



SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDED 31 JULY 2025

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 2025. This is the tenth statement made on behalf of Bellway p.l.c. and Bellway Homes Limited (including Ashberry Homes, which is a trading division of 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.

OUR STRUCTURE, BUSINESS AND SUPPLY CHAINS

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.

Evolving from a local family business to a 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 one of the largest housebuilders by volume in the United Kingdom. The main trading company of the Group is Bellway Homes Limited, which as at 31 July 2025 operates through twenty trading divisions. The Group has around 2,700 employees (approximately 5% of which are part time) 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.

Within the Group we also use agency staff. We only use specified, reputable employment agencies to source agency workers and we verify the practices of any new agency that we are using before accepting workers from that agency.

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 initiative “Better with Bellway” embodies our approach to responsible and sustainable business practices.

Our long-term approach to corporate responsibility forms part of our “Better with Bellway” strategy and considers the interests of our diverse stakeholder groups to ensure we make positive social, environmental and economic contributions across our business.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Anti-Slavery and Human Rights Policy

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. As part of this commitment, this year we updated our Anti-Slavery Policy to include human rights within its scope. The policy applies to everyone working for us or on our behalf in any capacity, including employees, agency workers, contractors and suppliers. It sets out responsibilities for observing and upholding our commitment and provides information on how to identify and report concerns. All suppliers and subcontractors are required either to have their own modern slavery policy, or to adopt our [Anti-Slavery and Human Rights Policy](#).

We have an Anti-Slavery and Human Rights Compliance Team (which comprises of senior employees supported by a specialist external consultant) whose remit is to ensure that our Anti-Slavery and Human Rights Policy is complied with and that concerns or breaches are dealt with appropriately. Representatives from the Group HR, Group Production, Risk & Audit and Legal teams, sit on the Anti-Slavery and Human Rights Compliance Team and have primary and day-to-day responsibility for implementing this policy and monitoring its use and effectiveness. Management at all levels are responsible for ensuring that those reporting to them understand and comply with the policy and are given regular training on it and the issue of modern slavery in supply chains.

Our Anti-Slavery and Human Rights Compliance Team meets at least twice a year to:

- consider the level of risk to our business;
- review progress against the steps we are taking to ensure compliance; and
- consider any changes to our systems and controls to enhance compliance.

We have a [Whistleblowing Policy](#) which is publicised at all locations and allows all employees and supply chain workers to raise concerns in confidence to either the Chief Commercial Officer, Group Deputy Company Secretary or, alternatively, an independent third party. The Group encourages employees and members of our supply chains to raise any concerns in an open and honest way, without fear of disciplinary action or detriment. All whistleblowing reports are reviewed and confidentially investigated by senior, independent personnel and the findings are reported to the Board.

Sustainable Procurement Policy

Our [Sustainable Procurement Policy](#) aims to minimise the social, environmental and economic impact that our activities (including through our supply chains) have on our surroundings. The policy confirms that all suppliers will be assessed on their suitability to supply the Group by means of a managed supplier assessment procedure. Suppliers are also expected to carry out modern slavery due diligence further down the supply chain (for example audits at Tier 2 suppliers) and sign up to and work towards Gold membership of the Supply Chain Sustainability School scheme, or Gold membership of EcoVadis.

Safeguarding Policies

We have both a [Children and Young People's Safeguarding Policy](#) and an [Adult Safeguarding Policy](#). These policies set out the roles and responsibilities of staff to protect children and other vulnerable people from harm, abuse and exploitation. As with our other policies, these 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 chains 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;
- carry-out 'right to work' checks on all new employees joining the company through our Group HR function;
- monitor working conditions on our sites through regular welfare audits;
- continue to conduct risk-based site visits, with support from external specialist resource, focussed on our subcontracted workers and susceptibility to modern slavery related issues;
- 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 modern 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 contracts;
- continue to review our procurement processes to consider what, if any, adjustments might be made to further reduce the level of risk of modern slavery and human trafficking in our supply chain; and
- participate in sector-wide working groups to champion best practices – for example, we make resources available to suppliers to support them in their compliance and staff training through our membership of the Supply Chain Sustainability School, which provides training resources to individuals and organisations on various sustainability issues, including modern slavery.

RISK ASSESSMENT AND MEASURING EFFECTIVENESS

The main areas at risk of modern slavery in the Group are our workforce and supply chains.

We have assessed the overall risk of modern slavery to be low; however we recognise that the risk associated with subcontractors and suppliers is higher than that for our employees given a number of mitigations sit outside of our direct control. The risk of modern slavery occurring in any of these areas is being proactively managed through the Anti-Slavery Compliance Team and the measures described in this Statement.

There have been no incidents of modern slavery or human trafficking reported at any of our sites or offices for the year ended 31 July 2025.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero-tolerance to modern slavery and human trafficking. We are also committed to ensuring there is transparency in our approach to tackling these issues in our business and throughout our supply chains.

To ensure all those in our supply chains 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. As part of the onboarding process, we require suppliers to sign up to our Anti-Slavery and Human Rights Policy or provide a copy of their own policy.

PROGRESS IN 2025

Following the further steps outlined in our 2024 statement, we can report that for the period covered by this statement we have:

- continued to perform welfare checks at all our sites;
- continued our 'toolbox talks' to site employees, which highlight issues around modern slavery;
- continued risk-based site visits, internally and externally facilitated;
- recirculated the details of the Whistleblowing hotline, including to all contractors on sites;
- participated in sector wide working groups in order to champion best practice;
- launched a new induction system on our sites to further improve tracking of staff;
- updated the Group Health and Safety team on our modern slavery policy;
- trialled a new signing in process;
- updated our Modern Slavery e-learning and circulated this for completion to all relevant staff.

FURTHER STEPS AND TARGETS FOR THE YEAR AHEAD

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 and Human Rights Policy is effectively implemented and complied with, so as to ensure that there is no modern 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 2026 include:

- continuing to review signing in solutions on our sites;
- expanding our internally and externally facilitated risk based site audits;
- continuing to perform welfare checks at each of our sites;
- continuing to host "toolbox talks", and keep the content under review;
- continuing to participate in sector wide working groups in order to champion best practice;
- delivering face to face modern slavery and human trafficking awareness training to the Group Health and Safety Team, who are responsible for performing site welfare checks;

- continuing to monitor best practice and any proposed legislative changes in the area;
- keeping under review the modern slavery e-learning module, to ensure it remains relevant to current practices and legislation; and
- expanding our supplier engagement program, aiming for our top 500 subcontractors to be registered with the Supply Chain Sustainability School by July 2026.

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 2025.

The statement was approved by the Board on 8 October 2025 and signed on behalf of the Board by Jason Honeyman, Chief Executive, Bellway p.l.c.

Jason Honeyman