

## **Anti-Slavery, Human Trafficking and Human Rights Policy**

### **Introduction**

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Taylor Wimpey plc (and its subsidiary companies, hereinafter 'Taylor Wimpey') strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain and respecting human rights more generally is a fundamental part of our ethos and values as an organisation. We are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or, as far as we are able to do so, in any of our supply chains and to ensure that wider human rights are similarly respected. We therefore expect that our suppliers will hold themselves and their own suppliers (including, without limitation, sub-contractors, material suppliers and labour providers) to the same high standards.

Taylor Wimpey has a responsibility to respect the human rights of our employees and we will endeavour to respect the human rights of all other persons working for us or on our behalf (including contractors, agency workers, business partners, suppliers and workers in our supply chains) and of our customers and other stakeholders. We both expect and require all of our employees to engage with us to support the human rights of others and commit to the continuous improvement of our human rights performance.

When we refer in this policy to 'modern slavery' we intend to encompass the much wider abuses of human rights (as outlined in the European Convention on Human Rights).

### **Policy Statement**

We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to gaining a clearer understanding of; how modern slavery operates in different contexts, who is affected and how, and the risk of modern slavery existing within our industry.
- We are committed to having a clear and transparent company statement, which is reviewed regularly and communicated to our employees and posted on our website, which sets out the steps taken to prevent modern slavery and the effectiveness of those measures.
- We are committed to training relevant employees in modern slavery, how to

identify it in practice and how to respond. We are committed to ensuring that our employees adhere to this policy and understand that non-compliance with it is a disciplinary offence.

- We are committed to engaging with our industry, stakeholders and suppliers in order to address the risk of modern slavery in our operations and supply chain.
- As part of our contracting processes, we will include a specific prohibition against the use of modern slavery and trafficked labour and a requirement for suppliers to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery.
- Our employment and recruitment agencies and other third parties supplying workers to our organisation are required to comply with our Code of Conduct. Suppliers engaging workers through a third party are also required to obtain third parties' agreement to adhere to the Code.
- We are committed to auditing suppliers, based on risk, for their compliance with our Supplier Code of Conduct. We aim to work with suppliers to remediate incidents of non-compliance and may terminate the relationship in response to gross, persistent or deliberate failures.

## **Policy Application**

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time. Workers must ensure that they read, understand and comply with this policy.

## **Responsibility for the policy**

The Taylor Wimpey plc Board of Directors has approved this policy and is committed to making available sufficient resources for its implementation and has overall responsibility for ensuring compliance.

The Group General Counsel and Company Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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 and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Group General Counsel and Company Secretary.

## Reporting Modern Slavery

Individuals must notify their manager, or another person of appropriate seniority within Taylor Wimpey, as soon as possible if they have any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy. Individuals can also refer to the Whistleblowing Policy for guidance on reporting concerns and use our confidential external whistleblowing hotline and website (Safecall: 0800 9151571 or safecall.co.uk), colleagues in Spain may also contact Safecall via the aforementioned telephone number.

If a suspected incident of modern slavery is reported to you, please refer this immediately to the Group General Counsel and Company Secretary who will ensure that the event is fully investigated and the appropriate action is taken.

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 their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Department immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the TW Grievance Procedure.

## Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We take all aspects of Modern Slavery very seriously and we therefore reserve the right to terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

The Board of Taylor Wimpey plc will monitor the effectiveness of this Policy and will review the Policy on a regular basis and at least every two years.

Approved by



CEO, Taylor Wimpey  
plc

Date: Feb 2024