



# **Anti-Fraud, Bribery and Corruption Policy**

## **March 2026**

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**Executive Sponsor:** Simon Scougall, Chief Commercial Officer

**Approved by the Audit Committee of Bellway p.l.c. on 16 March 2026**  
**Approved by the Main Board of Bellway p.l.c. on 17 March 2026**

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## Overview

### 1.1 Policy Introduction

Bellway operates a strict zero-tolerance approach to fraud, bribery and corruption. In line with the Bribery Act 2010 and the Economic Crime and Corporate Transparency Act 2023, Bellway is required to maintain and enforce reasonable and proportionate procedures to prevent associated persons from committing fraud or bribery for the benefit of the Group. As a UK listed company, Bellway p.l.c. is bound by the laws of the UK, including the Economic Crime and Corporate Transparency Act 2023 and the Bribery Act 2010. This Policy, which has been approved by the Board of Bellway p.l.c., applies to all divisions, companies and entities within Bellway as well as any subsidiaries, joint ventures and consortium arrangements. In addition, this Policy must be understood and followed by anyone who acts for Bellway, either as an employee or as a third party. The Board's Statement of Policy is at **Appendix F**.

Fraud and bribery is punishable for individuals through fines, imprisonment for up to 10 years', or both. If we are found as a Company to have taken part in fraud and bribery, we could face an unlimited fine, restrictions could be placed on our business, and our reputation severely damaged. We therefore take our legal responsibilities very seriously.

Should you have any questions about the content of this Policy, please contact Dale Armstrong, Group Legal Director and the Anti-Fraud Bribery and Corruption Compliance Officer under this Policy, on 0191 217 0717 or [dale.armstrong@bellway.co.uk](mailto:dale.armstrong@bellway.co.uk).

### 1.2 Policy Content

This policy document contains the following sections:

- Definitions and Explanations
- Key Principles
- Policy Statements and Expected Procedures and Controls
- Appendices – Supporting Documents and Forms

## 2 Definitions and Explanations

### 2.1 What is Fraud?

Fraud is an act committed dishonestly and with the intention to make a gain for yourself or another, or to cause a loss to another. Fraud may be committed even if no benefit is ultimately obtained. It is important to note that fraud can be committed in a variety of ways, with conduct potentially engaging a number of different offences. In the UK, a range of specified fraud offences are set out in the Fraud Act 2006, Companies Act 2006 and Theft Act 1968 (amongst others) and include:

- false representation
- failing to disclose information
- abuse of position
- participating in fraudulent business
- obtaining services dishonestly
- cheating the public revenue
- false accounting
- false statements by company directors
- participating in fraudulent business carried on by sole trader

and

- fraudulent trading

### 2.2 The Economic Crime and Corporate Transparency Act 2023 (ECCTA)

Under the ECCTA 2023, a large organisation (which would include Bellway p.l.c. and its subsidiaries and joint ventures) commits the offence of 'failure to prevent fraud' if an associated person commits one of a number of specified fraud offences intending to benefit the organisation. The large organisation has a defence if it can show that it had reasonable fraud prevention procedures in place.

An organisation does not need to receive a benefit for the offence to apply. The offence is engaged as soon as the underlying fraud is committed, even if no gain is yet, or ever, realised. It is sufficient that the fraud was carried out with the intention of benefitting the organisation.

Further, the intention to benefit the organisation does not have to be the sole or dominant motivation of the fraud. The benefit may also be financial or non-financial (such as an unfair business advantage).

### 2.3 Section 196 of ECCTA

Section 196 of the ECCTA introduces a separate basis on which an organisation may be held criminally liable. Under this provision, if a senior manager acting within the actual or apparent scope of their authority commits a relevant economic crime, the organisation itself is treated as having committed that offence. This applies regardless of whether the organisation had compliance policies, controls, or prevention procedures in place, as ECCTA attributes the senior manager's misconduct directly to the organisation. The term "senior manager" is interpreted broadly and includes individuals who play a significant role in

directing or managing Bellway's activities. Where such individuals commit a relevant economic offence - including fraud - the organisation may be prosecuted and subject to penalties. Section 196 sits alongside, and operates independently from, the "failure to prevent fraud" offence in Section 199.

## **2.4 What is Bribery and Corruption?**

The terms "bribery" and "corruption" are often used interchangeably. Corruption refers to a wide range of corrupt activities, such as dishonesty, fraud, extortion and abuse of public office, all of which Bellway does not tolerate. Bribery is a common form of corruption. This Policy deals with bribery specifically, but its principles extend to corrupt behaviour that may not strictly be classed as bribery, but which, nevertheless, is not tolerated at Bellway.

A bribe is defined as a "financial or other advantage" made with the intention to:

- obtain or retain business or an advantage in the conduct of business

and/or

- induce or award improper conduct (such as breach of an expectation that the recipient will act in good faith or impartially)

There is no strict definition of "financial or other advantage".

The link between the advantage sought and the improper conduct may take one or more of three forms:

- a person being bribed may intend the improper conduct to follow as a consequence of the request, agreement to receive or the acceptance of the advantage
- receiving, agreeing to receive or accepting the advantage may itself amount to improper performance
- the advantage may be the reward for the improper performance

## **2.5 The Bribery Act 2010**

Under the Bribery Act 2010, it is an offence to:

- offer, promise or give a bribe
- request, agree to receive or accept a bribe
- bribe a public official (this covers any person performing a public function)
- (for companies) fail to prevent an associated person from offering, promising or giving a bribe.. An "associated" person is anyone that performs services for or on behalf of a commercial organisation, such as employees or agents and, in some cases, subsidiaries and other parties they work with

A bribe does not have to involve the exchange of cash and bribery does not just affect bribes to or from public officials but also includes bribes between private persons or businesses.

Bribery may involve facilitation payments or "kickbacks". Bellway does not make and will not accept these types of payments. Facilitation payments (also known as "speed" or "grease" payments) are typically small, unofficial payments made to secure or expedite a

routine action. These are often, but not always, associated with public officials and particularly foreign public officials.

## **2.6 Penalties**

Any individual found guilty of a fraud or bribery offence may face imprisonment for a maximum of 10 years and/or an unlimited fine.

The corporate offences are strict liability offences which also carry an unlimited fine. This means that the intention of improper performance does not need to be proven. If convicted, Bellway would face the possibility of being excluded from tender processes for any public sector contracts as a result of having a fraud or bribery conviction.

## **2.7 Responsibilities**

This Policy applies to all Bellway employees, workers, officers, directors, consultants, contractors, agency staff and third party performing services for or on behalf of Bellway. Every individual is personally responsible for complying with this Policy and for upholding Bellway's zero-tolerance approach to fraud, bribery and corruption.

Divisional Managing Directors and Group Office heads are additionally responsible for ensuring that appropriate controls, procedures and training are implemented within their areas.

The Chief Commercial Officer, as Executive Sponsor, will review and monitor the scope of and compliance with the Policy on at least an annual basis in conjunction with the Group Risk Director. Changes will be made as required to the Policy, which will be communicated to all employees and business partners. The Anti-Fraud, Bribery and Corruption Compliance Officer will monitor the Policy on an ongoing basis and along with the Audit Committee of the Board of Bellway p.l.c., will review Policy compliance via the annual and half-year declarations completed by all divisions and Group Office.

