

CODE OF CONDUCT

JUNE 2024



DEVELOPING THRIVING
COMMUNITIES BY VALUING PEOPLE
AND BUILDING RESPONSIBLY



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1 Introduction from the Group Chief Executive

Dear Colleague,

Welcome to Redrow's Code of Conduct (the "Code"). The Code acts as a guide to doing the right thing in business and should assist you with:

- 1 Protecting the Redrow brand and upholding our values;**
- 2 Acting in a way which is considered honest and ethical;**
- 3 Understanding what Redrow expects from you;**
- 4 Making good business decisions; and**
- 5 Seeking guidance from the correct places should you have any questions.**

Redrow has the right strategy and vision to thrive in the housebuilding industry however, each employee is equally important in ensuring that we successfully execute this strategy. It is therefore of huge importance that compliance with this Code is undertaken by each and every one of us, in both letter and spirit.

The Code focuses on the values and behaviours deemed most important to Redrow. If you are ever faced with difficult choices during your employment, we hope that this Code will guide you in your good judgement to act in the Redrow way. If you are ever unsure of what is the right answer, please always ask – there are a number of support channels, which are outlined in this Code.

If there is any suspicion of wrongdoing within Redrow, please speak up. Redrow takes all concerns seriously and any allegations will be treated in strict confidence.

Redrow takes pride in the quality we are able to deliver and we rely on our people to sustain our reputation in the industry. I hope that you will be guided by the expectations of this Code and embrace it's messaging by upholding the Redrow values in your daily work.

Matthew Pratt
Group Chief Executive

2 The Redrow Brand

Purpose, Vision & Values

Our brand purpose is central to everything we do: everyone at Redrow, across all levels, locations and functions has a clear sense of purpose and how they contribute to the team effort which underpins our continued success.

Our purpose is to give people a **better way to live**. Every day, we aim to build homes that are better by design, create better places and provide better experiences. Homes are far more than the immediate four walls. At Redrow, we believe local neighbourhoods, surrounding ecosystems and the wider environment are all part of 'home'.

We create **Thriving Communities**, by **Building Responsibly** and **Valuing People**. These sustainable business themes are at the core of everything we do. They are the very foundations of Redrow developments and help us to lead the way, ahead of industry norms and legislation, in setting exacting standards.

To ensure we are each contributing to the overall strategy, everything we do should connect back to one of our three key sustainable business themes of: Developing Thriving Communities, Building Responsibly and Valuing People. Under each theme, there are key strands reflecting the behaviours required in support of the sustainable business themes.



2 The Redrow Brand

Culture

At Redrow, we are **confident** about our established brand and our **innovative** way of transforming lives of our customers, we create dream **aspirational** homes with **inspirational** designs and we focus on creating **personal** emotional connections with our customers that will make them feel instantly at home.

The Redrow culture is embedded through our values therefore it is important to understand individually how we apply these in our daily working life. The Redrow culture is the unconscious landscape through which our people think, behave and act, regardless of whether you working in the boardroom, Division, Group or on site. To succeed, we require each individual employee to embrace and live the Redrow culture.

Stakeholders

Our key stakeholders are impacted by everything we do therefore due consideration must be given to them in carrying out our roles. To do that, we must understand who they are and what their priorities are.

To view our current stakeholders, find details of their key priorities, including how we have incorporated their responses into our business decisions and strategy, please see the Stakeholder Engagement section of the latest Group Annual Report.

Brand Portal

All colleagues have access to the Redrow Brand Portal where further details of the Redrow brand, brand principles, media and guidelines can easily be accessed.

