



BELLWAY p.l.c. ('Bellway')
Whistleblowing (SpeakUp) Procedure

1. Introduction

The Public Interest Disclosure Act 1988 (the 'Act') protects employees who "blow the whistle" about wrongdoing. It 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 not just to employees but also to casual employees, certain agency employees, and third party contractors whose work is controlled by Bellway and those working under training contracts.

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

- We believe that good communications among those working for us at all levels promote better business practice.
- We will not tolerate wrongdoing by employees or third parties at any level.
- The purpose of this procedure is to enable us to investigate and deal properly and sensitively with allegations of wrongdoing raised by those working for us.
- If you have a serious concern relating to one of the areas listed in section 2 below you can report it using this procedure, without fear of reprisals.
- You should use this procedure if you wish to report or raise concerns about wrongdoing of the nature listed below. It is not intended to replace, for those employees covered by it, the Grievance Procedure, which continues to be the appropriate way to raise personal issues relating to your job or employment.
- We believe nobody should suffer any adverse consequences for reporting genuine concerns over suspected business wrongdoing or danger.

2. How to make a disclosure

A qualifying disclosure can be made if you genuinely believe that Bellway or any employee of Bellway has taken, is intending or has failed to take action that you reasonably believe will lead or amount to:

- a criminal offence;
- a failure to comply with any legal obligations;
- 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; or
- the deliberate concealment of information tending to show any of the matters listed above.

You can make a disclosure if you have concerns about any matter in addition to those listed above:

- **by writing to or calling either the Group General Counsel and Company Secretary or the Deputy Group Company Secretary at Head Office; or**
- **by contacting the confidential SpeakUp service either by telephone free on 0800 124 4830 or online at www.speak-up.info/bellway. This service is available 24 hours a day, 7 days a week.**

If you make such a disclosure, you should provide full details and, where possible, supporting evidence.

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 seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work operates a confidential helpline. Please refer to www.pcaw.co.uk or call 020 7404 6609. Remember also that social media sites such as YouTube and Facebook are public rather than private forums, and they are not the appropriate channel for raising concerns.

If you disclose information your identity will be kept confidential. Anonymous disclosures are discouraged as they are likely to hinder effective investigation, but if you wish to remain anonymous then you can.

3. What happens once a disclosure has been made

Bellway will promptly investigate your allegation and will take whatever action it considers appropriate, which may include disciplinary action. 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.

If you reasonably believe that the nature of your concern relates to any of the areas set out in section 2 above or have a reasonable belief that it is in the public interest, no action will be taken against you for making the disclosure.

We aim to encourage openness and will support workers 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.