



Introduction

This is Barratt Redrow plc's ("Barratt Redrow's" or "The Group's") Modern Slavery and Human Trafficking Statement for the period 1st October 2024 – 30th September 2025 published in compliance with the Modern Slavery Act 2015 (the 'Act') within six months of our year end 29th June 2025. It sets out the steps taken by Barratt Redrow and our relevant subsidiaries or entities in which we have an interest (as listed in the **Appendix**), to prevent human trafficking and slavery in our business and supply chain. This statement is reviewed and published annually on our **plc website**.



1. About Barratt Redrow plc

Barratt Redrow plc was formed in October 2024 when Barratt Developments plc completed its acquisition of Redrow. We are the country's leading national sustainable housebuilder.

Our purpose is to make sustainable living a reality, building strong communities. Our principal activities comprise acquiring developable land, obtaining planning, and building high quality homes and communities. All of our operations and activities are UK-based. Last year we had an annual turnover of £5.6 bn and operated across 32 divisions, building 16,565 high quality new homes under three core brands – Barratt Homes, David Wilson Homes and Redrow.

Oregon Timber Frame Ltd is our timber frame manufacturing business, operating solely for the Group. It fulfils part of the Group's main housebuilding business's timber frame supply needs. BD Living is a division within the Group, responsible for manufacturing and supplying fitted wardrobes to our housebuilding business. Wilson Bowden Developments Limited

is responsible for our commercial developments, which account for 0.3% of our revenue. Main contractors are used for the delivery of Wilson Bowden's commercial developments. With the acquisition of Gladman Developments in January 2022, Barratt also operates a land promotion business under the Gladman brand.

We directly employ 7,756¹ people including 465 graduates, apprentices and trainees and during the year the business was responsible for 67,850 indirect and induced employment opportunities through its subcontractors and suppliers.

Information about the diversity of our workforce can be found on [our website](#).



2. Our commitment

We are committed to preventing, identifying, managing and mitigating modern slavery risk (including human rights violations, child and forced labour or human trafficking in any form), in our own operations and our supply chain.

Through our **Building Sustainably framework** we commit to 'Valuing human rights and championing fairness by preventing modern slavery within our supply chain and being a committed Living Wage Employer.'

Our **human rights approach** sets out our commitment to respecting labour and human rights across our value chain. It supports our commitment to the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on the Fundamental Principles and Rights at Work, and the Ethical Trading Initiative Base Code.

It outlines our commitment to human rights due diligence and our responsibility to provide remedy, where appropriate. We are committed to working with our suppliers in remedying shortcomings and driving continuous improvement.

The approach encompasses the human rights of our employees, other persons working for us or on our behalf as well as those impacted by our operations. It was developed in consultation with the Sustainability, Human Resources, Procurement, Commercial, Construction, Legal and Safety, Health and Environment (SHE) departments, and was reviewed by

the Human Rights Steering Committee and signed off by the Board of Directors. We also had expert input from the **Supply Chain Sustainability School** in drafting it.

Implementation of our commitment to respect human rights and combat modern slavery across our products and materials supply chain has involved engagement with Procurement Category Managers, and suppliers themselves. We are committed to ensuring our business policies, procedures, requests and contracts do not place unnecessary demands on our suppliers which could potentially make it difficult for

them to respect human rights in their own value chain. Such practices could include late payment of invoices, low payment, and high-pressure delivery demands.

Our **Sustainable Procurement Policy** specifies that suppliers must maintain their own ethical sourcing policies and apply these standards to their own business, across all of their workers, suppliers and any subcontractors engaged in their supply chain.

3. Governance

Our Chief Executive, on behalf of the Board, has responsibility for this statement and our Group Human Resources Director is the Executive Sponsor. Individual Group Functional Directors are accountable for compliance with the Act. Divisional Managing Directors are responsible for their local supplier relationships and compliance with the requirements of the Act.