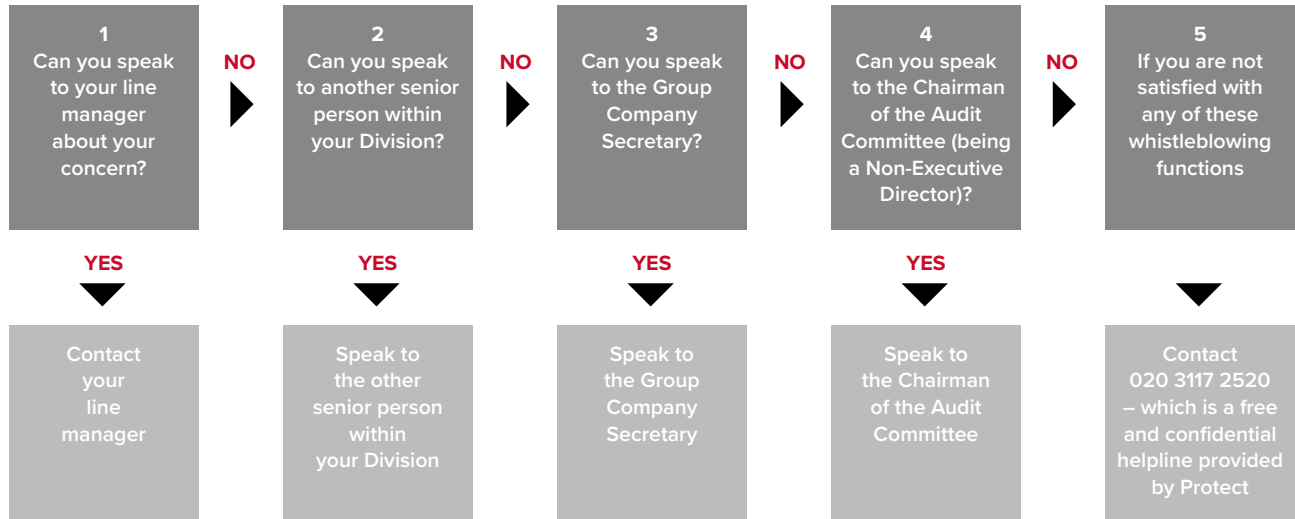
Key Contacts

Matt GraysonGroup Customer & Marketing Director **01244 520044****Brand Team****brand@redrow.co.uk**

3 Whistleblowing

Every employee has a responsibility to speak up if you see something that is not right. Redrow has in place a Whistleblowing Policy that can be found on Engage.

If you are concerned about any form of possible malpractice (whether it is unethical, unsafe or otherwise), we urge you to raise this concern in line with below:



Redrow is committed to:

- 1 Anonymity** – a matter can be raised in strict confidence and your name will never be disclosed without your prior agreement.
- 2 Non-retaliation** – Redrow has a strict zero tolerance approach to retaliation of any kind to a person who has raised a concern in good faith. Any instance of retaliation should be reported in the same method.
- 3 Safeguarding** – those who raise concerns in good faith will be protected, even if it turns out to have no basis after investigation.

Key Contacts	
Beth Ford Group Company Secretary	01244 520044
Protect (Independent Whistleblowing Advice Line)	020 3117 2520



4 Health, Safety and Environment (HS&E)

Redrow is committed to quality and excellence therefore it follows that minimising risk to people, plant, products and the environment is inseparable from all of its other objectives. Good HS&E performance has naturally become embedded into the Redrow culture, as it forms part of the overall duty of being an employee or supplier.

We seek to achieve the highest health, safety and environmental standards as it significantly contributes to the overall performance of the business and protects both people and environment from harm. Redrow operates an environmental management system that ensures that it manages environmental impacts in a systematic way and is certified by the British Standards Institute to the international standard ISO 14001:2015.

Redrow is committed to:

- 1** Ensuring the health, safety and welfare of our employees, contractors, visitors, customers and members of the public;
- 2** Protecting the environment and preventing pollution;
- 3** Ensuring that decisions about other priorities take suitable and sufficient account of HS&E requirements; and
- 4** Continual improvement in both our HS&E standards and performance.

Redrow expects all its employees to be seen as ambassadors of good HS&E and to provide constructive improvement proposals and feedback whenever they find or observe practices that do not meet the required standards. Employees should familiarise themselves with the Health, Safety and Environmental Policy, available on Engage.

Finally, everyone has the right to cease work if they believe it is unsafe, can potentially affect their health or adversely impact on the environment. If you witness any behaviour which is inconsistent with our Health, Safety and Environmental Policy, you should report it immediately to your line manager or through the procedure outlined in the Whistleblowing Policy.

