



Building Homes Strengthening Communities Improving Lives

Who we are

Our purpose

To build quality homes, strengthen communities and improve people's lives.



Our vision

To be a world-class business, trusted to transform the most challenging sites into exceptional places and to maximise our positive impact on society, the economy and the natural world.



Our values



Have integrity



Be passionate



Think creatively



Respect people



Excellence through detail



Cover images: Prince of Wales Drive, Battersea; West End Gate, Paddington



The Green Quarter, Ealing

The Berkeley Group Holdings plc, its subsidiary companies and their joint ventures ('Berkeley'), builds homes and communities across London, Birmingham and the South East of England. This is Berkeley's Modern Slavery Statement for 2023/24 and it is published in compliance with the Modern Slavery Act 2015.

The actions mentioned in this statement are undertaken at parent company or subsidiary and joint venture company level as appropriate to the action. The size and complexities of Berkeley's developments mean that it can take a number of years for them to reach completion.

The turnover of its subsidiary companies can vary from year to year, taking them above and below the £36 million modern slavery reporting threshold. For that reason, Berkeley makes this modern slavery statement on behalf of all Berkeley subsidiary companies and joint ventures, all of whom adopt its terms.

This statement covers Berkeley's financial reporting year of 1 May 2023 to 30 April 2024, is signed by the Chief Executive and has been approved by the Board on 21 October 2024.

Our Business

Berkeley is made up of six autonomous brands:

Berkeley Homes; St George; St James; St Joseph; St William and St Edward which is a joint venture with M&G Investments. Berkeley operates through these autonomous divisions and operating companies, each with its own board of directors.

Berkeley is engaged in residential-led, mixed use property development in London, Birmingham and the South-East of England. We aim to transform the most challenging and complex brownfield sites into welcoming and sustainable places to live and work.

The average monthly number of persons employed by Berkeley during 2023/24 was 2,717 and an average of 8,821 contractor staff worked across Berkeley's 52 live construction sites each month. In 2023/24 Berkeley delivered 3,927 homes.

Berkeley also has eight overseas sales and marketing offices in Bangkok, Beijing, Chengdu, Dubai, Hong Kong, Shanghai, Shenzhen and Singapore. These overseas offices are not involved in any aspect of construction or development but focus primarily on customer liaison. The total number of employees based overseas in the year was 52. All Berkeley construction operations are UK based.

The developments that Berkeley creates range in size from a small number of homes to complex mixed-use urban regeneration schemes with many thousands of homes. The types of homes we build include city apartments and traditional family homes, as well as student and senior living accommodation.

Our mixed-use developments incorporate offices, shops, leisure and community facilities, hotels and restaurants. We sell our homes and commercial space to a broad range of customers: private buyers; housing associations; universities; investors and commercial occupiers.

Our brands

100% owned:

Berkeley
Designed for life

St Joseph
Designed for life

St George
Designed for life

St William
Designed for life

St James
Designed for life

Joint venture:

St Edward
Designed for life



Our Procedures

Over the last year, Berkeley made good progress against its commitments. These built on the processes and procedures already in place that impose contractual commitments, and the monitoring of contractors appointed by us on our developments in addition to our existing training and awareness programmes. Berkeley's procedures include:

1

Pre-qualification checks on all contractors that wish to be included on our approved database or undertake work on our behalf, with specific questions in relation to their approach to combatting modern slavery.

2

Additional questions requiring a higher level of detail on their approach is required as part of our tender scoring matrix which is a tool used to assess contractors based on overall value rather than cost alone.

3

Our construction contracts, purchase order terms and small contract terms include robust anti-slavery and child labour provisions that not only bind Berkeley's direct contractors and suppliers but also impose obligations on them to cascade the provisions down the supply chain.

4

Specific guidance on modern slavery for factory visits for teams across Berkeley carrying out due diligence at both UK and overseas facilities.

5

All new starters on our construction sites attend an induction which highlights modern slavery and how to raise concerns. This is attended by our internal and contractor workforce.