The Board of Bellway p.l.c. is responsible for approving the Policy.

## **3 Key Principles**

### **3.1 Integrity**

Employees, workers, contractors, consultants and all associated persons must not act in a way that could undermine or give risk to allegations or doubts about their integrity or commitment to a zero-tolerance approach to fraud, bribery and corruption. Employees and business partners must conduct all business relationships fairly, honestly and “at arms’ length”.

### **3.2 Transparency**

Employees and business partners must exercise extreme care to ensure their business dealings are clear and ethical. This is particularly important in partnerships, especially those with agents, intermediaries and our supply chain. This includes maintaining complete, accurate and contemporaneous records of decisions, approvals and payments.

### **3.3 Reporting**

Employees and business partners must immediately report any suspected business wrongdoing. This can be via our confidential hotline “SpeakUp”, or by reporting it directly to the Anti-Fraud, Bribery and Corruption Compliance Officer. We also have a Whistleblowing Procedure in place which provides additional information on “SpeakUp” and options with regards to reporting business wrongdoing.

If preferred, employees may report any suspicions directly to their line manager. If an employee reports a matter to their line manager, the line manager must promptly report the matter to either the divisional Managing Directors or to the Anti-Fraud, Bribery and Corruption Compliance Officer.

All employees and business partners are assured that they will not suffer any adverse consequences for refusing to take part in fraud, bribery or corruption, or for reporting suspected business wrongdoing, including fraud and bribery.

### **3.4 Training**

Training will be provided to all employees to facilitate understanding of the Policy. All employees must complete this training. New employees will be provided with access to the training as part of their induction to Bellway.

As is considered necessary, refresher training will be provided either when there are significant changes to the Policy or where compliance with the Policy has been found to be below expectations.

### **3.5 Actions**

We will act firmly in respect of any failure to comply with this Policy. Any failure to comply by employees may result in dismissal and may also result in criminal prosecution and/or civil proceedings.

Any failure to comply by business partners will mean that the contractual agreements may be terminated, and we will avoid doing business with that partner in the future.

### **3.6 Annual and Half Year Declaration**

This Policy forms part of the annual and half year certification exercise whereby all divisions, as well as Group Office, certify that key policies have been complied with. As part of this certification, divisions and Group Office must be able to demonstrate compliance through keeping of appropriate records.

### **3.7 References**

Reference should be made to other relevant Bellway policies, procedures and documents as appropriate and as set out within the content of this Policy. The relevant Group policies, procedures and documents in this instance are:

- Whistleblowing Policy and Procedure
- Commercial Policy and Purchasing Procedures
- Land Acquisition Manual
- Expenses Policy
- Share Dealing Policy
- Employee Benefits
- Disciplinary Procedure
- Charity Plan
- Corporate Tax Offence Policy
- Accounting Manual
- Anti-Money Laundering Policy
- Sales and NHQC Procedures

## **4 Policy Statements and Expected Procedures and Controls**

Bellway operates a zero-tolerance approach to fraud, bribery and corruption. Our zero-tolerance approach extends to all our business dealings and transactions and sets out the standards expected of our employees and other individuals who work for and with us. Individuals who work for and with us are referred to as business partners within this Policy document. The Board's Statement of Policy which should be sent to business partners is at **Appendix F**.

Our approach to fraud, bribery and corruption seeks to ensure that all our business activities are genuine and ethical, and we expect all employees and other individuals who work for and with us to maintain the highest standards of integrity and conduct in all business dealings.

Specific policy statements for processes considered to be "susceptible" to bribery and corruption (which can themselves be a form of fraud) are set out in sections 4.1 to 4.14 below, along with expected procedures and controls, including required approvals.

### **4.1 Land Acquisition and the Use of Land Agents**

#### **4.1.1 Policy Statement**

There is an increased risk from a bribery and corruption perspective in connection with land acquisition. It is Bellway's policy to always comply with the requirements of the Bribery Act 2010 whilst also avoiding any situation where our commercial position is unfairly compromised.

Due diligence is required to be undertaken on all land agents/intermediaries so as to ensure that the risk associated with any potential transaction is fully understood. Any service provided by an agent must be fully documented and associated fees must be approved in advance. The agent must also confirm their agreement to and compliance with Bellway's Anti-Fraud, Bribery and Corruption Policy wording.

Marketing/resale fees payable to a vendor's agent are permitted in limited circumstances and only where the arrangement is approved. The agent should only be appointed if each of the following circumstances apply:

- the resale fees are no higher than the standard market rate and are payable on standard market terms
- the agent provides a genuine and substantial resale service
- the appointment is part of our efforts to build a relationship with the agent in the broader context of the sale
- the agreement appointing the agent for resales is in writing via a formal service agreement and contains all required Anti-Bribery and Corruption Policy wording
- the agreement does not contain a break clause allowing either party to terminate the resale arrangements for a fee

Fees must not be unreasonable or excessive. As a guide, any fee for the introduction of a site which is > 2% of the land purchase price, is considered to be excessive.

In any event, no fee should be payable in excess of £250,000 without the express prior written approval of the Chief Commercial Officer.

#### 4.1.2 Expected Procedures and Controls

Expected processes and controls with regards to land acquisition and the use of land agents are set out below:

- Due diligence must be carried out before appointing or re-appointing agents/intermediaries using the form: “Proposed Appointment of Agent – Due Diligence (Land) (**Appendix A**)”. Relevant and required actions must be taken according to the risk rating which results from the completion of the form
- If following due diligence the agent/intermediary can be appointed, the pro forma wording at **Appendix B**, must be used to agree the fee and services in writing with the agent. **Only Managing Directors or Regional Chairs have the authority to approve agents’ fees, except in the case of marketing or resale fees which only Regional Chairs can approve.** The letter MUST include the standard wording on the Bribery Act. A copy of the agreement signed by the agent must be returned to Bellway, included in the land pack and also sent with the appropriate Request to Pay Agent’s Fees form (**Appendix C**) depending on whether the acquisition is immediate or strategic land.
- If a payment is to be made to an agent who is also acting for the vendor and such a payment is not for a resale service, this should be documented as an introduction fee. Any fee payable to a vendor’s agent must be approved by the vendor, such approval to be in writing and addressed to Bellway Homes Limited
- A specific section on Anti-Fraud, Bribery and Corruption Policy Compliance, including all supporting documentation, must be included in all land packs. If no agent is being used, this should be stated in the relevant section of the land pack
- A receipted VAT invoice, addressed to Bellway Homes Limited, must be obtained from the agent for any payment to be made
- The payment of all agents’ fees must be made via Head Office using the appropriate Request to Pay Agent’s Fees form (**Appendix C**) as follows;
  - Immediate Land
    - The form must be signed by the divisional Managing Director, the divisional Finance Director and the Regional Chair. Approved requests for payment should then be sent to the Executive PA to the Chief Commercial Officer with all supporting documents
  - Strategic Land
    - The form must be signed by the Group Strategic Land Director and the Regional Strategic Land Director. Approved requests for payment should then be sent to the Executive PA to the Chief Commercial Officer with all supporting documents
- Payment cannot be authorised unless the correct form has been correctly completed and signed and all required documents are attached

## 4.2 Procurement

### 4.2.1 Policy Statement

All procurement activities, including materials, sub-contract work, services, and consulting, must be undertaken in a manner which limits the possibility of fraud, bribery and corruption. “Special” arrangements, contracts, deals or payments must not be set up or

made to any supplier or subcontractor where the intention is to induce illegal or inappropriate behaviour.