Key Contacts
Darren Shattock Group Health Safety & Environmental Director 01244 520044

5 Equality, Diversity & Inclusion

Redrow recognises that our continued success depends upon our ability to recruit the right people, retain them and develop them to reach their potential. Attracting a diverse range of skills and abilities will enable us to meet the challenge of the growing skills gap in the sector.

Diversity is a celebration of all of the characteristics which make us different and individual. Redrow is firmly committed to giving every potential recruit and employee the same opportunities irrespective of their gender, race, ethnic or national origin, disability, age, sexuality, religious belief, marital status or social class.

There is a strong commitment to continuously promoting equality, diversity and inclusion (“ED&I”) throughout the business to build a culture that is inclusive to all, actively values difference and ensures everyone is treated fairly. There is a culture where ED&I is championed by leadership and everyone in the Company owns it, feels empowered and is confident enough to get involved.

How does a diverse and inclusive workforce benefit Redrow?

- As a national housebuilder, we will gain a better understanding of our customers if our workforce represents a wide demographic.
- Cognitively diverse teams solve problems faster as pressure to conform is reduced and helps to avoid “groupthink”.
- Creativity and productivity is increased as people with different skills and backgrounds are involved in decision-making.
- It makes us more culturally aware which is beneficial for our work and personal lives.

How can I help drive a diverse and inclusive culture?

- Educate yourself in different cultures;
- Be respectful of cultural differences;
- Be aware of any implicit or unconscious bias;
- Speak up if you see any form of prejudice or discrimination going on around you; and
- Ensure merit is the basis for your decisions.

5 Diversity & Inclusion

What is “unconscious bias”?

Each person holds unconscious beliefs on a whole variety of matters. Unconscious biases are stereotypes of a person with a certain characteristic that make us unfairly prejudice for or against them. They will often conflict with your conscious values and may be more prevalent in a stress situation.

The two key elements to limiting the impact of unconscious bias within Redrow are:

- i **Self-awareness** – No matter how unbiased we think we are, there may be unconscious negative opinions around certain groups. Be honest with yourself about the stereotypes that affect you.
- ii **Action** – Surround yourself with people from other groups as this will challenge your unconscious bias and reduce its ability to influence your thoughts and decision-making.

Redrow operates a zero tolerance approach to any form of unlawful or unjust discrimination. The Equality, Diversity and Inclusion Policy is the framework for our commitment to our people in this regard and any behaviour which is inconsistent with this Policy will be treated as employee misconduct and appropriate action will be taken.

Key Contacts	
Karen Jones HR Director	01244 520044
Martin Gilpin Head of HR	01244 520044

6 Human Rights

At Redrow, we value and appreciate the contribution made by all employees at every level and we have a commitment to protecting and respecting human rights. Valuing People is a key component of our strategy and we strive to go above and beyond compliance with human rights.

Redrow is committed to:

- Respecting human rights;
- Respecting employee rights;
- Adopting measures to ensure the workplace is free from discrimination;
- Respecting employee rights;
- Ensuring lawful and fair working hours and reward structure;
- Adopting a zero tolerance approach to of any form of harassment, bullying, child labour, forced labour or human trafficking;
- Providing a friendly and safe workplace;
- Protecting physical and mental wellbeing;
- Partnering with supply chain partners with high ethical business standards;
- Ensuring that our practices conform at all times with the UN Universal Declaration of Human Rights;
- Maintaining accreditation with the Living Wage Foundation by ensuring that the pay of every Redrow employee is aligned with the real living hourly wage and extending this to the supply chain as a condition to working with the Company; and
- Regularly engaging with employees.

The Human Rights Policy Statement is the framework for our commitment to our people in this regard and covers each of the above topics.

Should you become aware of any possible human rights infringement, or behaviour that is inconsistent with our Human Rights Policy you should report it immediately to your line manager or through the procedure outlined in the Whistleblowing Policy. This is the case whether you believe the infringement is within Redrow or within our supply chain.

Key Contacts	
Karen Jones HR Director	01244 520044
Beth Ford Group Company Secretary	01244 520044

7 Supply chain and modern slavery

Redrow conducts its operations with respect to the interests and human rights of those employed in its supply chain.