The Group's Board Sustainability Committee, chaired by a Non-Executive Director and attended by three additional members of the Board meets quarterly. This Committee is responsible for scrutinising the sustainability strategy, which includes modern slavery risk; ensuring our Building Sustainably Framework is embedded across the Group's operations; and ensuring that the Group is mitigating its sustainability risks and leveraging opportunities in the short, medium and longer term.

In 2024 we established our internal Human Rights Steering Committee, sponsored by our Group Sustainability Director and our Group Human Resources (HR) Director, which met three times during the year. Its role is to provide ongoing oversight of the delivery of the human rights strategy. The roles and responsibilities of the Steering Committee members are as follows:

- **Group Sustainability** – responsible for the overall delivery of the human rights workplan working with relevant business functions;
- **Group Procurement** – provides procurement expertise and insight to shape the workplan and assigns responsibility for implementing procurement aspects of the human rights approach;

- **Group Commercial** – provides commercial expertise and insight to shape the workplan and assigns responsibility for implementing aspects of the human rights approach relating to the appointment and management of subcontractors;

- **Group HR** – Facilitates alignment of human rights approach implementation with the People plan including diversity and inclusion priorities. Assigns responsibility for day-to-day cooperation between the sustainability team and Group HR to nominated members of Group HR.

The Human Rights Steering Committee approved our human rights strategy and workplan for the year and has been kept updated on progress on the identification, prioritisation and proposed prevention and mitigation of risks.

In addition, Group Construction is responsible for facilitating the delivery of human rights and modern slavery controls at a site level. Ongoing oversight of operational delivery is achieved through the Operations Group which meets monthly. Managing Directors are responsible for local supplier relationships and delivering modern slavery controls in their respective divisions.

4. Stakeholder engagement

We continue to engage widely across the Group as we develop and embed our policies and processes to address modern slavery.

In addition to regular internal engagement via the Human Rights Steering Committee, specific teams and individuals interact on a daily basis in their work to manage the risk of modern slavery, including Procurement, Commercial, and Safety Health and Environment (SHE).

We also engage externally in order to deepen our understanding of modern slavery risk in our industry, and to share good practice. We are a partner of the **Supply Chain Sustainability School** – an industry-led organisation for driving the improvement of sustainability knowledge and skills throughout the built environment sector.

We have been actively involved in its Solar Photovoltaic (PV) Group since 2023, including in the development and dissemination of a Solar PV Due Diligence Guidance launched in 2024. In addition, this year we participated in the Institute for Human Rights and Business Just Transition and Built Environment Accelerator. We attended the launch of the All-Party Parliamentary Group on a Just Transition in the Construction Industry, spearheaded by Baroness Young of Hornsey, and have provided input to her initial engagement across the industry. We have also presented updates to investors, banks and lenders throughout the year.

5. About our supply chain

Our direct supply chain includes contractors and agencies providing onsite labour, suppliers of products and materials used in housebuilding, and suppliers of products and materials for non-housebuilding purposes.

We have a centralised procurement team that procures 95% of our housebuild products and materials through 160 Group construction materials agreements². Our divisions locally source the remaining 5% of materials. 98% of our direct suppliers are located in the UK, and 2% are located in Europe.

We have a diverse subcontractor labour force (supporting over 6,000 companies across our divisions), the majority of trades being labourers, groundworkers and bricklayers.

None of our directly employed or contracted workers is involved in seasonal work.

Further information on our business and our supply chain management is available in our **2025 Annual Report and Accounts**.

6. Due diligence – identifying and managing our impacts

Identifying and managing modern slavery risk is a key element of our human rights due diligence framework. Our approach to due diligence is based on the OECD Due Diligence Guidance for Responsible Business Conduct, and the UN Guiding Principles on Business and Human Rights.

In 2023 we completed a human rights saliency assessment with the support of an external consultant to identify the most salient human rights issues for the business in order to aid prioritisation. The methodology was based on severity and likelihood of an impact occurring within our value chain. One of the salient issues identified for our business is modern slavery.