#### **4.2.2 Expected Procedures and Controls**

The requirements of all Group Commercial Policies and Procedures must be complied with for all aspects of procurement. Of particular relevance to this Policy:

- All orders and contracts must be the subject of a tender process
- Due diligence must be carried out before the appointment or re-appointment of significant suppliers, contractors, sub-contractors and other partners who carry out business on the Bellway's behalf. The Procurement Due Diligence Checklist (**Appendix D**) should be used and kept on the tender file. The degree of due diligence can vary depending on the perceived risk.
- Tender analyses and decisions, orders and variations to orders must be approved in line with the financial limits specified in the Group Delegations of Authority.

### **4.3 Sales**

#### **4.3.1 Policy Statement**

All employees and business partners, especially sales personnel must take great care when dealing with customers, estate agents, advertising agencies, investors and providers of show-home furniture. There is a risk of impropriety and so no private payments or favours are to be accepted from any of the above sources.

#### **4.3.2 Expected Procedures and Controls for Sales**

There are no specific processes and controls with regards to sales in relation to this Policy. Sales staff are required to comply with all aspects of this Policy and also to comply with Sales and NHQC policies and procedures.

### **4.4 Public Sector, Government and Local Authority Officials**

#### **4.4.1 Policy Statement**

Great care must be taken when dealing with public sector, government and local authority officials (e.g. planning activities). There must be no situations where employees or business partners may be seen to be trying to unduly influence those from the public sector, government or local authority to act in a way which is favourable to Bellway by the use of excessive or inappropriate means.

Any form of "planning gain" provided in connection with the award of a planning consent, which benefits a local authority or council must always be within the terms of Section 106 of the Town and Country Planning Act 1990, the Community and Infrastructure Levy (Amendment) Regulations 2011, or other relevant legislation.

In addition, extreme care should be taken by those charged with reaching "compromises" with objectors related to any planning objections to our developments.

#### **4.4.2 Expected Procedures and Controls**

Any planning gain or compromise reached with objectors must be approved by the Divisional Land Director and the Managing Director and held on file at the divisions.

## **4.5 Joint Ventures, Collaborations and Subsidiaries**

### **4.5.1 Policy Statement**

As Bellway could be implicated in fraud, bribery or corruption if a joint venture (JV) or collaboration was involved in such activities, it is our policy that all JVs and collaboration members are made clearly aware of our zero-tolerance approach to fraud, bribery and corruption. Communication with all JVs and collaboration members should take place to ensure this approach is understood.

All subsidiary undertakings, whether 100% owned or not, must adhere to this Policy.

### **4.5.2 Expected Procedures and Controls**

For all JVs and collaborations:

- As part of the initial due diligence process, the anti-fraud and anti-bribery policies of the JV company or and collaboration members must be obtained and retained by Bellway
- The JV company or collaboration members must be notified, in writing, of our zero-tolerance approach to fraud and bribery
- The JV company or collaboration members must adopt Bellway's Anti-Fraud, Bribery and Corruption Policy, or an equivalent framework and provide reasonable evidence of compliance (e.g., certifications, training records or policy attestations) upon request

## **4.6 Charitable Donations and Sponsorships**

### **4.6.1 Policy Statement**

It is our policy to make charitable donations and sponsorships when appropriate to do so. There must be no conflict of interest in making the charitable donation or providing the sponsorship and they must not be made when they could be perceived as unduly influencing a business decision or activity.

Charitable donations must be made only for philanthropic purposes and should be of no financial or other benefit. Sponsorships must only be made for business promotional objectives.

### **4.6.2 Expected Procedures and Controls**

All charitable donations must be made in accordance with the Charity Plan and must be approved by the relevant divisional Finance Director prior to payment being made.

All sponsorships must be approved by the Chief Commercial Officer, prior to the commitment of sponsorship being made.

## **4.7 Political Contributions, Donations, Advice and Lobbying**

### **4.7.1 Policy Statement**

We do not make political contributions or donations and we do not make use of political advisers or political lobbying groups, other than at the local level in the pursuit of planning consents.

Bellway is a member of the Home Builders Federation (HBF) and is apolitical and does not support any political party or organisation in any way.

#### 4.7.2 Expected Procedures and Controls

We do not make political contributions or donations and we do not make use of political advisers or political lobbying groups, other than at the local level in the pursuit of planning consents. No specific processes or controls have been set out relating to political contributions, donations, advice and lobbying.

### 4.8 Gifts and Corporate Hospitality

#### 4.8.1 Policy Statement

Bellway permits both the giving and receiving of good faith, reasonable and proportionate gifts, hospitality and entertaining in the course of doing business.

We do not permit the giving or receiving of any gifts, hospitality or entertaining which is perceived, expected or intended to improperly gain or retain business or a business advantage, or to reward a business advantage already given.

Specifically, the following **must never be offered or accepted**:

- Cash/vouchers/extravagant gifts
- Repeat or regular gifts or hospitality by one employee to/from the same source. The maximum number of instances of gifts or hospitality interactions by an employee with the same source over a 12-month period should be three. Routine working business lunches/dinners are excluded
- Gifts of a bulk nature i.e. to multiple people in one organisation
- Gifts to or from any NHBC employee
- Hospitality exceeding £1,250 (corporate hospitality at recognised sporting/exhibition events are not subject to this cap provided the hospitality is reasonable and proportionate).
- Hospitality events which are to take place overseas must be expressly approved by the Chief Commercial Officer in advance.

Gifts include food, drink or other corporate hospitality if the host is not present.