Redrow is committed to:

- 1** Working collaboratively with our supply chain to develop relationships based on honesty, openness, respect and fairness.
- 2** As a partner of the Supply Chain School, supporting our supply chain by, among other things, improving their knowledge of sustainability through training and working with subcontractors to attract new entrants into the industry and supporting their training needs.
- 3** Carrying out due diligence on our supply chains to ensure that the values of the partners which we are working with are aligned with the Group's commitments to high ethical business standards.
- 4** Implementing and enforcing effective systems and controls to ensure that there is no modern slavery or human trafficking in any part of our business or supply chains, including the undertaking of regular audits of the labour supply chain to prevent non-compliance and potential illegal working practices.
- 5** Acting ethically and with integrity in all business relationships.

Redrow embeds these commitments and expectations through its policy, Partnering with our Supply Chain. For further details on the steps taken by Redrow to ensure that modern slavery is not taking place in our business or supply chains, please see our Slavery and Human Trafficking Statement.

Should you become aware of any possible instance of slavery, human trafficking or unethical practices which sit outside of our values and policies, either within Redrow or our supply chain, you should report it immediately to your line manager or through the procedure outlined in the Whistleblowing Policy.

Key Contacts	
Stuart Hill Group Commercial Director	01244 520044
Beth Ford Group Company Secretary	01244 520044

8 Integrity

8.i) Bribery

Redrow has a zero tolerance approach to bribery or corruption of any sort and there is a formal Bribery and Corruption Policy in place dealing with this, which can be found on Engage.

In order to ensure there is no conduct which could be perceived as bribery, we are reliant on our employees acting in the right way and understanding what could constitute a bribe or corruption.

A bribe is not necessary just an offer of money – a bribe is a direct or indirect action where a person promises, or gives a financial or other advantage, designed to induce any party to perform a function improperly, or rewarding such improper performance.

Employees and Redrow may be guilty of an offence if they directly or indirectly bribe another person or are in receipt of a bribe from another person. If found guilty, an employee could face a term of imprisonment up to 10 years and/or an unlimited fine.

Decision-making tool

How do I know if my situation could constitute bribery or corruption?

- 1 Does the action in this situation conflict with Redrow's values?
- 2 Is the action illegal?
- 3 Would my colleagues/manager/HR Director/Group Legal think my action was illegal?
- 4 Would I feel compromised having to inform someone else over what I had done?
- 5 If my action was reported in the media, would I/Redrow feel ashamed?
- 6 If faced with having to discuss the action in a court of law, would I feel in the wrong?

If any of these answers are yes, or you would feel ashamed of your actions, you should stop your involvement and inform the Company using the whistleblowing procedure.

8 Integrity

Redrow’s six principles for Bribery Prevention:

- 1 Maintenance of bribery risk assessments within our sector;
- 2 Top level commitment of the unacceptability of bribery which is engrained in our culture;
- 3 Proper due diligence with people we do business with and seeking reciprocal anti-bribery agreements;
- 4 Clear policies and procedures applicable to all employees and business partners;
- 5 Effective implementation by embedding anti-bribery within internal controls, recruitment, remuneration policies, operations, communications and training; and
- 6 Monitoring and reviewing through auditing and financial controls which are sensitive to bribery.

Bribery in any form shall be treated as serious misconduct and will be dealt with accordingly.

Key Contacts	
Beth Ford Group Company Secretary	01244 520044

8 Integrity

8.ii) Gifts & Hospitality

Redrow prides itself on being a business with integrity. We believe that gifting and receiving gifts and hospitality can, if in line with our Receipt of Gifts and Hospitality Policy (which can be found on Engage), build good working relationships and goodwill. However, anything deemed excessive, without legitimate purpose or lacking transparency is unacceptable.

	Definitions
Gift	An item, cash, goods or service offered for personal benefit
Hospitality	A generous or material welcome or reception that is more than an incidental kind (such as a beverage or light refreshment) and outside the normal business as usual.

Decision-making tool

Should I accept/offer the gift/hospitality?

- 1 Could my acceptance/offer lead to a claim of “undue influence” being made or imply such a position if accepted?
- 2 Is this gift/hospitality in reality a ‘sweetener’ to retain business, or could it be claimed to be such?
- 3 Is this gift/hospitality an excessive, inappropriate or secret ‘reward’ for a business transaction?
- 4 Is this gift/hospitality excessive in value?
- 5 Could I breach any applicable laws, regulations or company policy by acquiring it?