6

All of our sites display posters with the details of helplines available to raise any issues.

7

Each site has a modern slavery lead (the most senior person on site) that has had additional training on the possible signs of labour exploitation and forced labour.

8

All staff have completed mandatory e-learning on modern slavery which is required to be refreshed every two years.

Our Supply Chain

Berkeley has identified its salient modern slavery risks. The procurement of materials and the supply of labour are two key areas within the supply chain that Berkeley has identified as presenting a risk of modern slavery.

Berkeley's supply chain is large and complex to reflect the requirements of its different developments. It primarily consists of 1,100 approved, directly appointed contractors, who undertake work for us on a supply and install basis, the majority of which are based in the UK. Supporting this operational activity are approximately 600 manufacturers and suppliers, who we trade with either on a direct or indirect basis.

In November 2023 Berkeley held its first Group-wide supply chain conference, bringing together more than 170 trade contractors, manufacturers and consultants to promote collaborative working and strengthen relationships. We used this opportunity to emphasise our commitment to combatting modern slavery and discuss our aims and actions with those working on our sites. We presented to attendees on the risk of modern slavery and the importance to Berkeley of working together to combat this issue.

Materials used in the construction of Berkeley's developments are procured from around the world both directly and via our contractors. Berkeley risk assesses each contractor and where they source materials, always mindful of countries where increased risks of modern slavery and/or child labour have been identified.

Berkeley sources limited supplies of building materials directly from manufacturers and suppliers, but the majority of the materials used in our construction operations are procured by the trade contractors engaged to carry out the building works. The manner in which these materials are sourced by those contractors forms part of the embedded process for risk assessing and monitoring those contractors.

In addition, over the last year, Berkeley has identified the construction materials it most commonly uses and put in place a manufacturer framework agreement to enable purchase of those materials not only by itself but also by its contractors. All manufacturers must meet stringent due diligence requirements before signing the framework agreement. This includes a modern slavery risk assessment. Each manufacturer who becomes

a participant in the manufacturer framework is contractually required to meet the same stringent modern slavery compliance obligations as are required of Berkeley's contractors.

Berkeley has identified the recruitment of labour and specifically migrants and temporary labour as a human rights and modern slavery risk. In addition to Berkeley staff, the construction operatives working on our sites are engaged through trade contractors with whom Berkeley contracts. Accordingly, Berkeley is not directly involved in the recruitment process. Berkeley's modern slavery risk assessment and engagement with industry peers and human rights experts through membership of formal groups and hubs has identified labour supply by contractors as a higher human rights risk not least because some of this labour is presently from outside the UK.

Berkeley mitigates this risk by contractually requiring its contractors to comply with all modern slavery legislation and, in addition, Berkeley carries out its own right to work checks on all workers on our sites. These checks are carried out using a Government certified third-party digital identity



Supply Chain Conference



Oval Village

service provider during a mandatory in-person induction process and requires each individual to provide photographic identification.

As a consequence of the subdued construction market conditions putting increased commercial pressure on companies to tender competitively for work, Berkeley has identified that there is greater risk that its appointed contractors may consider sourcing lower cost materials from alternative suppliers. Examples of this include plasterboard and bricks from Turkey, glass from Dubai, bricks from South Africa and steel from South East Asia.

Berkeley is aware that such a risk may require greater diligence on its part than the contractual obligations it has already secured from its contractors. Berkeley is cognisant of the associated increased modern slavery risk this may create and has worked closely with its appointed contractors to ensure full due diligence is undertaken and modern slavery compliance demonstrated when their contractors engage with new suppliers.

We collaborate with industry and are part of the Supply Chain Sustainability School's Built Environment Against Slavery Group,

the largest anti-slavery collaboration in the UK built environment. Membership of such groups improves our understanding of risks as they emerge, through lessons learned shared by peers or intelligence shared by experts.

In addition, we improve our understanding through attending industry events and conferences such as CCLA Investment Management's roundtable discussion on modern slavery and exploitation in construction which took place in April 2024.



