



Anti-Slavery and Human Rights Policy

MAY 2025

Owner: Rodica Damian

Executive Sponsor: Simon Scougall

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BELLWAY p.l.c. ('Bellway')

ANTI-SLAVERY AND HUMAN RIGHTS POLICY

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 Human rights (as set out in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work) are recognised in everything that Bellway do. Bellway is committed to respecting, protecting and promoting human rights of our employees as well as our customers, contractors, suppliers and the communities we encounter in our operations. Therefore, creating an environment our colleagues can thrive in, which is an important part of our Better with Bellway strategy, is why we aim to go above and beyond compliance with Human rights.
- 1.3 Bellway has a zero-tolerance approach to modern slavery and violations of human rights and is committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our approach to tackling modern slavery in our business and throughout our supply chains, which is consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners'.

2. ABOUT THIS POLICY

- 2.1 The purpose of this Policy is to:
 - a) Set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking as well as human rights; and
 - b) Provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human rights.
- 2.2 This Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers or any other people or bodies associated with the business.

3. RESPONSIBILITY FOR THE POLICY

- 3.1 The Board of Directors has overall responsibility for ensuring this Policy complies with our legal obligations, and that all those under our control comply with it.
- 3.2 The Anti Slavery and Human Rights Compliance Team (the 'Compliance Team') which comprises the Group Production Managing Director, Group HR Director, Group Risk Director, Head of Sustainability (Group Office) and Group Deputy Company Secretary and Group Legal Director will work together to ensure that this Policy is maintained across all operational areas of the Group in accordance with evolving regulatory requirements and to ensure that any breaches or concerns are addressed.
- 3.3 The Group Production Managing Director has primary and day-to-day responsibility in relation to our supply chain for implementing this Policy and monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery and human rights violations.
- 3.4 The Group HR Director has primary and day-to-day responsibility in relation to those directly employed by us for implementing this Policy and monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery and human rights violations.
- 3.5 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

4. COMPLIANCE WITH THE POLICY

- 4.1 All persons working for Bellway must ensure that they read, understand and comply with this Policy.
- 4.2 The prevention, detection and reporting of modern slavery and any violations of human rights in any part of our business or supply chains is the responsibility of all those working for us or under our control. All persons working for Bellway are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 4.3 Bellway employees are required to support and engage with Bellway to help promote a culture which respects others' fundamental human rights and is committed to constantly improving our performance in relation to human rights as well as modern slavery and embedding a culture of openness and transparency. All persons working for Bellway are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage, by reporting it to your manager or in

accordance with our Whistleblowing Policy and Procedure Whistleblowing Procedure | Bellway Corporate.

- 4.4 Bellway will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery or violations of human rights, of whatever form, is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you may have suffered any such treatment, you should inform the Compliance Team immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Bellway Grievance Procedure.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

- 5.1 This Policy will be communicated to all Bellway employees.
- 5.2 Bellway employees are required to communicate our zero-tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforce our approach as appropriate thereafter.

6. DUE DILIGENCE

- 6.1 Bellway may impact the rights of employees and workers in our supply chain (as they relate to labour, employment and health and safety) as well as those of people in the communities where we operate.
- 6.2 Our Slavery and Human Trafficking Statement gives further details on some of the due diligence processes we have in place to help mitigate these risks.
- 6.3 In order to give effect to our zero-tolerance approach, we have systems in place to ensure that all employees and those in our supply chain implement our policy. These will be kept under review by the Compliance Team.
- 6.4 Training on this policy, and on the risk Bellway faces from modern slavery in its supply chain and adherence to human rights, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

7. BREACHES OF THIS POLICY

- 7.1 Any breach of this policy will be treated as gross misconduct and may result in dismissal without notice.

- 7.2 We reserve the right to terminate our relationship with individuals and organisations working on our behalf if they do not comply with this policy.