If any of these answers are yes, the gift/hospitality should not be accepted/offered and you should inform the Company using the whistleblowing procedure.



8 Integrity

Trade or discount cards (which have not been negotiated by Redrow on behalf of all employees) or free or subsidised materials or work from business connections must be rejected.

Authority

Before accepting a gift/hospitality that has a legitimate purpose, an assessment must be made as to the value of such an offering.

Any gift or hospitality exceeding £50 in value must be approved in line with the Receipt of Gifts and Hospitality Policy, using the Gift Register Authorisation Form, which can be found on Engage. The level of authorisation required is determined by a) the employee category; and b) the value of the gift/hospitality. Depending on the value of the gift, the relevant approver(s) may range from your Head of Department to a Main Board director.

Record keeping

It is vital that we maintain an accurate record of all gift register authorisation forms received, whether approved or declined. Employees must forward the original form to the Divisional Managing Director/Regional Director, or Group Company Secretary in Group.

Any employee subsequently found to have accepted/given a gift or hospitality without approval will be treated as having committed an act of gross misconduct.

Key Contacts	
Beth Ford Group Company Secretary	01244 520044

8 Integrity

8.iii) Tax evasion facilitation

Redrow has a zero tolerance approach to the facilitation of tax evasion and our policy is to conduct all matters of business in an ethical manner. There is a formal Anti-Facilitation of Tax Evasion Policy in place dealing with this, which can be found on Engage, and we expect all associated persons of Redrow (including employees, directors or anyone working on our behalf in any capacity, such as subcontractors and business partners) to act in accordance with this policy.

Under the Act, a criminal offence is automatically committed by a corporate entity where an employee (or person otherwise acting on behalf of Redrow), deliberately and dishonestly facilitates tax evasion. A deliberate failure to report suspicious activity, or ‘turning a blind eye’ could amount to the criminal offence.

What is tax evasion? Tax evasion is the criminal offence of cheating the public out of revenue or being knowingly concerned in the fraudulent evasion of tax.

What is tax evasion facilitation? Tax evasion facilitation is the criminal offence of being knowingly concerned in the fraudulent tax evasion by another person; aiding or abetting tax evasion; or being involved in the commission of an offence consisting of being knowingly concerned in, or in taking steps with a view to, the fraudulent tax evasion.

What should I be looking out for? Within the Policy, there is a non-exhaustive list of possible warning signs that may arise during the course of you working for Redrow which could potentially raise concerns related to tax evasion. You should familiarise yourself with these warning signs and ensure you adopt a common sense approach in order to remain vigilant.

Redrow expects that all employees will act both honestly and with integrity to protect its reputation. As an employee you have a responsibility for tax evasion prevention and detection. If any action is believed to in any way evading tax, you should report such suspicions to management. If you are unsure about whether a particular act constitutes tax evasion, you must raise it with the Group Company Secretary as soon as possible.

Each instance of tax evasion, or its facilitation, will be investigated and dealt with as appropriate. No employee will suffer any consequences of reporting any suspicions.

How to report? If you encounter any warning signs which may lead you to suspect any wrong doing which could potentially lead to another person evading tax, you should report this promptly. You may do so through the whistleblowing procedure, a summary of which can be found on page 5 of this Code.

How will it be treated? The act of tax evasion facilitation will be considered as serious misconduct and be dealt with as described in the Redrow Employee Handbook. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Key Contacts

Beth Ford

Group Company Secretary

01244 520044

8 Integrity

8.iv) Conflicts of interest

Transparency in our business dealings is paramount and we must ensure that we are managing conflicts of interest, or potential conflicts, effectively. To do this, we must avoid situations where our personal interests may conflict with the interests of Redrow.

What is a conflict of interest? Generally, this is where your position within Redrow presents an opportunity for you, or someone close to you, to obtain a personal gain beyond your usual employment rewards, or where you may prefer your personal interests, or of someone close to you, beyond your responsibilities to Redrow.