#### 4.8.2 Expected Procedures and Controls – Divisions

For divisions, the following processes and controls must be in place:

- **ALL GIFTS RECEIVED MUST NOT BE KEPT BY THE INDIVIDUAL** and must be used for the benefit of Bellway employees as a whole. Gifts received should be put into a staff raffle or donated as charity raffle prizes
- All hospitality ***received*** which are > **£20** must be approved by the relevant Head of Department. Hospitality which is < **£20** is regarded as de minimis and need not be declared or approved provided the hospitality is given and received in compliance with the Policy statement at 4.8.1 above
- Gifts and hospitality ***received*** by the Managing Director must be approved by the Regional Chair.
- The Approval and Reporting of Gifts, Corporate Hospitality/Entertainment Form (**Appendix E**) must be used to obtain approval and must be filed at the division
- All gifts received regardless of value, and all hospitality ***received*** =, must be recorded on the **Gift and Hospitality Register – Received**, which must detail:
  - Recipient

- Date
  - Description of Gift/Event
  - Third Party Company and Third Party Contact
  - Value
  - Where the gift has been donated to
  - Approver and Date of Approval
- The **Gift and Hospitality Register – Received** must be maintained at the division, included in every divisional board pack, reviewed on a quarterly basis by the Regional Chair and be available for audit as and when required
  - A **Listing of Declined Gifts and Hospitality** must also be maintained at the division, noting the employee who declined it, date, description of the gift/event and the third party company and contact. This List should also be included in every divisional board pack, reviewed on a quarterly basis by the Regional Chair and be available for audit as and when required
  - All gifts and hospitality **given** must be approved by the Managing Director
  - If the Managing Director is giving the gift or attending the hospitality being given, approval must be obtained from the Regional Chair
  - The Approval and Reporting of Gifts, Corporate Hospitality/Entertainment Form (**Appendix E**) must be used to obtain approval and must be filed at the division
  - All gifts and hospitality **given** must be recorded on the **Gift and Hospitality Register – Given**, which must detail:
    - Host/Gift Given By
    - Date
    - Description of Gift/Event
    - Third Party Recipient(s) and Third Party Company(ies)
    - Value
    - Approver and Date of Approval
  - The **Gift and Hospitality Register – Given** must be maintained at the division, included in every divisional board pack, reviewed on a quarterly basis by the Regional Chair and be available for audit as and when required

#### 4.8.3 Expected Procedures and Controls – Group Office, Including Regional Chair

For the purposes of gifts and hospitality, Regional Chairs must comply with these Group Office expected procedure and controls. For Group Office, including Regional Chairs, the following processes and controls must be in place:

- **ANY GIFTS RECEIVED MUST NOT BE KEPT BY THE INDIVIDUAL** and must be used for the benefit of Bellway employees as a whole. Gifts received should be put into a staff raffle or donated as charity raffle prizes
- All hospitality **received** which is > £20 must be approved by the relevant Head of Department or the employee's line manager for senior employees. Hospitality which is < £20 is regarded as de minimis and need not be declared/approved provided the hospitality is given and received in compliance with the Policy statement at 4.8.1 above
- Gifts and hospitality **received** by Regional Chairs must be approved by the Chief Commercial Officer
- Gifts and hospitality **received** by the Group CEO must be approved by the Chief Commercial Officer

- The Approval and Reporting of Gifts, Corporate Hospitality/Entertainment Form (**Appendix E**) must be used to obtain approval
- All gifts received regardless of value, and hospitality **received** which is > £20, must be recorded on the **Gift and Hospitality Register – Received**, which must detail:
  - Recipient
  - Date
  - Description of Gift/Event
  - Third Party Company and Third Party Contact
  - Value
  - Where the gift has been donated to
  - Approver and Date of Approval
- The **Gift and Hospitality Register – Received** must be maintained at Group Office, reviewed on an ongoing basis by Chief Commercial Officer and be available for audit as and when required
- A **Listing of Declined Gifts and Hospitality** must also be maintained at Group Office, noting the employee who declined it, date, description of the gift/event and the third party company and contact. This List must be reviewed on an ongoing basis by the Chief Commercial Officer and be available for audit as and when required
- All gifts and hospitality **given** must be approved by the relevant Head of Department
- If the Regional Chairs are **giving** the gift or attending the hospitality being given, approval must be obtained from the Chief Commercial Officer
- If the Group CEO is **giving** the gift or attending the hospitality being given, this must be approved by the Chief Commercial Officer
- The Approval and Reporting of Gifts, Corporate Hospitality/Entertainment Form (**Appendix E**) must be used to obtain approval
- All gifts and hospitality **given** must be recorded on the **Gift and Hospitality Register – Given**, which must detail:
  - Host/Gift Given By
  - Date
  - Description of Gift/Event
  - Third Party Recipient(s) and Third Party Company(ies)
  - Value
  - Approver and Date of Approval
- The **Gift and Hospitality Register – Given** should be maintained at Group Office, reviewed on an ongoing basis by the Chief Commercial Officer and be available for audit as and when required

## 4.9 Expenses Paid by or to Third Parties

### 4.9.1 Policy Statement

Expenses in these contexts are:

- the payment, provision or reimbursement by a third party of travel or other related expenses incurred by a division, employee or business partner
- the receipt, provision or reimbursement by Bellway of travel or other related expenses incurred by a prospective client, customer or business partner

Such situations are permitted by Bellway, so long as they are low value and proportionate and do not occur prior to significant business decisions being taken.

#### 4.9.2 Expected Procedures and Controls

All such expenditure must be low value and proportionate and must not occur prior to significant business decisions being taken. All such items of expenditure must be documented and approved by the Managing Director or the Chief Commercial Officer if relating to a Group Office employee or a Regional Chair.

### 4.10 Private Works and Purchase of Homes by Employees and Connected Persons

#### 4.10.1 Private Works

Employees must obtain written approval, using the form in **Appendix G**, in advance from Head Office before use of the following for private purposes:

- a company supplier of services and/or materials
- a sub-contractor operating under contract or tendering for a contract
- company employees either during or outside work hours
- company materials

In cases where an employee is purchasing a new property from Bellway, and is using company suppliers for materials or sub-contractors for items to be fitted/installed in the property before completion, these must be included on the Personal Use of Bellway Suppliers and Sub-contractors Form (see **Appendix G**) and must be charged at the full Bellway rate. The employee must pay the subcontractor or supplier directly for the works or services.

#### 4.10.2 Purchase of Homes

All purchases of Bellway homes or part exchange homes by employees, relatives of employees, partners, friends and other connected persons must be approved prior to the property being reserved, using the form in **Appendix H**. Failure to comply with this may result in disciplinary action being taken.

Any extras and variations will be charged at the full normal arms' length rate i.e. without discount.

#### 4.10.3 Expected Procedures and Controls

Employees are required to obtain approval in writing using one or both of the forms in **Appendices G and H** before orders are formally placed.

Employees are required to present a detailed quote from the supplier or sub-contractor alongside the form in **Appendix G**. In addition, confirmation must be obtained from the suppliers or sub-contractor that the price is no less than what Bellway would pay.

### 4.11 Conflicts of Interest

#### 4.11.1 Policy Statement

A conflict of interest is any situation where an individual's loyalties may be at odds with their duties to Bellway. A conflict may arise where an individual's relationships (personal or professional), impairs or appears to impair, their ability to:

- Make fair and objective decisions when performing their job; or
- act in Bellway's best interests

All employees are expected at all times to act in our best interest and to exercise sound judgement around any potential conflict of interest situation.

Employees must avoid situations where they, or Bellway, could be open to suspicion, of dishonesty or favouritism or lack of transparency. Any potential or actual conflicts of interest must be declared as soon as they are known.

#### **4.11.2 Expected Procedures and Controls**

Any potential or actual conflicts of interest must be declared as soon as they are known as set out in employment contracts and the Managing Director, Regional Chair or Chief Commercial Officer must keep a register of all declared conflicts as appropriate.