Prince of Wales Drive, Battersea

Progress against 2023/24 Commitments

- Raise awareness of modern slavery in our Group Supply Chain by engaging face to face with our key trade contractors, manufacturers, merchants and consultants.
- Continue to work with our supply chain to understand our key sources of materials. This will include considering enhanced modern slavery due diligence on our supply chain and the exploration of technologies that may be able to assist with this process.
- Analyse the use of overseas third parties by our consultants and take action where relevant to address any identified risks.
- Continue to monitor and assess the ongoing impact of Brexit on the labour forces coming to work on our sites and assess whether this will have any impact on the risks of modern slavery relating to the provision of labour and the procurement of materials.
- Participate in the Supply Chain Sustainability School's Modern Slavery Group to better understand key issues and actions undertaken across the industry.

● Achieved ● Ongoing

Our Policies

Berkeley is committed to the respect and promotion of human rights and the avoidance of modern slavery and child labour in all aspects of business. This includes towards our employees, customers, contractors, suppliers and communities within our area of influence. Human rights are implicitly recognised in everything that Berkeley does, as demonstrated in our company policies, notably our Human Rights, Modern Slavery and Child Labour Policy, and our Business Ethics Policy. Furthermore, our Whistleblowing Policy highlights modern slavery risk as an unethical risk that is within the scope of the policy.

Berkeley requires all employees and anyone conducting business on behalf of Berkeley to comply with its Human Rights, Modern Slavery and Child Labour Policy and Business Ethics Policy. All employees are required to confirm that they have read and understood these Berkeley policies. Non-compliance can result in disciplinary action up to and including dismissal.



Berkeley expects equivalent standards of conduct from its business partners. Non-compliance with either the Human Rights, Modern Slavery and Child Labour Policy or Business Ethics Policy by anyone working for or conducting business on behalf of Berkeley can result in termination of their contract.

In 2023, Berkeley joined a construction sector peer to peer working group with representatives from Laing O'Rourke, Skanska and Morgan Sindall. Membership of this group has enabled us to share our approach and discuss the approaches adopted by others to combat modern slavery.

Our focus this year has been the production of a publicly available short video to be used in inductions to raise awareness of modern slavery and labour abuse throughout the industry. In collaboration with Unseen, the filming was part-funded and developed by Berkeley and took place at a Berkeley site. The purpose of the video is to demonstrate the ways in which labour exploitation can take place in the construction industry.

The video is due to be published in October 2024. The group also submitted suggested amendments to the questions included in the Common Assessment Standard which is a standard contract evaluation assessment method for the construction industry published by Build UK.

It is our intention to build on this enhanced knowledge and engagement as we update our Human Rights, Modern Slavery and Child Labour Policy in 2024/2025.

Berkeley's policies that are specifically relevant to combatting the risks of modern slavery:

Human Rights, Modern Slavery and Child Labour Policy

- Berkeley strives to engage in an open and honest dialogue with our manufacturers, contractors and sub-contractors about the risks of modern slavery and child labour occurring in our supply chain.
- Berkeley assesses manufacturers and contractors on key social and ethical issues (assessing and considering modern slavery, workforce development/training, sustainability and use of overseas contractors) within the early stages of the contracting process.
- Berkeley incorporates consideration of such social and ethical issues into the contractor evaluation and appointment process.
- Berkeley contractually incorporates its anti-slavery and child labour compliance provisions and requisite standards into its contracts for goods or services.

Business Ethics Policy

- Berkeley's stated objective is to comply with the protection of human rights and avoidance of modern slavery and child labour in all its dealings.
- In all third-party relationships, Berkeley will require our business partners to operate with values and principles equivalent to ours, comply with our Human Rights, Modern Slavery and Child Labour Policy (amongst others) and where possible impose sanctions where there has been a breach.

Whistle-blowing Policy

- The policy applies to all employees, workers, agents, contractors, sub-contractors, suppliers (at any tier of the supply chain), business partners and customers of Berkeley.
- Berkeley makes explicit reference to concerns that relate to unethical practices, such as modern slavery, acknowledging its importance.