Disclosing a conflict of interest – you must inform your line manager if there is any possibility of there being an actual or potential conflict of interest before you proceed in any way. It may be possible for conflicts to be managed, by taking steps to remove the conflict or reduce it to an acceptable level, provided the interests of Redrow are always appropriately maintained.

A Divisional board meeting must be held to discuss any actual or potential conflicts. If authorised, it must be recorded how the conflict has been mitigated, and if not authorised, what action has been taken to ensure that it does not become an actual conflict. It is then the responsibility of the Divisional Managing Director/Regional Director to inform the Group Company Secretary, so that this can be recorded and reported to the Board.

Directors must disclose any actual or potential conflicts of interests immediately to the Group Company Secretary and seek formal approval from the Board.

If you are unsure whether you have a potential conflict, you should contact the Group Company Secretary to discuss your situation.

Annual declaration – each Head of Department must make an annual Related Party Transaction Disclosure confirming any instances where employees had an actual or potential conflict of interest therefore it is very important that you discuss any potential conflicts as early as possible with your line managers.

Examples of situations which could lead to conflicts of interests – this list is non-exhaustive but is intended to provide an indication of the types of situations which could be an actual or potential conflict of interest:

- 1 A close relative working, or having a material financial interest, in a competitor, supplier, customer or other business which Redrow has significant dealings.
- 2 Having the ability to hire or affect employment terms and conditions of close relatives.
- 3 Having a material financial interest in a competitor, supplier or other business which Redrow has significant dealings.
- 4 Having outside employment with a third party without first receiving approval from Redrow.
- 5 Using information gained from employment for gain, either personally or by a close relative.

Key Contacts

Beth Ford

Group Company Secretary

01244 520044

8 Integrity

8.v) Share dealing – insider dealing

Redrow is committed to supporting a fair and transparent securities market and has a strict policy that must be adhered to by all employees.

The Share Dealing Code, which can be found on Engage, sets the rules intended to ensure that employees do not misuse information held about the Company that is not available to other investors.

Decision-making tool

How do I know if I have Inside Information?

- 1 Is the information precise?
- 2 Does it relate, directly or indirectly, to the Company or its shares?
- 3 Would it likely have a significant effect on the Company's share price if made public (i.e. "would a reasonable investor likely use the information as part of a basis for investment decisions?")
- 4 Is the information outside of the public domain?

If the answer to each of these questions is yes, you should not deal and you should inform the Group Company Secretary if you have not been made aware that you are on an Insider List.

What to do if you have access to Inside Information?

If you have access to inside information, you will be added to an Insider List and notified of the restrictions and obligations of being on such a list.

Whilst in possession of the information, you must not:

- Use it to deal in the Company shares (known as 'insider dealing');
- Recommend or induce somebody to engage in insider trading; or
- Disclose the information to anyone else except where you are required to do so by law or as part of your employment.

'Dealing' is widely defined. It would include, but is not limited to, buying and selling shares; exercising options under Company share plans; transferring shares to your spouse; and gifting or receiving a gift of shares.

If you are a Restricted Employee, PDMR or Insider (as defined in the Company Share Dealing Code) you must obtain authorisation to deal in Company shares prior to doing so.

If you have any queries around your status or around dealing in the Company's shares more generally, please contact the Group Company Secretary.

Key Contacts

Beth Ford
Group Company Secretary **01244 520044**



8 Integrity

8.vi) Data and Asset Protection

Protecting Data

The protection of personal data within Redrow is paramount and we have in place a number of policies and procedures to ensure that that protection is upheld wherever possible. All Redrow employees must ensure they have familiarised themselves with the following key documents in relation to the General Data Protection Regulations (“GDPR”), which are available on Engage:

- Data Protection Policy
- Data Protection Impact Assessment Policy
- Cyber Security Assurance Policy
- Data Retention Policy
- IT Security Policy
- Legal Rights (Personal Data) Policy
- Data Protection Guidelines
- Privacy Notice

What are my data protection responsibilities as an employee of Redrow?

