

Bellway p.l.c.
SLAVERY AND HUMAN TRAFFICKING STATEMENT
FOR THE FINANCIAL YEAR ENDED 31 JULY 2018

This statement is made on behalf of Bellway p.l.c. pursuant to section 54(1) of the Modern Slavery Act 2015 ('the Act') and constitutes our slavery and human trafficking statement for the financial year ended 31 July 2018.

OUR STRUCTURE

Bellway p.l.c. is the 4th largest housebuilder by volume in the UK. We are listed on the London Stock Exchange (LSE: BWY) and we are a FTSE 250 listed company. We are the parent company of the Bellway Group (Group) which is made up of separately constituted and regulated legal entities providing housebuilding and related services. The Group has almost 3,000 employees and operates in the United Kingdom.

OUR BUSINESS

The main trading company of the Group is Bellway Homes Limited which as at 31 July 2018 operates through nineteen divisions.

OUR SUPPLY CHAINS

Our supply chains include purchasing materials, sub-contracting, design consultants, environmental and other associated trades and services connected with housebuilding.

OUR APPROACH

As one of the UK's largest housebuilders, we work to the highest professional standards and comply with all laws, regulations and rules relevant to our business. Our long-term approach to corporate responsibility, branded as Bellway4Good, considers the interests of our diverse stakeholder groups to ensure we make positive social, environmental and economic contributions across our business. Bellway4Good is our commitment to ensure that we operate our business in a responsible manner. For further information on Bellway4Good please [click here](#).

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

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

Our Anti Slavery Compliance Team help to ensure that our Anti Slavery Policy is complied with and to manage concerns or breaches. This Team meets regularly throughout the year to review progress against the steps we are taking to ensure compliance and to agree future steps to be taken. We also have a clear Whistleblowing Procedure which is available [here](#) if there are any genuine concerns about any wrongdoing or breaches of law these concerns can be raised in confidence and without fear of disciplinary action.

Our policies are reviewed annually and updated as required.

DUE DILIGENCE PROCESSES

As part of our initiative to identify and mitigate risk we are developing systems to ensure our supply chain and those who work for us implement our policy. This year:

- we continue to review our Group supply chain agreements when they are due for renewal to ensure compliance with our policy and are pleased to report that 100% of Group suppliers are compliant. We would not renew any agreement with a supplier who was not compliant; and
- we continue to require all our existing suppliers including divisional sub-contractors and suppliers, architects and consultants to confirm that they comply with Modern Slavery legislation, and have so far received a 94.7% response rate. All new contracts require compliance with the Act;
- we have increased the percentage of managers and those involved in recruitment who have completed our Anti Slavery training course from 49% to 97%;
- we have continued the roll out of electronic verification of CSCS cards on our construction sites to help to ensure that only those with the right to work in the UK are engaged in work on our sites. Currently we have been able to verify that 94% of our employees and sub-contracted staff hold an appropriate industry competence card.
- using posters, wallet cards and our staff newsletters we continue to promote our confidential reporting facility where concerns, including any regarding slavery, human trafficking and illegal working can be raised. We are very pleased to report that there have been no incidents of slavery, human trafficking or illegal working reported at any of our sites or offices.
- we have enhanced our employee verification checks to minimise the risk of slavery;
- we continue to review our procurement processes to consider what, if any, adjustments might be made to further reduce the level of risk of slavery and human trafficking in our supply chain; and
- we have considered what KPIs may be appropriate for us to adopt from 2018/19.

RISK ASSESSMENT

We consider that the main areas at risk of Modern Slavery at Bellway are our workforce and our contracting and procurement processes, and that the risk of Modern Slavery occurring in any of these areas is being proactively managed through the efforts of the Anti Slavery Compliance Team and the measures described in this Statement.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we require that our zero tolerance approach is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and that it is reinforced as appropriate thereafter. We may cease to engage with individuals and organisations working on our behalf if they do not comply with our approach.

FURTHER STEPS

We will continue to keep under review our internal processes to identify what further steps can be taken to ensure that our obligations under the Act are met and that our Anti Slavery Policy is effectively implemented and complied with, so as to ensure that there is no slavery or human trafficking in any part of our business.

Some of the specific measures we are considering include:

- Putting in place the following KPIs:
 - At least 100% of current managers and those involved in recruitment to have completed our Anti Slavery training course within the first three months of employment,
 - All relevant managers will complete annual refresher training; and
 - 100% of eligible staff on construction sites will have their CSCS cards or equivalent electronically verified to help us check their right to work in the UK.
- Having a zero tolerance procurement policy, which requires all suppliers and sub-contractors to confirm that they comply with the Act. This will be audited as part of our technical internal controls process.
- Making resources available to suppliers to support them in their compliance and staff training.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 July 2018.

The statement was approved by the Board on 15 October 2018 and signed on behalf of the Board by Jason Honeyman, Chief Executive, Bellway p.l.c.

This statement is made on behalf of:

Bellway p.l.c.

Bellway Homes Limited