In 2024 our Human Rights Steering Committee approved our human rights strategy, framework and roadmap to 2027, which includes our plans for addressing modern slavery across the business.

During 2024/25 we carried out a screening of our goods and services supply chain for further due diligence, prioritising housebuild products and materials and onsite labour.

6.1 Housebuild products and materials supply chain

This year, we carried out a risk assessment of products and categories within our housebuilding products and materials supply chain, drawing on publicly available resources including publications by the International Labor Organisation (ILO), UNICEF, Design for Freedom, the Slavery and Trafficking Risk Template (STRT), the US Department of Labor Bureau of International Labor Affairs, University of Nottingham and other sources. We also used internal data sources, and data from an externally hosted Environmental, Social and Governance (ESG) screening platform.

The risk assessment enabled us to prioritise supply categories and suppliers as presenting a higher risk of modern slavery, for more detailed due diligence and mapping beyond tier 1. Priority supply categories for 2024/25 were solar PV, timber, electronics, bricks, sanitaryware, and waste management. Following this prioritisation, we sought further information about our suppliers in these categories via a self-assessment questionnaire (SAQ). 49 out of 51 suppliers that were contacted completed the SAQ, representing approximately 33% of total spend for Barratt Developments. We will extend this to additional supply categories in 2025/26 and across the combined Group.

6.1.1 Self-Assessment Questionnaire – Responses

The findings show clearly that while some of our suppliers are leading the way and demonstrating a commitment to transparency and due diligence in their supply chains, others are lacking the basic requirements for understanding and managing risk.

We are committed to working with our suppliers to support them in upholding their responsibility to respect human rights because this is more likely to result in positive outcomes for workers than simply ending a contract. This means understanding the barriers and challenges they face in conducting appropriate due

diligence, and assisting them where possible, in finding ways to overcome them. Through our supplier engagement programme, our aim in FY26 is to engage with our suppliers that source directly from higher-risk locations but do not yet have in place robust processes to identify and prevent adverse impacts.

