

**THE BERKELEY GROUP HOLDINGS PLC**  
**HUMAN RIGHTS, MODERN SLAVERY AND CHILD LABOUR POLICY**

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**Human Rights**

The Berkeley Group Holdings plc, all of its subsidiary companies and joint ventures ('Berkeley') are committed to the respect and promotion of human rights in all aspects of business. This includes towards our employees, customers, contractors, suppliers and communities within our area of influence.

This policy applies to all employees, contractors, suppliers, business partners and other third parties working for or on behalf of Berkeley.

We seek to use our influence to promote and protect human rights by establishing clear ethical standards for ourselves and encourage similar standards in anyone who acts on our behalf.

We are committed to developing a culture of respect and support for human rights that seeks to avoid complicity in human rights abuses and to ensure that those in our supply chain are treated with fairness, dignity and respect.

Human Rights are implicitly recognised in everything we do, as shown by our company policies, including but not limited to, our:

- Health and Safety Policy;
- Equality and Diversity Policy;
- Business Ethics Policy;
- Anti-Bribery and Corruption Policy;
- Whistle Blowing Policy;
- Climate Change Policy;
- Sustainability Policy;
- Sustainable Procurement Policy.

We expect the same high standards from all our contractors, suppliers and other business partners. In the event that any alleged breach of human rights should come to our attention then we will investigate and take any appropriate action that we deem necessary.

**Modern slavery and child labour**

We are committed to ensuring that there is no modern slavery or child labour in our supply chains or in any part of our business.

We carry out right to work checks and site inductions for all workers at our construction sites and right to work checks on all of our staff. These act as the Group's first line of defence against

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modern slavery occurring on our sites. Company processes support these checks and we will investigate in the event that there is a suspicion of modern slavery on any site.

We are aware that there is a risk of human rights violations occurring in our supply chains, where we do not have direct control, including the risk of modern slavery and child labour. Materials that are used on site may originate from, or pass through, jurisdictions where modern slavery and child labour exist.

To mitigate this risk we aim to:

1. engage in an open and honest dialogue with our suppliers, contractors and sub-contractors about the risks of modern slavery and child labour occurring in our supply chain;
2. assess key social and ethical impacts of suppliers and contractors within the tendering process;
3. incorporate consideration of social and ethical issues into the initial contractor approval process;
4. set out in all new contracts the standards that we expect from all third parties that provide goods or services to us;
5. train relevant employees on recognising and reporting modern slavery.

In addition to the above, we will report annually on the ongoing steps that we are taking to tackle the risk of modern slavery and child labour in our supply chain.

#### **What we expect of our employees and those working on our behalf**

The prevention, detection and reporting of human rights and modern slavery breaches in any part of our business or supply chains is the responsibility of all those working for us or under our control.

You are encouraged to raise concerns about any issue or suspicion of modern slavery and child labour in any part of our business or supply chain at the earliest possible stage.

In accordance with our Whistle Blowing Policy, we aim to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting a genuine suspicion that modern slavery, use of child labour or any human rights abuses are taking place in our business or in any part of our supply chain.

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**Breaches of this policy**

Any employee who engages in behaviour that they know, or should reasonably know, will lead to a breach of human rights may face disciplinary action up to and including dismissal.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

This policy does not form part of any employee's contract of employment and we may amend it at any time.



**R C Perrins**  
**Managing Director**

August 2019