As an employee of Redrow, we expect you to:

- 1 Contact the Data Protection Officer (“DPO”)** – in any of the circumstance outlined below, or if you are unclear of any of the GDPR requirements applicable to you.
- 2 Training** – attend and complete the GDPR-related training courses on Your Learning, including upon first employment and refresher training if your role involves handling personal data even in the broadest sense.
- 3 Impact assessments** – undertake a Data Protection Impact Assessment (in the form available on Engage) wherever a new business process or technology is introduced to ensure an assessment has been made of how it may impact the rights of individuals, what risks there may be, and work to minimise them.
- 4 Internal data sharing** – only share personal data internally within Redrow or our agents where the recipient has a job role whereby they need to know the information.
- 5 Third party data sharing** – before sharing personal data with any third party, follow our Cyber Security Assurance Policy, which covers the contract (to be signed by Legal), their IT security measures and the transmission of data.
- 6 Lawful basis** – ensure that there is a lawful basis for the processing of any personal data, which is in accordance with the seven principles (outlined in the Data Protection Guidelines).
- 7 Retention period** – ensure that personal data is retained for the period outlined within the Data Retention Guidelines and that the agreed destruction methods are followed following cessation of the retention period.
- 8 Exercise of GDPR right requests** – forward all verbal or written requests by individuals to exercise any of their rights under GDPR immediately, without any delay, to the DPO.
- 9 Security breach** – forward whatever details you have without delay to the DPO if you become aware of an actual or potential data security breach.

8 Integrity

When must I contact the DPO?

The DPO must be contacted immediately if any of the following circumstances exist:

- 1 If you are unsure of the lawful basis to rely on to process personal data;
- 2 If you are collecting a new category of personal data;
- 3 If you need to rely on and obtain evidence of consent;
- 4 If you are unsure of the retention period for some personal data;
- 5 If you are unsure of, or believe to be inadequate, any security measure relating to personal data;
- 6 If there has been an actual or potential loss of personal data (a breach);
- 7 If you have received a Subject Access Request or an individual has exercised any of their other rights under the GDPR;
- 8 If you are considering or implementing a new business process or use of technology that involves processing personal data;
- 9 If you are considering profiling or using automated decision making; and/or
- 10 If you intend to pass personal data to any third party where there is not a GDPR compliant contract already in place.

If you have any concerns regarding the privacy or use or security of personal data, you may raise them, without fear of retribution or detriment, with your manager. If you feel that is inappropriate, or you are not satisfied with their response, you may address your concerns directly to your Managing Director, Group Head of Department or the DPO.

8 Integrity

Protecting Assets

Good security practise by all Redrow employees in all dealings with systems, email, the web, PCs and mobile devices is essential to maintain the integrity of our data, our systems and our commercial viability.

What are my asset protection responsibilities as an employee of Redrow?

As an employee of Redrow, we expect you to:

- 1 Adhere to the controls set in place for keeping equipment safe and secure, including in line with the IT Security Policy.
- 2 Not take any steps to disable or circumvent any security measures put in place by Redrow.
- 3 Adhere to the Email and Internet Use Policy, with personal use being permitted only if reasonable, responsible and not excessive.
- 4 Whether travelling, on site or at Head Office or a Divisional Office, follow the advice below for keeping assets safe.
- 5 Protect your account by making sure that your user IDs and passwords are secure.
- 6 Be vigilant against cyber-attacks and scams, such as phishing attempts, and report any instances of this either within outlook as spam and/or directly to the Cyber Security Awareness team.
- 7 Guard the intellectual property of Redrow and respect the intellectual property rights of others.
- 8 Organise the storage of your documents on the Redrow network.
- 9 Report any loss or damage to any computer equipment to your manager and the IT Help Desk immediately.

Advice relating to storage of PCs, tablets and other mobile devices, including USB sticks		
<p>Travelling</p> <p>Must be locked in the boot if it has to be left in a car during the day.</p> <p>Must not be left overnight in a car.</p> <p>If staying overnight in a hotel, the equipment should be left in your room, in a safe if possible.</p>	<p>Site Office</p> <p>Must not be left overnight in Site Offices.</p> <p>Must be locked away when staff are out of the office.</p> <p>Must be taken home overnight.</p>	<p>Head Office or Divisional Office</p> <p>Must be locked away securely overnight (not left on a desktop, nor in a docking station even if locked).</p> <p>Preferably secured with a Kensington lock during the day.</p>

Key Contacts	
Beth Ford Group Company Secretary	01244 520044
Glyn Morriss Chief Information Officer	01244 520044
Data Protection Team/DPO	GDPR@redrow.co.uk 01244 520044

8 Integrity

8.vii) Competition Compliance

Redrow has a zero-tolerance approach to anti-competitive practices. The purpose of competition law is to ensure that there is effective competition to improve consumer welfare. Fair competition equates to higher quality products, greater output, more innovation and fair pricing.