Progress against 2023/24 Commitments

- Update the Group's Human Rights, Modern Slavery and Child Labour Policy.



● Achieved ● Ongoing

Due Diligence and Risk Assessment

Berkeley has undertaken a complete review of its risk assessments of the modern slavery risks to the business and consequently has affirmed that its most salient modern slavery risk arises in the appointment of contractors and the procurement of materials. While each of Berkeley's relationships in these groups are managed through contracts that are subject to termination in the event of non-compliance with the requisite modern slavery laws and standards. This is backed up by detailed due diligence undertaken in respect of each of these areas and the associated mitigations identified.

Appointment of Contractors

Berkeley's contracts include robust anti-slavery and anti-child labour provisions that not only bind Berkeley's direct contractors and suppliers but also impose equivalent obligations on that contractor / supplier when contracting and dealing with their own suppliers, Berkeley's indirect supply chain. These provisions have been implemented throughout the entire construction supply chain and demonstrate Berkeley's commitment to combatting modern slavery and child labour.

Berkeley operates robust competency and pre-qualification checks on all contractors that wish to be included on our approved contractor database (enabling them to be tender for and be contracted for work). In addition, Berkeley conducts due diligence on workers' contracts; asking the potential contractor detailed questions about its policies and procedures and how they identify and manage the risk of

modern slavery within their business and supporting material supply chain. Berkeley seeks evidence that the contractor is taking proper measures to prevent modern slavery in their business and in their supply chain and seeks specific assurance and associated evidence in relation to workers' contracts down the supply chain.

Furthermore, all contractors are provided with access to Berkeley's Supply Chain Portal which includes copies of our Human Rights, Modern Slavery and Child Labour Policy, Business Ethics Policy and Whistle-blowing Policy. In accordance with our contractual requirements, contractors are required to review the policies via the Supply Chain Portal and confirm acceptance of their terms each time they are successful in securing work from us.

Procurement of Materials

Berkeley has made the strategic decision to standardise common base materials and manufacturers across the group where possible. This approach creates closer and more collaborative relationships, helping to mitigate risk and enhance resilience.

All manufacturers involved with this process are required to complete the detailed modern slavery due diligence questionnaire, equivalent to that used for contractors (i.e. workers' contracts, policies and procedures, convictions, identification and management of related risks). As with the contractors, the responses from potential suppliers are evaluated and assessed.

Following standardisation across 10 key product groups, covering materials such as pipework and drainage, blocks, insulation, dry lining and timber joists, we have streamlined the suppliers and materials used across Berkeley, improved supply chain mapping of both the country of manufacture and raw material origin, and gained a better understanding of the geographical risks of our supply chain to inform the proactive actions required for future years. Berkeley maintains a Technical Steering Committee chaired by a member of the Executive Committee that is responsible for the production of Berkeley's Technical Standards for 10 product groups. Berkeley's Technical Standards inform product choice, improve business efficiency and provide a framework through which Berkeley is able to investigate its material sourcing strategies more closely, including in the context of modern slavery.

Teams across Berkeley carry out factory visits within our supply chain for a number of reasons, including to conduct due diligence on a contractor, to review factory facilities, to observe the manufacturing process and working conditions, to review the quality of products and to attend design meetings. We have produced guidance for staff visiting factories, which requires them to be alert and educates them in recognising the signs of modern slavery and also requires them to complete an assessment during the visit which is then reviewed centrally.



Construction activities at White City Living

Berkeley has designated specific staff to liaise with each key trade contractor. These Berkeley staff provide support to address queries and issues that sit outside of a specific project/contract. As part of this, Berkeley has identified 10 key trades including frame, façade, mechanical, electrical and brickwork. Within these trades, Berkeley conducts a review of contract awards across the Group, alongside spend profile and performance, allowing us to identify our 94 key trade contractors. Modern slavery is included as a specific agenda item for in depth discussion with our key trade contractors. Berkeley will continue to engage with our key trade contractors on modern slavery to enhance awareness and to discuss the mitigation of modern slavery risks including assessing the effectiveness of measures implemented.



