



Whistleblowing Policy and Procedure

March 2026

Owners: Phil Hope, Group Finance Director and Company Secretary
Lyndsey O’Leary, Group Risk Director
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

BELLWAY p.l.c. ('Bellway')
Whistleblowing Policy and Procedure ('Policy')

1. What is Whistleblowing?

Whistleblowing under this Policy means the disclosure by an individual of information which they believe shows malpractice or wrongdoing. This would include misconduct such as criminal offences, failure to comply with legal obligations, negligent behaviour or breaches of professional standards.

2. The Public Interest Disclosure Act 1988 (the 'Act')

The Act makes provisions about the kinds of disclosures which may be protected, the circumstances in which they are protected and the persons who may be protected. The provisions protect employees from being subjected to detriment by their employer.

The Act applies to employees, casual employees, certain agency employees, and third-party contractors whose work is controlled by Bellway and those working under training contracts, collectively 'Employees'.

3. Policy Statement

Bellway p.l.c. is committed to conducting its business with honesty and integrity at all times. If, at any time, this commitment is not respected or appears to be in question, Bellway will endeavour to identify and remedy such situations.

This policy aims to provide a safe and confidential reporting mechanism for Employees to report any unethical or illegal behaviour that they have witnessed or are asked to participate in. This Policy protects Employees from retaliation for reporting such behaviour and ensures that Bellway takes the appropriate action against those who violate external laws and regulations and/or internal policies.

Any questions in relation to this Policy should be referred to either the Group Finance Director and Company Secretary or the Group Risk Director in the first instance.

4. Scope and Purpose

4.1 This policy applies to all Employees.

4.2 The purpose of this Policy is to encourage Employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and to provide Employees with guidance as to how to raise those concerns.

4.3 This Policy is endorsed by the Board and will be reviewed regularly by the Audit Committee and the Board.

5. Responsibility of Employees

5.1 It is the responsibility of all Employees to report misconduct or suspected misconduct, including but not limited to that any of the following have occurred, are occurring or are likely to occur:

- a criminal offence;
- a failure to comply with any legal, regulatory or professional obligations/requirements;
- bribery or corruption;
- tax evasion or facilitating tax evasion;
- a miscarriage of justice;
- danger to the health and safety of any individual;
- slavery or human trafficking;
- damage to the environment;
- financial impropriety, fraud or mismanagement;
- abuse of company property;
- improper or negligent professional behaviour;
- sexual harassment; or
- the deliberate concealment of information tending to show any of the matters listed above.

5.2 Please note that concerns about your own personal circumstances or your terms and conditions of employments should be raised under the Grievance Policy.

5.3 If you have a serious concern relating to one of the areas listed in section 5.1 above, you can report it using the procedure in section 8, without fear of reprisal.

6. Assurances

6.1 Bellway is committed to the principles of this Policy. You can be assured that Bellway will take the necessary steps to ensure that you will not suffer unfair treatment or victimisation in your work at or with Bellway if you raise a concern in accordance with this Policy.

6.2 In doing so Bellway commits to:

6.2.1 Take practical measures to protect the identity of the whistleblower e.g. to not disclose their identity without consent unless legally required to, and to prohibit attempts to identify them.

6.2.2 Take a zero-tolerance approach to victimisation of anyone raising a concern in accordance with this Policy or any other attempt to interfere with a whistleblowing process such as:

6.2.2.1 Directly or indirectly threatening, intimidating or pressuring the whistleblower or any witness concerned in the investigation or those involved in the management and conduct of the investigation; and

6.2.2.2 Attempting in any way to convince or coerce any individual to change their statement, or any other interference in an investigation process.

7. Whistleblowing Procedure

7.1 If it is not possible to resolve your concerns informally or if you consider the matter too serious to be handled informally, you can follow the formal procedure set out below. A qualifying disclosure can be made if you genuinely believe that Bellway or any Employee has taken, is intending to take or has failed to take action that you reasonably believe will lead or amount to matters set out in section 5.1 of this Policy.

7.2 You should not bypass this procedure and air concerns externally, other than in exceptional circumstances, for example if you have good reason to believe that evidence would be destroyed. We strongly encourage you to seek advice before reporting a concern to anyone external.

7.3 The independent whistleblowing charity, Protect, operates a confidential helpline. Please refer to www.protect-advice.org.uk or call 020 3117 2520. Remember also that social media sites such as X and Facebook are public rather than private forums, and they are not the appropriate channel for raising concerns.

7.4 If you disclose information, we will make every effort to keep your identity confidential. Anonymous disclosures are discouraged, however, as they are likely to hinder effective investigation, but if you wish to remain anonymous then you can.

8. How to raise concern

8.1 Employees

8.1.1 If you have a concern about malpractice or any other matter listed in section 5.1, it is hoped that you will feel able to raise it in the first instance with your line manager or another divisional or Group senior manager. This may be done verbally or in writing. If you choose to raise your concern in writing, please provide details of how you can be contacted.

8.1.2 Alternatively, you can follow the processes in section 8.2 below.

8.2 Employees and external

8.2.1 If you have concerns about any matter listed in section 5.1 by:

8.2.1.1 **Writing to or calling either the Group Finance Director and Company Secretary or the Group Risk Director at Group Office; or**

8.2.1.2 **Contacting the confidential whistleblowing service either by telephone on 0800 056 9041 or online at www.Bellway.ethicspoint.com, this service is available 24 hours a day, 7 days a week.**

9. What your report should contain

You should clearly explain the full details of the issue(s) you are concerned about including but not limited to:

- i. Your full name and department (if you feel able to).
- ii. Date that the concern is raised.
- iii. A summary of your concern.
- iv. Details of any witnesses or supporting evidence.
- v. Details of steps you have taken to resolve the matter informally.
- vi. Details of how you would like the concern to be resolved.
- vii. Details of how you would like to be contacted in case you make an anonymous report.

10. What happens once a disclosure has been made

- 10.1 Bellway will promptly investigate your allegation and will take whatever action it considers appropriate, which may include disciplinary action. Depending on the nature of your concern it may be escalated by the Group Finance Director and Company Secretary or Group Risk Director to a member of the Executive Team.
- 10.2 Your assistance may be required during the investigation. Your allegation will be addressed seriously, and you will be informed of the outcome of the investigation as soon as practicable.
- 10.3 If you reasonably believe that the nature of your concern relates to any of the areas set out in section 5.1 above or have a reasonable belief that it is in the public interest, no action will be taken against you for making the disclosure.
- 10.4 The timeframes for investigating concerns raised under this Policy are likely to vary depending on the nature and complexity of the case.
- 10.5 Bellway endeavours to operate within the following guidelines:
 - 10.5.1 To acknowledge receipt of a concern raised under this Policy within five working days.
 - 10.5.2 To prioritise and progress the investigate appropriately.
 - 10.5.3 To ensure that the person raising the concern is provided with regular updates.
 - 10.5.4 To aim to conclude investigations, where practicable, within a two-month period.

We aim to encourage openness and will support Employees who raise genuine concerns under this policy, even if they turn out to be mistaken. Bellway will take appropriate action against any person:

- found to be victimising another person for using this procedure, or deterring any person from reporting genuine concerns under it; or
- making the disclosure/allegation maliciously or vexatiously, or where there were no reasonable grounds for believing that the information supplied was accurate.