

Berkeley's success is driven by the passion, dedication and innovation of its people. The Group's philosophy is to devolve operational responsibility and accountability to autonomous management teams and this creates an environment in which these attributes flourish. Urban regeneration is complex and it requires a relentless attention to detail that can only thrive if people are truly passionate about what they do and are motivated to achieve the highest standards.

We offer a challenging, stimulating environment in which to grow and we give team members the ability to discover and develop their potential along a variety of career paths. We are committed to providing a safe and healthy environment for all our employees along with fair treatment and just reward.

This policy sets out the areas which the Berkeley Group will focus on in its relationships with its workforce and is an umbrella policy referring to several other issue-specific policies which cover the areas in greater detail. This policy applies to all employees without exception.

In all dealings with employees we will:

- Comply with all applicable laws, rules and regulations
- Effectively communicate any changes in policy and procedures to all of our employees through the company intranet, e-mails, newsletters, employee conferences, training, etc
- Comply with our policies on Business Ethics, Equality and Diversity, and Health and Safety
- Be alert to and act in accordance with our Whistle Blowing policy

The objectives of the employee policy are set out below:

1. Providing a safe and healthy working environment

• Health and safety

It is the policy of the Group to ensure, so far as is reasonably practicable, the health, safety and welfare of its employees while they are at work. For full details please refer to the Health and Safety Policy Statement.

Employee well-being

We acknowledge that a healthy environment involves not just the physical environment but all aspects of the way that employees' work is structured. Therefore we will:

- Provide clear rules and guidance on leave, absence, working hours and overtime, at least complying with legal requirements and striving to go beyond this to good practice
- Understand that employees have other responsibilities outside work and take these into account in order to balance the personal needs of employees with the needs of the business
- o Consider flexible working requests from employees

2. Treating our employees fairly

Equal opportunities

We strive to be an equal opportunities employer, ensuring that all employees and potential employees receive equal treatment regardless of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief (including lack of belief), sex and sexual orientation. As a Group, we will not tolerate discrimination in any form. For full details, please see the separate Equality and Diversity Policy Statement.

• Harassment, victimisation and bullying

We believe that a workplace is somewhere all employees should feel valued and respected. As a Group we will not tolerate any form of bullying and / or victimisation (where a person is subjected to a disadvantage for having complained about discrimination) and / or harassing behaviour. Therefore we will:

- Take all reasonable steps to prevent harassment, victimisation and bullying in the workplace
- Provide a grievance process to deal with complaints as referred to within this policy under discipline and grievances
- Take all complaints seriously and treat them confidentially while protecting employees from retaliation
- Investigate all claims thoroughly and fairly
- o Communicate clearly with employees about acceptable and unacceptable behaviours

3. Encouraging and supporting our employees in their development

• Recruitment and retention

Finding the best people for the job and ensuring that they stay long-term is essential for the Group's continued business success and for the job satisfaction of employees. Therefore we will:

- Conduct performance appraisals and reviews so that any unsatisfactory issue is addressed promptly
- Report employee turnover as part of our monthly Board Reports
- Develop a consistent approach to exit interviews using independent in-house parties, to ensure a better understanding of why some employees choose to leave

• Training and development

We are committed to providing ongoing training and development for all our employees. Therefore we will:

- Ensure that all employees have access to appropriate training for their role. This includes, but is not limited to, an induction, health and safety, IT and sustainability training
- o Operate a graduate training scheme
- Seek to identify skills gaps
- o Record and report yearly on the amount of training our employees receive
- o Aim for continual improvement in our training and development programmes

Employee engagement

An employee policy would be worthless without the support and engagement of the workforce to ensure that it is properly implemented. Therefore we will ensure that any changes in policy and procedures are communicated effectively to all our employees through the company intranet, emails, newsletters, employee conferences, training, etc.

• Discipline and grievances

Even when all efforts have been made to ensure harmonious working relationships, problems sometimes arise. In these circumstances, the Group is committed to dealing with problems in a fair, consistent and conciliatory manner to prevent small issues from escalating. Therefore we will:

- Provide written statements of our dismissal, disciplinary and grievance procedures in all employee contracts
- o Seek to address any disciplinary or grievance problems as soon as possible

Whistleblowing

It is important to the Group that employees feel able to report actions that are illegal, immoral or against stated company policy. For full details please see the Whistle Blowing Policy Statement

4. Recognition and reward

• Pay

We will provide just and equal pay which adequately reflects an employee's contribution to the business' success.

Benefits

We will develop a scheme of non-financial benefits for employees who go above and beyond the call of duty.

Compliance with this policy

The Berkeley Group aims to maintain high standards with regard to its relationship with its employees. Practices of any sort that are incompatible with the Group's principles and policies will not be tolerated. Strict adherence to these principles and supporting policies are a condition of employment with the Berkeley Group and its Divisions. Failure to comply with this policy may lead to disciplinary actions and, where breaches of the law take place, may lead to criminal proceedings against the individual or individuals involved.

Ultimate responsibility for compliance with this policy rests with the Berkeley Group Board.

Signed: - - -

R C Perrins, Main Board Director

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