Broadway East, Bethnal Green

Progress against 2023/24 Commitments

- Ensure that modern slavery continues to be a key consideration as part of our ongoing standardisation of both common base materials and manufacturers.
- Identify any follow up actions following the completion of our roll out of our Modern Slavery questionnaire.
- Review our supply chain assessment processes, covering contractors, materials and plant, to ensure that the way we assess companies during onboarding and as part of the contract award process reflects the risks of modern slavery.



● Achieved ● Ongoing

Effectiveness and Training

Effectiveness

Since the Modern Slavery Act 2015 came into effect, Berkeley has received three whistle-blowing complaints that alleged modern slavery, two of which proved to be unfounded claims, with one currently being investigated.

Of the two unfounded complaints, one related to right to work checks that a sub-contractor required from their employee and the other related to the value of work that a sub-contractor applied to work by its employees. Berkeley investigated both these complaints with our contractors and neither of them gave rise to any concerns that there had been modern slavery taking place. The report and investigation of these matters enabled Berkeley to work with its contractors to understand the matters subject to the complaint. Berkeley continues to encourage the reporting of modern slavery concerns in its policies and demonstrates this on site, through site inductions and through our site poster campaigns.

In 2022, following the completion of our mandatory modern slavery e-learning module, a member of our staff followed our internal process to report a concern about a contractor's workforce to their Site Modern Slavery Lead which led to a report to the UK Modern Slavery Helpline. As a result of our report, this concern is currently under investigation by the police. Berkeley has contacted the police and the Helpline for updates and remains to be informed as to whether our concern was well founded.

Nonetheless, we have supplemented our communication and training material to further ensure that our employees and wider workforce are aware of the signs and the support available for victims of modern slavery and labour exploitation. The detection and reporting of human rights and modern slavery breaches is important to Berkeley and all staff members are encouraged to raise concerns in any part of our business or supply chain.

We are encouraged by the effectiveness of our internal training and will continue to support any investigation into human rights violations associated with our operations.

In March 2024 Berkeley responded to the Government's Call for Evidence to address the topic of the efficiency of reporting in relation to the Modern Slavery Act 2015 referring to the apparent failure to respond to our notification. As over two years has passed since Berkeley's notification, it is apparent that the external investigations by the police and the Helpline have not been concluded within a timely manner. Accordingly, Berkeley supports additional focus in the UK on the process for how the relevant external organisations undertake investigations/reviews of potential issues identified as well as how they feed back to the organisations who make such reports.

Progress against 2023/24 Commitments

- Roll out on-line refresher training for staff.
- Extend the group of staff members who have attended in-person training on modern slavery to include mental health first aiders and health and safety staff.
- Continue to engage and draw on the experiences shared across the industry through the peer-to-peer working group and Berkeley's internal Modern Slavery Working Group.



- Achieved
- Ongoing



Training

All our employees are required to complete an e-learning training course on modern slavery. The e-learning includes an overview of the issue and the relevance to our industry and informs staff members of signs they could look out for and how to report any concerns. Staff are now required to undertake refresher e-learning on modern slavery every two years. Berkeley monitors and proactively manages completion rates.

Our 2023/24 commitment to extend the group of staff members who have attended in-person training on modern slavery to include mental health first aiders and health and safety staff, was replaced by the creation and funding of the awareness video to be used by the construction sector, in collaboration with the peer-to-peer working group and in partnership with Unseen. This has deferred internally extending Unseen's in person training to other areas of Berkeley's workforce, but this will be scheduled in the future.

On our sites: Inductions

It is a Berkeley requirement for all sites to deliver an 'in person' induction that includes a section on modern slavery and labour exploitation. During 2023/2024, we amended the wording of this

induction to replace 'modern slavery' with 'worker welfare'. The purpose of this change was to widen the focus to include acts of exploitation, such as unlawful deductions from wages or the absence of an employment contract and thus avoid using a term that victims of such abuses may not relate to.