### **4.12 Contracts**

#### **4.12.1 Policy Statement**

It is our policy to ensure that all contractual documentation for the following contains standard anti-fraud, bribery and corruption wording, which sets out our zero-tolerance approach to fraud, bribery and corruption:

- contractor/sub-contractor agreements
- purchase of material agreements
- bonds
- consultant appointments
- framework agreements
- miscellaneous agreements
- contracts of employment

#### **4.12.2 Expected Procedures and Controls**

It is our policy to ensure that all contractual documentation contains standard anti-fraud, bribery and corruption wording, which sets out our zero-tolerance approach to fraud, bribery and corruption. Standard wording is stored on the Intranet under Legal/Construction Precedents/Section A/A12 Clause 38, which must be used.

### **4.13 Reward**

#### **4.13.1 Policy Statement**

Reward structures for employees must be set so as to ensure they do not encourage and are not susceptible to fraud, bribery and corruption and all business expenses must be claimed in accordance with the Group Expenses Policy.

#### **4.13.2 Expected Procedures and Controls**

All reward structures for employees must be reviewed to ensure they do not encourage and are not susceptible to fraud, bribery and corruption. All expense claims must be approved by the appropriate Head of Department.

## **4.14 Employees**

### **4.14.1 Policy Statement**

Recruitment processes must provide adequate comfort about the suitability of people being recruited. All employees must be made aware of and be required to comply with Bellway's policy on and approach to fraud, bribery and corruption.

A failure to comply with the Anti-Fraud, Bribery and Corruption Policy by an employee will be considered a breach of the employment contract, in addition to any criminal justice procedures if criminal offences are committed.

### **4.14.2 Expected Procedures and Controls**

When recruiting employees, background and previous employer reference checks must always be performed.

All employees must be made aware of and be required to comply with Bellway's policy on and approach to fraud, bribery and corruption and the Anti-Fraud, Bribery and Corruption Policy must be available and accessible to all employees at all times.

## Appendix A - Proposed Appointment of Agent – Due Diligence (Land)



### ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY PROPOSED APPOINTMENT OF AGENT – DUE DILIGENCE (LAND)

**NOTE:** The questions listed in Section A should be considered prior to the appointment or re-appointment of an agent.  
The questions listed in Section B should be considered before the re-appointment of an agent or before fees are paid for the first time.

Question / Information Request	Answer	Risk Indicator (if “Yes”)
<b>SECTION A – GENERAL</b>		
1.	Have the following been obtained / carried out?	N/A
	a) Internet searches	Yes / No
	b) Press searches	Yes / No
	c) References (verbal/written)	Yes / No
	d) Other indirect enquiries	Yes / No
2.	Did the Agent approach Bellway and offer to perform the services (as opposed to Bellway approaching the Agent)?	
	Was the Agent recommended to us by some other party?	
3.	Does the Agent operate without its own anti-fraud, bribery and corruption policies?	
	Did the Agent resist sharing its policies with Bellway?	
4.	Have any Bellway employees declared a conflict of interest in respect of the Agent’s appointment? If yes, please give details.	
	Yes / No	
	_____ _____ _____	
5.	What services will the Agent perform? Are they substantive, or limited to providing market intelligence?	<i>If services are limited to providing market intelligence</i>
	_____	
	_____ _____	
6.	Does the Agent assist with obtaining licences, permits, or other regulatory clearances?	
7.	Where the Agent is a company, is that company a “shell company” (i.e. a company with no real assets or operations of its own) or does it have some other complex corporate structure (e.g. a trust without information about the beneficiary)?	
8.	Where the Agent is a company, is the identity of the ultimate owner/controller unclear?	
	Did the Agent resist providing details of its ownership structure?	
9.	Will the Agent be entitled to receive large or unusual payments which are not in line with market rates, either on completion or upfront?	
	Did the Agent object to having its appointment documents in writing?	
	<i>Note: Generally, Head Office should be consulted at an early stage on any fee discussion. Fees in excess of 2% are likely to be regarded as excessive.</i>	

Question / Information Request	Answer	Risk Indicator (if "Yes")	
<b>10</b>	Does the Agent have a criminal record or has it otherwise been the subject of adverse judicial or regulatory findings?	Yes / No	
<b>11</b>	Did the searches carried out in Question 1 above raise any concerns, for example, reputational concerns in relation to alleged incidents of fraud, bribery, corruption, fraud, or similar? If yes, please give details.	Yes / No _____ _____ _____	
<b>12</b>	Is the Agent able to influence public officials, or does the Agent claim that he can help secure a site because he "knows the right people"?	Yes / No	
<b>13</b>	Does the Agent offer or receive frequent and/or expensive hospitality or gifts, either related to Bellway or more generally?	Yes / No	
<b>SECTION B – RE-APPOINTMENT / BEFORE PAYMENT OF FEES</b>			
<b>14</b>	How long has Bellway had a relationship with the Agent? When was the relationship last reviewed, and when was due diligence on the Agent last refreshed?	_____ _____	<b>N/A</b>
<b>15</b>	Did the Agent resist the inclusion of anti-fraud, bribery and corruption clauses in its contractual relationship with Bellway, or did it attempt to negotiate such clauses so as to limit their scope or application?	Yes / No	
<b>16</b>	Has the Agent been successful in securing a difficult sale without an apparent explanation?	Yes / No	
<b>17</b>	Has the Agent ever requested payment ahead of schedule? Has the Agent ever exerted pressure for payment to be made urgently?	Yes / No Yes / No	
<b>18</b>	Are invoices issued in respect of the services? Has the Agent ever requested payment without an invoice?	Yes / No Yes / No	
<b>19</b>	Has the Agent requested payment to be made to a separate entity? Has the Agent requested that payment be split between two or more accounts? Has the Agent requested payment to an anonymous (numbered) bank account?	Yes / No Yes / No Yes / No	
<b>20</b>	Has the Agent ever requested an increase or decrease in fees/commissions in order to "cut red tape"?	Yes / No	
<b>21</b>	Has the Agent ever requested to be paid in cash?	Yes / No	

Risk Rating Assessment – Actions

**No risks / Greens only**

- Any appointment to be signed off by Regional Chair in accordance with standard policy.
- Due diligence records to be kept and payments processed in accordance with standard policy.

**Some Oranges**

- Any appointment to be signed off by Regional Chair in accordance with standard policy but frequently monitored for changes in behaviour (e.g. for “Red Risk” factors).
- Due diligence records to be kept and payments processed in accordance with standard policy.

**Any Reds**

- Appointment to be discussed between Regional Chair and Chief Commercial Officer before any decision is made.
- Consider obtaining professional third party background check and external legal advice.
- Unless Bellway is satisfied it is extremely unlikely that the Agent will be involved in bribery, it must not appoint the Agent.

