

Anti Bribery and Corruption policy

Introduction

Introduction This Anti-Bribery and Corruption Policy is supported by the Board of Barratt Redrow Plc ("the Group") and shall be reviewed annually. This Policy sets out the Group's commitment to preventing bribery and corruption in all of its business activities.

Objectives

This Policy covers all of the Group's business activities and applies to all employees, and anyone conducting business on behalf of the Group. This Policy provides guidance on the way all such employees and representatives are expected to act with integrity, fairness and in compliance with ethical, legal and regulatory requirements as well as the Group's Purpose. All business partners of the Group including agents, joint venture partners, sub-contractors and suppliers, are also expected to adhere to the principles of this Policy in their dealings with the Group.

Policy

The Group expects all of its employees and representatives to prevent all forms of bribery and corruption when carrying out their duties on behalf of the Group.

In particular our employees and representatives must ensure that:-

- Honesty, integrity and fairness is demonstrated in all aspects of the Group's business dealings.
- Appropriate standards of professionalism and ethical

business conduct are maintained across all Group activities.

- The Group operates with appropriate transparency in all of its business dealings.
 - The Group does not, directly or indirectly, offer, promise, give, accept or demand a bribe, facilitation payment, kickback or other improper payment or undue advantage (including excessive gifts and hospitality) in order to obtain or retain business, or gain an improper advantage.
 - The Group does not offer, nor give in to demands, to make illicit or illegal payments to agents, public officials (at whatever level), or the employees of business partners or anybody else that the Group does business with.
 - The Group engages and remunerates agents, consultants and other third parties only for legitimate services and adopts appropriate transparency in its approach.
 - The Group adopts management control systems that discourage bribery and corruption and adopts financial and tax accounting and auditing practices that prevent the establishment of "off the books" secret accounts or the creation of documents which do not properly and fairly record the transactions to which they relate.
 - The Group makes charitable contributions only on the basis that the registered charity status of the receiving organisation is verified, that the donation is transparent and properly recorded, and that all such donations meet legal, regulatory and ethical standards.
 - The Group adheres at all times to legal and statutory requirements and authorisation limits in respect of political expenditure and political
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contributions or donations to candidates for public office, political parties or political organisations. Employees must adhere to the Group's policy on conflicts of interest if they offer support and contributions to political groups in a personal capacity.

- Awareness of the need to combat bribery and corruption is raised amongst the Group's business partners by publication of this Policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption.

Links with other Group Policies

This Policy should be read alongside other relevant Group policies, including the Ethics Policy for detailed guidance on conflicts of interest and the Group Policy on Gifts and Hospitality for detailed guidance on gifts, hospitality, expenses, charitable contributions and sponsorships.

Compliance with this Policy

The Group does not tolerate bribery or corruption in any form and has a 'zero tolerance' approach to any breach of this Policy. Any breach of this Policy by (i) any employee will be a breach of that employees' contract of employment, which may result in disciplinary action including dismissal of that employee, and (ii) a business partner may lead to sanctions, such as civil charges. Breach of any anti-bribery and corruption laws or regulations may also amount to criminal misconduct and lead to criminal prosecution, monetary fines and/or even imprisonment being enforced against any individual responsible and/or the Group. Each

employee must be aware of this Policy and complete a mandatory e-learning module upon employment within the Group and at regular intervals. Directors and senior managers should promptly report any suspected breach of this Policy to the Head of Legal, the Head of Internal Audit or the Company Secretary.

If employees have concerns or questions about this Policy, they should be raised with their line manager, the Head of Legal, the Head of Internal Audit or the Company Secretary. Should contact through these channels be deemed inappropriate, contact can be made with the Chair of the Board, the Chair of the Audit Committee or the Senior Independent Director. Alternatively the query of concern can be raised with the Group's confidential Whistleblowing Helpline (provided by Safecall) on 0800 915 1571 or email: barratt@safecall.co.uk.

This policy is reviewed annually and is approved by the Group Board. It is communicated to key stakeholders and is available on our website.

David Thomas
Chief Executive
DATE 10 December 2024