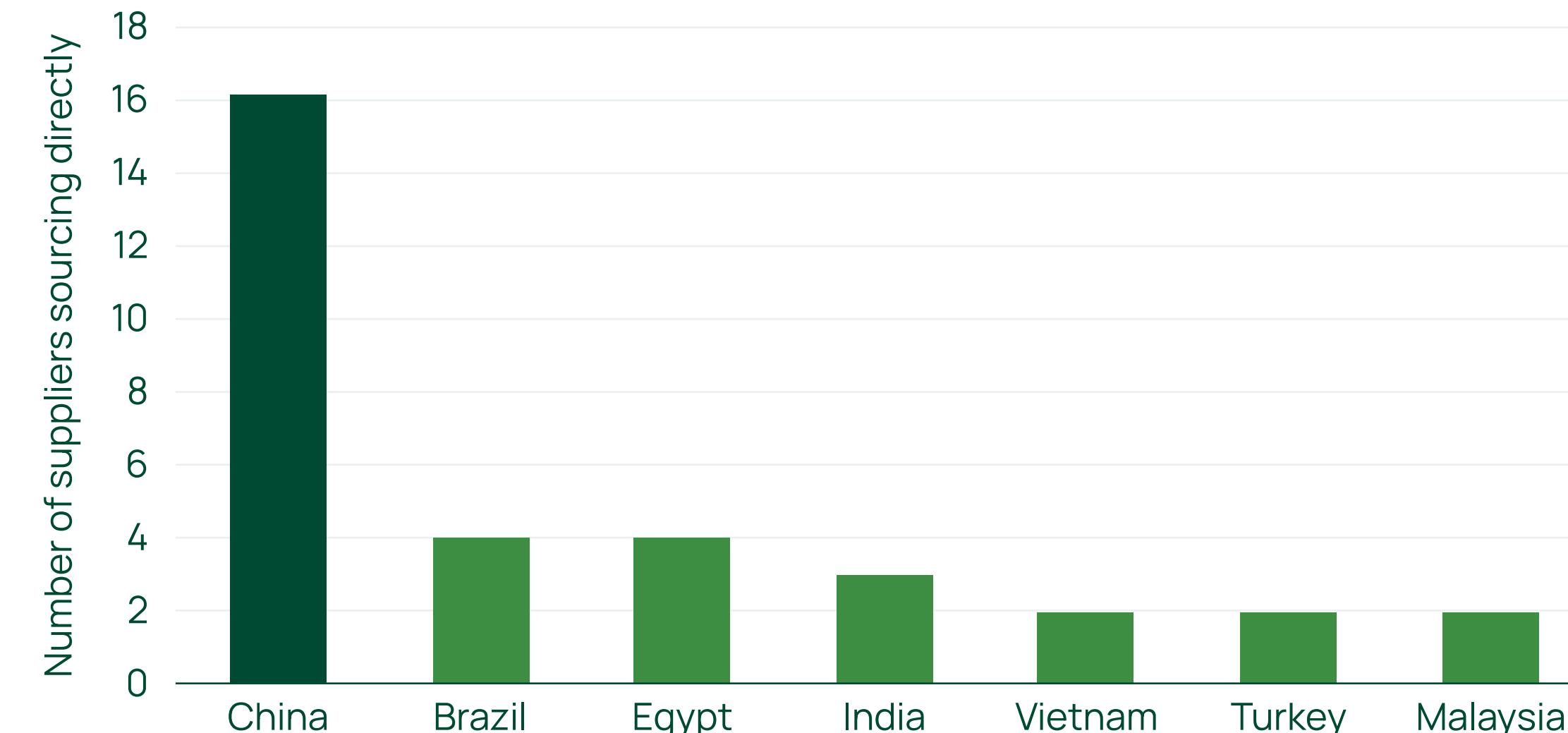
Of the 49 suppliers that completed the SAQ, 18 suppliers were found to be sourcing products, components and materials *directly* from a high-risk country (including China, Brazil, India, Egypt, Malaysia and Vietnam).

In addition, 18 suppliers were found to be sourcing products, components and materials *indirectly* from a high-risk country (including China, Brazil, and Indonesia).

However, while some suppliers have indicated that they source goods from higher-risk locations, others have indicated that they do not have visibility of their supply chain beyond their direct suppliers.

5 suppliers said they plan to start mapping their supply chain within the next 12 months. 18 suppliers did not know whether they were indirectly sourcing from a high risk location.

Higher-risk countries most commonly mentioned as directly sourced from



Questionnaire responses – sourcing information from the sample of tier 1 suppliers who completed the survey

In addition the following countries were mentioned as being directly sourced from: Albania, Armenia, Azerbaijan, Bahrain,

Bulgaria, Colombia, Georgia, Indonesia, Kazakhstan, Lebanon, Mexico, Mongolia, Morocco, Pakistan, Paraguay, Philippines, Qatar, Russia, Saudi Arabia, Singapore, South Africa, Sri Lanka, Thailand, Ukraine, UAE, Uzbekistan.

Note: A country was considered high risk if it appeared on any one of the Global Slavery Index, UNICEF Childrens' Rights and Business Atlas or the US Bureau of International Labor Affairs List of Goods Produced by Child Labor or Forced Labor.

6.1.2 Supplier onboarding

In addition to the work undertaken to assess risk across our existing housebuild products and materials supply chain, we have strengthened controls in the tendering and re-tendering process. All suppliers are required to complete a revised sustainability questionnaire as part of our invitation to tender process. During the year we strengthened the forced labour and modern slavery screening questions, and undertook an in-depth review of the human rights due diligence activities of applicants tendering for the provision of waste management services (see further information on waste management in section 6.2) and solar PV, industries that have been linked to forced labour.