The Berkeley staff delivering the 'in person' site inductions receive additional training and Berkeley provides an information pack that documents our approach and procedures relating to modern slavery and labour exploitation.

On our sites: Raising Awareness

We continue to display on-site modern slavery posters to raise awareness of signs of modern slavery and provide details of an independent charity helpline. This year we have produced an additional poster to help our workforce understand their employment rights under UK law.

This includes a QR code to the Gangmaster and Labour Abuse Authority's workers' rights webpage. These posters are displayed on all Berkeley sites and are in English, Romanian, Albanian and Polish which are presently the most commonly spoken languages on

our sites. Additionally, we ensure that the 'SOS' hand signal initiative produced by Stronger Together which aims to act as a tool to enable victims of modern slavery to seek help is communicated through toolbox talks and signage on site.

On our sites: Raising a Concern

Part of our procedure to report any concern includes each of our sites having a Site Modern Slavery Lead, a role which is automatically assigned to the most senior person on any site to ensure that we have clearly identifiable individuals who are responsible for reporting modern slavery and who can act as a point of contact for raising concerns.

In June 2023, we supplemented our e-learning with organised half day sessions of face-to-face training for over 60 senior staff members including all of our Site Modern Slavery Leads which was delivered by Unseen, the anti-slavery charity running the Modern Slavery Helpline. The discussion points raised during the training sessions help to inform the action plan for the Berkeley Group Modern Slavery Working Group. An example of this was the need to widen awareness of examples of labour exploitation, rather than focusing on extreme cases of modern slavery, which are often difficult for victims to relate to.

Effectiveness and Training continued

Corporate Leadership and Continuous Improvement

Berkeley's approach to the management of modern slavery risk is implemented by a cross-functional Modern Slavery Working Group. Chaired by the Responsible Business Executive, the Group includes representatives from our Commercial, Construction, Legal and Responsible Business teams.

The Group meets regularly (usually six-weekly) to ensure that Berkeley is effectively monitoring and managing its modern slavery risks and considering its modern slavery risks in the context of the wider market and economic conditions as they evolve with the object of assuring the Executive Committee that Berkeley's processes deliver effective modern slavery risk management that aligns to the needs of the business.

Berkeley continues to issue updated guidance on how to tackle the modern slavery risks that may arise through our production, construction and commercial activities through the relevant Executive Committees.

This continuing work includes bulletins highlighting examples of modern slavery cases involving the construction industry to increase awareness of modern slavery risks, provide information on how to identify them and how to report any concerns.

