

# Corporate Criminal Offence policy

## Introduction

This Corporate Criminal Offence policy is supported by the Board of Barratt Redrow plc (“**the Group**”) and shall be reviewed from time to time.

This policy sets out the Group’s zero tolerance approach to, and the prevention of facilitation of, tax evasion.

This policy applies to all persons associated with the Group, whether based in the UK or abroad, including but not limited to, its:

- employees
- suppliers
- contractors and subcontractors
- agents, and
- any person acting on behalf of the Group.

## Objectives

The purpose of this policy is to communicate the Group’s approach to preventing the criminal facilitation of both UK and foreign tax evasion.

This policy:

- (a) sets out our responsibilities, and the responsibilities of those working for us on our behalf, in observing and upholding our position on bribery and corruption, specifically tax evasion; and
- (b) provides information and guidance to those working for and on our behalf on how to recognise and deal with tax evasion.

## Policy

- It is our policy to conduct all our business activities in an open, honest and ethical manner.
- We are therefore committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. As part of this commitment, we will implement and enforce effective systems to counter the facilitation of tax evasion.
- We will uphold all laws relevant to countering bribery and corruption, including tax evasion, in all territories that we operate.
- We recognise that we are bound by UK laws, which includes the Criminal Finances Act 2017 (“CFA 2017”) and the two strict liability corporate offences therein: the facilitation of UK tax evasion and the facilitation of foreign tax evasion.
- Where we identify that a person associated with the Group has facilitated tax evasion, they will be reported to the relevant authorities.
- We will endeavour to not use the services of those who are unable to provide assurance that they have reasonable procedures in place to prevent the facilitation of tax evasion.
- The Group adopts the following six guiding principles when developing processes and procedures within its business to prevent the criminal facilitation of tax evasion:
  - **Risk assessment** – a risk assessment has been undertaken to assess the nature and extent of the Group’s exposure to the criminal facilitation of tax evasion by persons associated with it. This risk assessment will be reviewed every year, or earlier where there is a material change

- in the nature of its business activities.
- **Proportionality of risk-based prevention procedures** – the procedures adopted to prevent the criminal facilitation of tax evasion will be proportionate to the level of the risk of the associated persons committing tax evasion facilitation activities.
  - **Top level commitment** – We take a zero-tolerance approach to tax evasion and the facilitation of tax evasion, whether under UK law or under the law of a foreign country. This approach will be communicated to all associated parties at the outset of our business relationship with them and as appropriate thereafter.
  - **Due diligence** – Procedures are reviewed to ensure appropriate due diligence is undertaken as part of normal business activities to prevent the criminal facilitation of tax evasion.
  - **Communication and training** – We will raise awareness both within and outside the Group of our zero-tolerance to tax evasion and the responsibility of our associates to prevent the criminal facilitation of tax evasion.
  - **Monitoring and review**
    - **Ongoing monitoring:** the procedures implemented to prevent the facilitation of tax evasion will be monitored on an annual basis to ensure that they are operating correctly and remain appropriate to the level of risk foreseen.
    - **Governance policies:** the following policies and procedures have been adopted by the Group:
      - Anti-bribery and corruption policy
      - Whistleblowing policy providing protection to employees reporting wrongdoing or potential wrongdoing.
      - New employee process within HR and payroll/finance.
      - Processes working with new suppliers and contractors, including requests for changes of details,
      - Processes for the identification of customers acquiring homes, emphasis being placed on customers residing in locations known to be high risk in terms of tax evasion.

## Compliance with this Policy

Where tax evasion has taken place and it is shown that we don't have reasonable procedures to prevent the facilitation of tax evasion, the Group can face an unlimited fine, exclusion from tendering for public contracts, and considerable damage to our reputation.

The Group must therefore take its legal responsibilities around this matter very seriously.

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.

The Chief Financial Officer ("CFO") has primary and day-to-day responsibility for implementing this policy, monitoring its application and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure

that they are effective in countering the facilitation of tax evasion.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

It is a criminal offence to aid or facilitate tax evasion. Individuals found guilty can be punished by imprisonment and/or a fine. Where an individual is an employee, director or officer of the Company, they may face disciplinary action, including dismissal for misconduct or gross misconduct. Where the individual is a third party, the relationship may be terminated with immediate effect.

The prevention of the facilitation of tax evasion is the responsibility of all those working for, or are working on behalf of or under the control of the Group. All persons are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All persons must notify an appropriate person as soon as possible if you believe or suspect that a breach or conflict with this policy has occurred, or may occur in the future.

An **appropriate person** is any of the following:

- Your line manager (this doesn't have to be your immediate line manager).
- The Group Director of Tax.
- The Group Director of Finance.
- The Chief Financial Officer.
- Head of Internal Audit.
- The Chair of the Group's Audit Committee.

Or contact the confidential Whistleblowing helpline, Safecall at 0800 915 1571 or email them at: [barratt@safecall.co.uk](mailto: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.**

**Mike Scott**  
**Chief Financial Officer.**  
**DATE 10 December 2024**