Solar PV

Through our risk assessment we identified the solar PV supply category as presenting a higher risk of modern slavery. Negative human rights impacts have been widely documented in the solar PV industry, particularly in relation to sourcing from the Xinjiang region of China, where forced labour of the Uyghur population is reported to exist.

In 2024 we participated in the development of the Supply Chain Sustainability School's [Procurement Guidance Addressing Modern Slavery in Solar PV Supply Chains](#).

Solar PV will continue to be a priority category for further due diligence in 2025/26. Actions will include engagement with our direct suppliers, review of the tendering process in partnership with Procurement Category Managers and ongoing collaboration across the industry with peers and industry bodies.

Timber

We complete an annual survey of our timber suppliers. This provides us with data on the harvest locations and quantities of the timber we use in our housebuilding activities. 99% of the timber we use is Forestry Stewardship Council (FSC) or Programme for the Endorsement of Forest Certification (PEFC) certified³. PEFC and FSC certification schemes play a role in combating modern slavery by promoting responsible forestry practices and ensuring fair labour conditions within certified forests and their supply chains.

6.2 Onsite labour

We have a diverse subcontractor labour force supporting over 6,000 subcontractor companies across our 32 divisions, and we are committed to respecting the rights of all workers on our sites. All workers must present a valid competency card such as the Construction Skills Certificate Scheme (CSCS) card before being permitted onto a site. Anyone working on site must complete an online induction which includes information to support risk assessments including the need for an interpreter and contact details. The online induction is available in 8 languages and we are trialling additional questions that may indicate 'warning signs' for labour exploitation.

During 2024/25 we carried out an assessment of our onsite labour supply chain. As a first step, we reviewed company site induction records which provided insights into the profile of workers on our sites, helping us to understand where our greatest risks lie. Trades such as ground working, cleaning, dry lining, security, and landscape gardening are considered higher risk because these are lower paid and workers can be more vulnerable to exploitation than in other better paid and more highly skilled trades.





This year, we engaged the services of an independent labour risk management consultancy to undertake confidential interviews with workers to gain insights into their employment conditions, and to highlight potential risks in our, and our subcontractor processes, and areas for improvement. Sites were sampled on the basis of geographical risk and size. This exercise provided some useful insights into our onsite labour supply chain, particularly in relation to contractual arrangements, and checks of subcontractors, which we will seek to strengthen further during 2025/6.

All suppliers of agency/temporary labour staff working on Redrow sites are managed by a third party and required to complete a slavery and human trafficking questionnaire which is audited. The questionnaire asks suppliers to demonstrate their organisational processes and how they prevent modern slavery within their own supply chain. We are reviewing the option of rolling this out to all divisions within the Group.

Whilst not within our operations, we also recognise the modern slavery risks associated within the waste processing industries and so carry out spot checks on modern slavery controls as an addition to our Duty of Care reviews at our suppliers' waste processing facilities, some of which are outsourced.

6.3 Living wage

Barratt Redrow is a Living Wage Employer. We are committed to ensuring all those who work directly or indirectly providing labour on our sites or within our offices are paid the real living wage as defined by the Living Wage Foundation. Our standard terms and conditions mandate the payment of the living wage within our supply chain. For those working in jurisdictions other than the UK, our expectation included within our contract requirements is that local statutory minimum wages are paid, and suppliers completing the self-assessment questionnaire (see section 6.1) are required to confirm whether their supplier policies and codes specify payment of living wage and whether this is audited. Living wage checks as well as checks on the practice of charging recruitment fees are carried out within Redrow divisions through a third party (see section 6.2).

All our sites and offices exhibit posters advertising our commitment to the living wage and advising anyone working for us in any capacity of their right to payment in line with the living wage.