## Appendix B – Standard wording to be sent to agent to agree fee

### ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY WORDING WHICH MUST BE INCLUDED IN THE WRITTEN AGREEMENT WITH THE AGENT (who are used to acquire land or are instructed on resales)

1. Confirmation of the agreed fee.
2. Clearly set out when the fee is payable (i.e. within 10 working days of the acquisition of the Property by us or on an agreed resale profile).
3. Clearly set out that the fee is not payable in the following circumstances, i.e.:
  - 3.1 where there has been a breach of any of the provisions of the Bribery Act clause below, upon which the agreement will terminate immediately and any fees already paid becoming immediately repayable;
  - 3.2 where we acquire the Property on terms which are materially adverse to those contemplated at the date the fee agreement is completed;
  - 3.3 in the event that we have not purchased the site after a certain period (i.e. 6/12 months) regardless of the circumstances – if you can agree that – otherwise and where negotiations with the Vendor have terminated and we then subsequently purchase the Property from the open market.
4. Confirmation of the services (which are to be specified clearly and in detail) that we will receive in consideration of the agreed fee
5. Confirmation that the agreement is subject to the ECCTA and the Bribery Act as follows, **using the precise wording below:**

*“The Agent shall and shall procure that persons associated with it (as defined by Section 8 of the Bribery Act 2010, “Agent Associated Persons”) or other persons who are performing services in connection with this agreement:*

- a comply with all applicable laws, statutes, regulations, and codes relating to anti-fraud, bribery and anti-corruption, including but not limited to the Economic Crime and Corporate Transparency Act 2023 and Bribery Act 2010 and any Guidance for the time being issued under those Acts;*
- b comply with Bellway’s statement of principles in relation to anti-fraud, bribery and corruption as updated from time to time and made available on Bellway’s corporate website; and*
- c without prejudice to the foregoing:*
  - (i) not engage in any activity, practice or conduct which would constitute an offence under the Economic Crime and Corporate Transparency Act 2023 or the Bribery Act 2010 if such activity had been carried out in the UK;*
  - (ii) promptly report to Bellway any request of or demand for any undue financial or other advantage of any kind offered to or received by it in connection with the performance of this Agreement;*
  - (iii) promptly report to Bellway any notice, written communication, investigation or proceedings against the Agent, any member of its group or any of its or their directors, officers, employees, agents or other Agent Associated Persons in connection with any actual or alleged fraud, bribery or other corrupt activity;*
  - (iv) at Bellway’s request permit access to the agent’s records, co-operate fully, at its own cost, with any investigations and related matters pertaining to the engagement and certify to Bellway in writing, signed by the Agent or its duly authorised officer, compliance with this clause by it and all persons associated with it; and*
  - (v) ensure that no part or the whole of the fee payable by Bellway to the Agent under the terms of this Agreement is paid to a third party to facilitate or otherwise further Bellway’s acquisition of the Property.*

*To the extent permitted by law, the Agent will indemnify and hold harmless Bellway from and against any and all claims, damages, losses, penalties, costs (including but not limited to legal fees) and expenses arising from or related to, any breach by the Agent or the Agent’s Associated Persons of this clause.”*

**The letter can only be signed by a Managing Director or Regional Chair, except in the case of marketing or resale fees which only Regional Chair can approve.**

**A copy of the letter must also be signed by the agent to confirm their agreement to and compliance with Bellway’s Anti-Fraud, Bribery and Corruption Policy wording.**

## Appendix C – Request to Pay Agent’s Fees (Immediate Land)



### ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY REQUEST TO PAY AGENT’S FEES

DIVISION: \_\_\_\_\_

SITE: \_\_\_\_\_

VIABILITY APPROVAL NUMBER: \_\_\_\_\_

NAME OF AGENT (AND PAYEE): \_\_\_\_\_

AMOUNT: \_\_\_\_\_

DATE PAYMENT REQUIRED: \_\_\_\_\_

	(please tick box)		
	Yes	No	N/A
1 Are arrangements between the Group and the agent in writing in the format prescribed by the Group and do they comply with the Group Anti-Fraud, Bribery and Corruption Policy and Procedure requirements? (Please enclose a copy of the agreement and a copy of the completed “Proposed Appointment of Agent – Due Diligence Questionnaire”). <b>For payments in instalments the agreement must be attached to each request to pay.</b>	<input type="checkbox"/>	<input type="checkbox"/>	
2 In the case of a site introduction by the agent, has the fee the agent is to receive been agreed in writing by the MD or Regional Chair? (Please enclose a copy of the agreement).	<input type="checkbox"/>	<input type="checkbox"/>	
3 In the case of marketing/resales service agreed with the agent, have the fees the agent is to receive been agreed in writing by the Regional Chair?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4 Is the level of the fee the agent is to receive in accordance with the Group approved land viability?	<input type="checkbox"/>	<input type="checkbox"/>	
5 Are the services that the land agent is to perform (or has performed) clear and documented and is the fee payable proportionate*? (Please enclose a copy of the invoice addressed to Bellway Homes Limited)	<input type="checkbox"/>	<input type="checkbox"/>	
6 Where any payments are to be made by the Group to the vendor’s agent (whether as an introductory fee or for resales), is there documentation between the Group and the vendor to confirm the vendor’s agreement to this? (Please enclose a copy of the relevant correspondence)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7 Can you confirm that to the best of your knowledge, the fee, or no part of the fee, is to be paid to a third party to facilitate, or otherwise, further Bellway’s acquisition of the site	<input type="checkbox"/>	<input type="checkbox"/>	

Failure to comply with the Group’s Anti-Fraud, Bribery and Corruption Policy and in addition, to complete this form satisfactorily, will result in the application being refused and the payment rejected.

\* **As a guide, in relation to introduction payments, anything in excess of 2% of purchase price could be viewed as excessive. In any event, no fee should be payable in excess of £250,000 without the express prior written approval of the Group Legal Director.**

Any other comments: \_\_\_\_\_

Signed: \_\_\_\_\_  
Regional Chair

Signed: \_\_\_\_\_  
Div. Managing Director

Signed: \_\_\_\_\_  
Div. Finance Director

Date: \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

## Appendix C – Request to Pay Agent’s Fees (Strategic Land)



### ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY REQUEST TO PAY AGENT’S FEES – STRATEGIC LAND

GROUP/REGION/DIVISION: \_\_\_\_\_

SITE: \_\_\_\_\_

VIABILITY APPROVAL NUMBER (IF APPLICABLE): \_\_\_\_\_

NAME OF AGENT (AND PAYEE): \_\_\_\_\_

COMPANY NUMBER (IF APPLICABLE): \_\_\_\_\_

AMOUNT: \_\_\_\_\_

DATE PAYMENT REQUIRED: \_\_\_\_\_

		(please tick box)		
		Yes	No	N/A
1	Are arrangements between the Group and the agent in writing in the format prescribed by the Group and do they comply with the Group Anti-Fraud, Bribery and Corruption Policy and Procedure requirements? (Please enclose a copy of the agreement and a copy of the completed “Proposed Appointment of Agent – Due Diligence Questionnaire”). <b>For payments in instalments the agreement must be attached to each request to pay.</b>	<input type="checkbox"/>	<input type="checkbox"/>	
2	In the case of a site introduction by the agent, has the fee the agent is to receive been agreed in writing by the Regional Strategic Land Director or Group Strategic Land Managing Director? (Please enclose a copy of the agreement).	<input type="checkbox"/>	<input type="checkbox"/>	
3	Is the level of the fee the agent is to receive in accordance with the Group approved land viability?	<input type="checkbox"/>	<input type="checkbox"/>	
4	Are the services that the land agent is to perform (or has performed) clear and documented and is the fee payable proportionate*? (Please enclose a copy of the invoice addressed to the relevant Bellway legal entity)	<input type="checkbox"/>	<input type="checkbox"/>	
5	Where any payments are to be made by the Group to the vendor’s agent (whether as an introductory fee or for resales), is there documentation between the Group and the vendor to confirm the vendor’s agreement to this? (Please enclose a copy of the relevant correspondence or confirm that it is expressly covered in the Option/Purchase Agreement)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	Can you confirm that to the best of your knowledge, the fee, or no part of the fee, is to be paid to a third party to facilitate, or otherwise, further Bellway’s acquisition of the site	<input type="checkbox"/>	<input type="checkbox"/>	