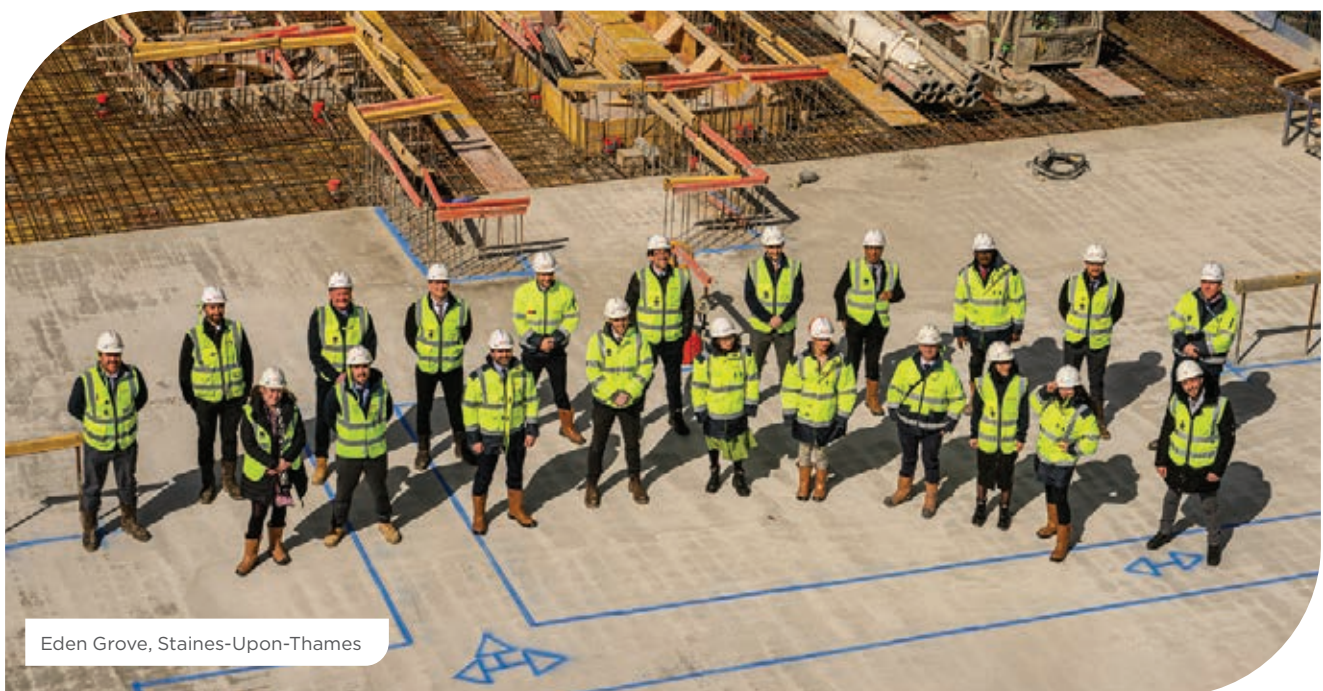
Berkeley continues to give further thought to other key groups within our business that may benefit from receiving this guidance and will review cases and issue bulletins on combatting modern slavery where relevant.

Berkeley is a partner of the Considerate Constructors Scheme (CCS) therefore each of Berkeley's sites is registered with the CCS. Every site registered with the CCS is subject to an external audit twice a year.

This year, Berkeley was pleased to note that the CCS increased its focus on combatting modern slavery by adding a question to their checklist on how the organisation responsible for every site audited has ensured the competency and legitimacy of the workforce on the site.

The approach of the CCS means that the processes and procedures in relation to workforce competence and legitimacy at each Berkeley site are subject to external audit. Additionally, the CCS has launched an extensive toolkit on the risks associated with illegal workers which Berkeley has promoted across its businesses led by the Executive leadership.

Berkeley has continued to be an active participant of a construction industry peer to peer working group. Further details are provided on page 07.



Commitments for 2024/25

Berkeley will continue to combat the risks of modern slavery and child labour in its supply chain and to their eradication if found by undertaking the following actions in the coming year:

1

Contribute to the Supply Chain Sustainability School's delivery of an industry-wide conference and collaborate on industry-wide resources to be published nationally.

2

Roll out the industry awareness video on labour exploitation referred to above in partnership with Tier 1 industry peers and Unseen, to be used by the entire built environment sector.

3

Update the Group's Human Rights, Modern Slavery and Child Labour Policy.

4

Review and revise our Modern Slavery Awareness Training to incorporate the most recent industry wide content and learning and update and complete the in-person training of mental health first aiders and health and safety staff delivered on site.

5

Incorporate Modern Slavery Risk Assessment Training into new Berkeley training for all commercial employees to be led by an independent law firm.

6

As Berkeley's common materials strategy has evolved, its value in relation to modern slavery risk assessment and compliance has been demonstrated and we have identified further materials to be added to this framework. Berkeley's work in this area continues to be a priority for 2024/25.

Signed



R C Perrins | Chief Executive

21 October 2024

For and on behalf of the Board of The Berkeley Group Holdings plc for the year 2023/24



The Berkeley Group Holdings plc

Berkeley House
19 Portsmouth Road
Cobham
Surrey KT11 1JG

www.berkeleygroup.co.uk

Registered number: 5172586

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