



Bellway p.l.c.
SLAVERY AND HUMAN TRAFFICKING STATEMENT
FOR THE FINANCIAL YEAR ENDED 31 JULY 2019

This statement is made on behalf of Bellway p.l.c., Bellway Homes Limited and all the subsidiary companies within the Group 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 2019 (2018/19).

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 around 3,000 employees and up to 8,500 sub-contract workers on our sites at any one time. We operate in the United Kingdom.

OUR BUSINESS

The main trading company of the Group is Bellway Homes Limited which as at 31 July 2019 operates through twenty-two divisions.

OUR SUPPLY CHAINS

Our supply chains include sub-contractors, merchants, material suppliers, design and environmental consultants and various 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 have signed up to The Construction Protocol, supporting us in our commitment to identify and tackle labour exploitation;
- we have enhanced our employee verification checks to minimise the risk of slavery;
- we aim to have 100% of current managers and those involved in recruitment to have completed our Anti Slavery training course within the first three months of employment. The figure at 31 July 2019 was 98%;
- all relevant managers will complete annual refresher training;
- 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 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;
- we make resources available to suppliers to support them in their compliance and staff training; and.
- 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.

RISK ASSESSMENT

We consider that the risk of Modern Slavery within the Group is low. The main areas at risk of Modern Slavery at Bellway are our workforce and our contracting and procurement processes, and we consider 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 will 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:

- toolbox talks.
- using one national agent to manage the agencies we use to engage temporary staff. The agent will be responsible for carrying out compliance checks on the agencies in relation to modern slavery compliance, among other areas.
- adding modern slavery awareness in our induction video for Site Managers.
- conducting spot checks on right to work for workers on site.
- exploring offering maths and literacy training for new starters. We consider this will help to improve the ability of anyone at risk of modern slavery to report concerns to us or the relevant authorities.

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 2019.

The statement was approved by the Board on 9 October 2019 and signed on behalf of the Board by Jason Honeyman, Chief Executive, Bellway p.l.c.

Jason Honeyman

This statement is made on behalf of:

Bellway p.l.c.

Bellway Homes Limited