Failure to comply with the Group’s Anti-Fraud, Bribery and Corruption Policy and in addition, to complete this form satisfactorily, will result in the application being refused and the payment rejected.

\* **As a guide, in relation to introduction payments, anything in excess of 2% of purchase price could be viewed as excessive. In any event, no fee should be payable in excess of £250,000 without the express prior written approval of the Group Legal Director.**

Any other comments: \_\_\_\_\_

Signed: \_\_\_\_\_  
Group Strategic Land Managing  
Director

Signed: \_\_\_\_\_  
Regional Strategic Land Director

Date: \_\_\_\_\_

Date: \_\_\_\_\_

## Appendix D – Procurement Due Diligence Checklist



**ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY  
PROCUREMENT DUE DILIGENCE CHECK LIST  
(OTHER THAN AGENTS RELATING TO LAND ACQUISITION)**

<b>DIVISION/COMPANY NAME:</b>		
<b>NAME OF PARTY TO BE ENGAGED</b>		
<b>DETAILS OF PROPOSED PROJECT</b>		
<b>VALUE OF PROJECT TO BE CARRIED OUT BY PARTY</b>		
<b>DETAILS OF DUE DILIGENCE CARRIED OUT:</b>		<b>Details of action taken/comments:</b>
Details of third parties anti-fraud, bribery and corruption policies and procedures (copy enclosed)		
Does the third party request similar anti-fraud, bribery and corruption policies for its sub-contractors/supply chain?		
Direct interrogation		
Indirect enquiry		
General research		
References (verbal/written)		
Press references		
Internet research		
Other		
<b>RISK ASSESSMENT 1 – 5</b>		
<p style="text-align: center;">                 Very Low                      Low                      Medium                      High                      Very High                  1                                      2                                      3                                      4                                      5                  Please indicate degree of risk by circling appropriate number             </p>		
<b>CONCLUSION/RECOMMENDATION</b>		
<b>DUE DILIGENCE CARRIED OUT BY</b>		<b>RECOMMENDATION</b>
(Divisional Director or Department Head):  Name (please print): _____  Position: _____  Signature: _____  Date: _____		<b>APPROVED/NOT APPROVED BY TWO OF RC/MD/FD/TD/CD</b> (delete as appropriate & should not be the same person who carried out the due diligence)  Name (please print): _____  Position: _____  Signature: _____  Date: _____  Name (please print): _____  Position: _____  Signature: _____  Date: _____

## Appendix E - Approval and Reporting of Gifts, Corporate Hospitality/Entertainment Form



**ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY  
APPROVAL AND REPORTING OF GIFTS, CORPORATE HOSPITALITY/ENTERTAINMENT**

**YOU MUST COMPLETE THIS FORM TO:**

- 1 Obtain approval before you accept a gift or corporate hospitality/entertainment
- 2 Obtain approval to offer a gift, corporate hospitality/entertainment
- 3 Report any gift, corporate hospitality/entertainment you have declined

**Divisional Employees**

Approval must be obtained from your Head of Department before submitting this form to your Finance Director for recording in the Divisional register.

**Group Employees**

Approval must be obtained from your Head of Department before submitting this form to the Chief Commercial Officer for final approval and recording in the Head Office register.

<b>Employee's Name</b>	
<b>Job Title</b>	
<b>Division</b>	
<b>Name of Third Party Company</b>	
<b>Name of Third Party Contact</b>	
<b>Date of Event (if applicable)</b>	
<b>Brief Description of Event/Gift</b>	
<b>Estimated Value</b>	
<b>Event paid by Bellway / 3<sup>rd</sup> Party (Please confirm which)</b>	
<b>I would like to attend the event and confirm that by attending this event I will not have attended more than 3 events with this supplier in the last 12 months.</b>	
<b>I have been offered and gift and would like to accept it for an on behalf of Bellway. The gift will be donated to Bellway to use as a charity raffle prize. I will not keep the gift for my personal use.</b>	
<b>I would like to host the event/offer gift (offer of gift requires MD approval)</b>	
<b>I have declined the invitation/gift</b>	
<b>Employee's Signature</b>	
<b>Date</b>	
<b>DIVISIONAL EMPLOYEES ONLY</b>	
Department Head's Signature	
MD's Signature (for hospitality to be offered)	
Date of Approval	
<i>Now pass form to Divisional FD</i>	
Date Entered in Divisional Register	
<b>GROUP EMPLOYEES ONLY</b>	
Department Head's Signature	
Date of Approval	
CCO Signature	
Date of Final Approval	
Date Entered in Head Office Register	

## **Appendix F – Statement of Policy**



**To Whom It May Concern**

**STATEMENT OF POLICY**  
**FROM THE BOARD OF BELLWAY p.l.c.**  
**ECONOMIC CRIME AND CORPORATE TRANSPARENCY ACT 2023**  
**BRIBERY ACT 2010**  
**IMPORTANT DOCUMENT**

Bellway operates a zero-tolerance policy in respect of any form of fraud, bribery or corruption. The penalties for fraud, bribery and corruption are severe. They include up to 10 years imprisonment for individuals and an unlimited fine for companies as well as adverse publicity and damage to reputation.

This Statement of Policy is deliberately succinct. Combating fraud and bribery is fundamentally about common sense and creating a culture of ethical behaviour, not burdensome procedures.

Fraud includes any specified fraud offence. The Economic Crime and Corporate Transparency Act includes a corporate offence for failing to prevent fraud being carried out by an associated person with the intention of benefitting the company.

The Bribery Act is not about curtailing legitimate and proportionate corporate entertainment - which is an important device in establishing and maintaining good relationships - it is about stopping bribery and corruption.

Corruption is about the abuse of entrusted power for private gain. This includes bribery, which is the offering, promising or giving of a bribe (active bribery) or accepting a bribe (passive bribery). There is also the bribery of a Foreign Public Official, which is unlikely to apply to Bellway. There is also the corporate offence where a company fails to prevent bribery being carried out on its behalf.

Bellway's zero tolerance approach to fraud, bribery and corruption has been adopted by the Board of Bellway p.l.c. and will apply to all companies/entities within the Bellway Group, including, for the avoidance of doubt, all its subsidiaries, joint venture companies and any consortium arrangements that the Group has. It extends to all the Group's business dealings and transactions and sets out the standards expected of all its employees and those who work for and with the Group.

