



## **SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDED 31 JULY 2021**

This statement is made on behalf of Bellway p.l.c. (company number: 01372603) and Bellway Homes Limited (company number: 00670176) 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 2021 (2020/21). This is the sixth statement made on behalf of Bellway p.l.c and Bellway Homes Limited and sets out the steps that we continue to take to prevent modern slavery and human trafficking in our business and supply chains.

During the period covered by this statement, we have had to adjust our ways of working as a result of COVID-19.

### **OUR STRUCTURE**

Bellway p.l.c is the parent company of the Bellway Group (“Group”) which is made up of separately constituted and regulated legal entities providing housebuilding and related services. Bellway p.l.c is listed on the London Stock Exchange (LSE: BWY) and we are a FTSE 250 listed company. We are headquartered in Newcastle and operate exclusively in the United Kingdom.

### **OUR BUSINESS AND SUPPLY CHAINS**

Evolving from a local family business to FTSE 250 company, Bellway has been building exceptional quality new homes throughout the UK for more than 75 years, creating outstanding properties in desirable locations.

Bellway p.l.c. is the 4<sup>th</sup> largest house builder by volume in the United Kingdom. The main trading company of the Group is Bellway Homes Limited, which as at 31 July 2021 operates through twenty-two divisions.

The Group has around 3,000 employees and up to 8,500 sub-contracted workers on our sites at any one time.

Our supply chains include sub-contractors, merchants, material suppliers, design and environmental consultants and various other associated trades and services connected with housebuilding, most of whom we have a long-standing relationship with.

### **OUR APPROACH**

As one of the UK's largest house builders, 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, has been rebranded as “Better with Bellway” and considers the interests of our diverse stakeholder groups to ensure we make positive social, environmental and economic contributions across our business. Better with Bellway is our commitment to ensure that we operate our business in a responsible manner.

## **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 helps to ensure that our Anti-Slavery Policy is complied with and manages concerns or breaches. Our Anti-Slavery Compliance Team meets at least bi-annually 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 in our supply chains, we continue to develop internal systems and controls to ensure our supply chain and those who work for us implement our policy. We:

- continue to be a signatory of The Construction Protocol, supporting us in our commitment to identify and tackle labour exploitation;
- monitor working conditions on our sites through regular social audits;
- continue to enhance our comprehensive employee verification checks and comply with all our obligations under applicable employment laws;
- continue to use posters, wallet cards and our staff newsletters to promote our confidential reporting facility where concerns, including any regarding slavery, human trafficking and illegal working, can be raised;
- have a zero tolerance procurement policy, which requires Group suppliers and sub-contractors to confirm that they comply with the Act. We have the right to audit as a standard condition within supplier and sub-contractor contacts;
- 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
- make resources available to suppliers to support them in their compliance and staff training through our membership of the Sustainability School.

## **RISK ASSESSMENT AND MEASURING EFFECTIVENESS**

We have assessed the risk of Modern Slavery within the Group to be low. The main areas at risk of Modern Slavery in the Group are our workforce and our contracting and procurement processes. The risk of Modern Slavery occurring in any of these areas is being proactively managed through the efforts of the Anti-Slavery Compliance Team, who meet at least bi-annually, and the measures described in this Statement.

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.

## **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain comply with our values we require that our zero tolerance approach is communicated to all suppliers, sub-contractors and business partners at the outset of our business relationship 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. We encourage suppliers sign up to our modern slavery policy, or provide a copy of their own policy.

## **FURTHER STEPS AND TARGETS**

As a result of the COVID-19 pandemic the original timescales for progressing our targets below have had to be revised. 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 will be progressing during the financial year ending 31 July 2022 include:

- we will audit a sample of our top suppliers and sub-contractors with regards to modern slavery;
- we will continue to perform welfare checks at our sites;
- we will host toolbox talks highlighting issues around modern slavery;
- we will relaunch a poster campaign across our sites and office to highlight the risk of modern slavery;
- we will conduct an audit on the right to work across the group as well as continuing with spot checks on right to work for workers on site; and
- we will participate in sector wide working groups in order to champion best practice.

We will review progress regularly and report in our next statement against the above.

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 2021.

The statement was approved by the Board on 6 October 2021 and signed on behalf of the Board by Jason Honeyman, Chief Executive, Bellway p.l.c.

*Jason Honeyman*