Note that all agreements between undertakings, decisions by associations and concerted practices which may affect trade within the UK, and which have as their object or effect the prevention, restriction or distortion of competition within the internal market are prohibited.

Concert practices are also prohibited, which may consist of direct or indirect contact between competitors whereby the object or effect of this contact is to influence the conduct on the market of a competitor.

The following is strictly prohibited by Redrow and shall be treated as serious misconduct:

- a) Sharing of commercially or competitively sensitive information being shared with competitors; or
- b) Entering into agreements, which may be written, oral, signed or unsigned, of any sort with competitors which would impact the competition in the market (for example, an agreement not to lower prices or not to approach each other's customers or an agreement to share commercially sensitive information).

Note that unilateral provision or receipt of information to or from a competitor may be sufficient and it does not matter whether you or Redrow benefit or act on the information. The information exchange also need not be direct.

If you are unsure whether you are permitted to share commercially sensitive information, or if you have any queries on information exchange (or competition law more broadly), contact the key contacts below.

Key Contacts	
Beth Ford Group Company Secretary	01244 520044
Neil Robinson Group Legal Director	01244 520044

9 Charitable and political donations

Charitable donations

We recognise the difference we can create through our presence as a national housebuilder by developing thriving communities through supporting the local community and charitable projects.

Redrow employees are encouraged to take part in fundraising activities for our selected local charitable partners and we have agreed, subject to a capped maximum amount per annum, to match funding to nominated charities.

Selection

Each Division should annually select a local charity to support whereby its purpose is in alignment with one of our key priorities. This allows each part of the business to choose a charity meaningful to them in the communities in which they operate.

Verification

Divisions should not make any charitable donations without verifying the reputation of the chosen charity. This should include a search on the Charity Commission website to ensure it is properly registered.

Before any donation is made, we must be satisfied that the recipient is acting in a way which is compatible with the charitable objectives and that the donations will not be used for any improper purpose.

Record keeping

A record must be kept of all charitable contributions made throughout the year.

Political donations

Redrow does not engage or support any form of political donations. No Group company or employee is permitted to make a political donation in Redrow's name.

All staff must be extra vigilant to ensure that political contributions are not made in circumstances where gifts, hospitality or the actions of third parties are engaged in transactions on our behalf.

Political donations or contributions in any form are strictly prohibited. 'Donations' or 'contributions' may range from support, financial contributions, communications, benefits-in-kind, sponsorships, gifts or use of Redrow services or products.

Employees who wish to make contributions towards political parties or candidates may do so but: it must be clear that it is in their own personal capacity and in no way affiliated with Redrow; and must ensure that any such support does not impact their work at Redrow.

Key Contacts	
Karen Jones HR Director	01244 520044
Beth Ford Group Company Secretary	01244 520044

10 Policy Reference

In order of appearance, the following policies/documents have been referred to within this Code:

- 1 Whistleblowing Policy**
- 2 Health, Safety and Environmental Policy**
- 3 Equality, Diversity and Inclusion Policy Statement**
- 4 Human Rights Policy Statement**
- 5 Partnering with our Supply Chain Policy**
- 6 Slavery and Human Trafficking Statement**
- 7 Bribery Act Policy**
- 8 Receipt of Gifts and Hospitality Policy**
- 9 Anti-Tax Evasion Facilitation Policy**
- 10 Share Dealing Code**
- 11 Data Protection Policy**
- 12 Data Protection Impact Assessment Policy**
- 13 Cyber Security Assurance Policy**
- 14 Data Retention Policy**
- 15 IT Security Policy**
- 16 Legal Rights (Personal Data) Policy**
- 17 Data Protection Guidelines**
- 18 Privacy Notice**
- 19 Email and Internet Use Policy**

The above documents are available to view via Engage and employees are encouraged to familiarise themselves with these key policies.