The Group's approach to fraud, bribery and corruption is underlined not only by adherence to all relevant legislation but by ensuring, as far as possible, that its business activities are genuine and ethical. Bellway expects all its employees and those work for and with the Group to maintain the highest standards of integrity and conduct in all their business dealings.

As it is expected that all those who work for and with the Group adhere to the Group's zero tolerance approach to fraud, bribery and corruption, all references to Bellway, the Group and its employees in this Statement of Policy apply equally to individuals and companies who are business partners who work with and for the Group (who are referred to as 'business partners').

## KEY PRINCIPLES

- 1 Integrity** – Bellway employees and those acting on behalf of the Group (business partners) must not act in any way that could undermine or give rise to allegations or doubts about their integrity or commitment to a zero-tolerance approach to fraud, bribery and corruption. In particular, employees and business partners must conduct all business relationships fairly and honestly and at arms-length.
- 2 Transparency** – Bellway employees and business partners must exercise extreme care to ensure their business dealings are clear and ethical. This is so important, particularly in relation to business partnerships (especially those with agents, intermediaries and the Group’s supply chain); gifts, corporate hospitality, entertainment and expenses; donations; share dealings; the use of confidential information and conflicts of interest. Bellway employees and business partners must adhere, at all times, to Group purchasing policies and processes.
- 3 Security and Reporting Bribery** – Bellway encourages employees and business partners to immediately report any suspected business wrongdoing. This can be via its confidential reporting hotline, SpeakUp (for employees), or by reporting directly to Bellway’s Anti-Fraud, Bribery and Corruption Compliance Officer, Dale Armstrong the Group Legal Director (for employees and business partners). All employees and business partners are assured that no employee or business partner will suffer any adverse consequences for refusing to take part in fraud, bribery or corruption, or for reporting suspected business wrongdoing, including fraud and bribery.
- 4 Monitoring and Review** – The Anti-Fraud, Bribery and Corruption Compliance Officer will monitor the Policy on an ongoing basis and he and the Audit Committee of the Board of Bellway p.l.c. will formally review Policy compliance at the half-year and year-end. As part of this process, if the need arises for changes to this Policy or wider guidance is required, those changes will be implemented.
- 5 Practical Action** – Bellway will enforce its Policy throughout its employment contracts and in its agreements with its supply chain and business partners. Anti-fraud, bribery and corruption provisions will be included in all relevant contracts and agreements with third parties. Bellway will act firmly in respect of any failure to comply with this Policy. Any failure to comply by employees may result in summary dismissal and may also result in criminal prosecution and/or civil proceedings. Any failure to comply by business partners will mean that the contractual agreement may be terminated, and the Group will avoid doing business with that partner in the future. The Group will look to its business partners and supply chain to adopt similar policies to Bellway and encourage comparable arrangements with business partners’ own supply chains.

If you have any concerns about the issues covered in this Statement of Policy, you should not hesitate to raise them with Bellway’s Anti-Fraud, Bribery and Corruption Compliance Officer, Dale Armstrong, Group Legal Director at Bellway p.l.c., Woolsington House, Woolsington, Newcastle upon Tyne, NE13 8BF; Tel: 0191 217 0717.

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**Jason Honeyman**  
Chief Executive

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**Simon Scougall**  
Chief Commercial Officer

Updated March 2026

## Appendix G – Personal use of Bellway Suppliers and Sub-Contractors by Employees

**In accordance with Bellway's  
Anti-Bribery and Corruption Policy and Procedures  
all purchases/private works  
must be approved in advance by Head Office**

**ONE FORM PER SUPPLIER/SUB-CONTRACTOR/PROFESSIONAL TO BE  
COMPLETED**

**PLEASE ALLOW UP TO 5 WORKING DAYS FOR APPROVAL**

**(approval will be emailed to employee and FD)**

**Name of employee:**

\_\_\_\_\_

**Division:**

\_\_\_\_\_

**Job title:**

\_\_\_\_\_

**Supplier/Sub Contractor/Professional:**

\_\_\_\_\_

**CHECK LIST BEFORE SUBMITTING THIS FORM FOR APPROVAL** *Please tick*

QUOTATION FROM SUPPLIER ATTACHED

QUOTATION SHOWS THE DESCRIPTION AND COST OF EACH ITEM

QUOTATION CONFIRMS THAT THE COST IS NO LESS THAN BELLWAY WOULD PAY

I CONFIRM THAT THESE MATERIALS/SERVICES ARE FOR MY OWN PERSONAL USE

**Employee's Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**E-mail address to send approval to:**

\_\_\_\_\_

**NOW E-MAIL THIS FORM AND QUOTATION TO:** [staffpurchases@bellway.co.uk](mailto:staffpurchases@bellway.co.uk)

\_\_\_\_\_

**HEAD OFFICE USE ONLY:**

**Cost confirmed by Technical Department/Sales Department/Legal Department:**

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Approved by Company Secretarial Department:**

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

## Appendix H – Approval of House Purchase by Employee or connected Person(s)

**ALL RESERVATIONS MUST BE APPROVED IN ADVANCE BY HEAD OFFICE**

<b>NAME OF EMPLOYEE</b>	
<b>DIVISION</b>	
<b>JOB TITLE</b>	
<b>CONNECT PERSON SALE</b> This <b>does not include</b> spouse if a joint purchase with employee This <b>does include</b> a sub-contractor/supplier/professional of Bellway	YES <input type="checkbox"/> NO <input type="checkbox"/> (Please tick)
<b>FULL NAME OF CONNECTED PERSON(S) AND RELATIONSHIP TO EMPLOYEE</b> (If applicable)	
<b>PLOT NUMBER</b>	
<b>DEVELOPMENT NAME &amp; DIVISION</b>	
<b>RELEASE DATE</b> <i>Plot must be released for sale on the sales monitor prior to submitting this form to Head Office</i>	
<b>RELEASE PRICE</b>	£
<b>SITE DISCOUNT / INCENTIVES</b> <i>List each item separately with cost</i>  <i>Guidance – site discount/incentives should normally be no more than the average given on reservations on identical house types over the previous 6 months.</i>	
<b>NET PRICE</b>	£
<b>THIS FORM MUST BE SIGNED AND DATED BY BOTH THE MANAGING DIRECTOR AND SALES DIRECTOR BEFORE SUBMITTING TO HEAD OFFICE</b>	
<b>Managing Director's Signature</b>	
<b>Date</b>	
<b>Sales Director's/Manager's Signature</b>	
<b>Date</b>	
<b>NOW SUBMIT THIS FORM TO THE GROUP SALES OFFICE MANAGER AT HEAD OFFICE</b>	
<b>Group Sales Office Manager Signature</b>	
<b>Date</b>	
<b>Co Sec Dept Signature</b>	
<b>Date</b>	

**PLEASE ALLOW UP TO 5 WORKING DAYS FOR APPROVAL.  
 APPROVAL WILL BE E-MAILED TO MD, SD & FD**