



## **Bellway p.l.c.**

### **SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDED 31 JULY 2016**

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.

#### **ORGANISATION'S STRUCTURE**

Bellway p.l.c. is the 4<sup>th</sup> 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 over 2,500 employees and operates in the United Kingdom.

#### **OUR BUSINESS**

The main trading company of the Group is Bellway Homes Limited which 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. 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.

## **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 appointed a Group HR Director who will, as part of their role, review internal HR processes and policies to understand and to address the potential for slavery and human trafficking in our staffing structure;
- we are reviewing our supply chain agreements when they are due for renewal to ensure compliance with our policy; and
- we already have in place a confidential reporting facility where concerns, including any regarding slavery and human trafficking can be raised.

## **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 are currently reviewing our internal processes to understand 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:

- Reviewing existing policies and procedures to ensure that our staff know how to, and are resourced to prevent or identify exploitation.
- Developing training for those involved in recruiting and supply chain management to raise awareness of slavery and human trafficking and its implications and so that they are able to identify risk factors and report potential for non-compliance; and
- Reviewing 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.

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 2016.

The statement was approved by the Board on 6 October 2016 and signed on behalf of the Board by Ted Ayres Chief Executive, Bellway p.l.c.