights framework will entail a wholesale review of our approach to broad human rights impacts including modern slavery. This will involve developing the necessary tools and capabilities for carrying out risk assessments and due diligence in relation to salient human rights issues and a means of monitoring performance through associated KPIs which when developed will be published in our next statement.

Performance against KPIs is set out below.

KPI	Performance Data
The number of Directors and Function Heads, Contracts Managers, Group Procurement Team and Group Commercial team trained on modern slavery through a tailored e-learning module.	459 out of 481 as of 25th August 2024

This statement is made pursuant to section 54 of the Modern Slavery Act, and was approved by the Board of Barratt Developments PLC on 22 October 2024 and is signed on its behalf by:

David Thomas

Chief Executive

22 October 2024

Appendix

Companies and entities within the Barratt Developments PLC organisational structure, on whose behalf this statement is made and which form part of the Barratt Developments PLC business or supply chain:

- BDW Trading Limited
- David Wilson Homes Limited
- Wilson Bowden Developments Limited
- Oregon Timber Frame Ltd
- Gladman Developments Limited
- Brooklands Milton Keynes LLP
- Blackhorse Road LLP
- Harrow View LLP
- Fulham Wharf LLP
- Wichelstowe LLP
- Barratt Metropolitan LLP



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