6.4 Grievance mechanisms

We have a confidential whistleblowing hotline accessible to all employees, subcontractors and suppliers, both past and present, who become aware of possible improper, unethical or illegal behaviour. Workers are encouraged to raise any matter of concern with their manager, the Group Head of Legal or other assigned point of contact or alternatively use the confidential whistleblowing service (Safecall: 0800 915 1571 or barratt@safecall.co.uk), available 24 hours a day, seven days a week and supported by interpreters who are available to offer their services in 175 different languages. Our whistleblowing policy was updated in 2024/25 to include more specific reference to modern slavery. Site posters signpost workers who may be at risk of exploitation to sources of support – this is available in 9 different languages, and was recently rolled out to Redrow sites.

This year one potential case of forced labour was raised by a Barratt Redrow employee directly to an HR Business Partner, following concerns for the welfare of a site employee, however upon further investigation no evidence of forced labour was found.

7. Training

7.1 Internal training

Our human rights e-learning is mandatory for all Directors and Heads of Function, and specific roles within Group and Divisional teams. This training was updated and relaunched last year to target a wider audience and to cover the definitions of modern slavery, why it matters to the Group, and how to spot the signs and report concerns. The training also promotes understanding of roles and responsibilities in relation to modern slavery and labour exploitation. Content is tailored to the Procurement, HR, Commercial and Construction function groups.

As we implement our human rights strategy and framework, we engage across the business on modern slavery, and enable teams to manage modern slavery risks in their day-to-day work.

7.2 Supplier training

Through our partnership with the Supply Chain Sustainability School, we have collaborated with other representatives from the construction industry to develop learning materials for the industry's supply chain. Across our own supply chain, we have mandated and successfully signed up 150 of our centrally procured construction materials suppliers as members of the School so that they can access these training materials. We receive monthly reports on progress: 122 of these have achieved the highest attainment level on the Supply Chain School sustainability matrix in relation to modern slavery. We are reviewing how we enrol sub-contractors to engage with the School as part of the wider human rights programme, and to date 16% of our top 500 sub-contractors by spend are active members of the School.

8. Additional policies:

The following Group policies support our commitment to eliminate Modern Slavery and Human Trafficking:

- Health and Safety
- Ethics
- Sustainable Procurement
- Human Rights Approach

9. Monitoring and evaluation

Much of the work we have completed in 2024/25 has focused on setting a baseline against which we will measure and evaluate our own performance and that of our suppliers in the coming years. For example, we have begun to record the supply chain mapping and due diligence activity among housebuild products and materials suppliers against which we will be able to measure the success of our ongoing supplier engagement work. During 2025/26 our aim is to refine our KPIs further.

Our roadmap to 2027 includes milestones and targets for our business, and through our ongoing supplier engagement programme we will set objectives with suppliers.

Key performance indicators

Area of activity	Indicator	2023/24	2024/25
Training	The number of Modern Slavery e-learning module completions for roles for which mandatory*.	459 out of 481	3,112/3,350 [92%]

* All Divisional Construction and Commercial, Group SHE, HR, Procurement, Commercial, Internal Audit roles and selected IT, Wilson Bowden Developments and Oregon roles.

Approval and sign off

This Modern Slavery Statement has been developed in consultation with the Human Rights Steering Committee and with internal functions including Group Procurement, Group Commercial, and Group Sustainability, and has been reviewed by all relevant function heads. It is made pursuant to section 54 of the Modern Slavery Act, and was approved by the Board of Barratt Redrow PLC and is signed on its behalf by:

David Thomas



Chief Executive and Board Member

4th November 2025

Appendix

Companies and entities within the Barratt Redrow PLC organisational structure, on whose behalf this statement is made and which form part of the Barratt Redrow PLC business or supply chain:

- BDW Trading Limited
- Redrow Homes Limited
- Oregon Timber Frame Limited
- Oregon Timber Frame (England) Limited
- Gladman Developments Limited
- Barratt Metropolitan LLP
- Wembley Park Properties LLP
- Wichelstowe LLP
- Infinity Park Derby LLP
- David Wilson Homes Limited
- Wilson Bowden Developments Limited
- Harrow View LLP
- Brooklands Milton Keynes LLP





Barratt Redrow Modern Slavery Statement 2025