
Anti-Bribery and Corruption Policy

Introduction

Persimmon plc (the “Group”) is one of the UK’s leading housebuilders with regional offices and developments throughout the country. Over many years of successful operations, the Group has developed a reputation for reliability and ethical conduct. This is reflected in the Group’s long-term, mutually beneficial relationships with its supply chain. In order to uphold these values, comply with all applicable laws, and protect the best interest of the Group, the Board have formally adopted this comprehensive Anti-Bribery and Corruption Policy, as an extension to our Code of Ethics.

The aim of the Board is to establish, through this policy, a culture within the Group in which bribery and corruption are never seen as acceptable behaviours. This applies to all Group employees, businesses and operations, and extends to our relationships with all of our suppliers, sub-contractors and intermediaries.

Policy

The Group has adopted the definition of bribery as per the Business Principles of Transparency International: *‘the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust’*. The Group defines corruption as *‘any abuse of power for private gain, which can be instigated by individuals or organisations’*.

The Group maintains a zero tolerance approach to all forms of bribery and corruption, including both cash and non-cash inducements and any form of facilitation payment (payments to an official in order to expedite a process or transaction). A monitoring programme is in place to promote awareness of bribery and corruption issues, and to prevent and detect any actions contrary to the terms of this policy (see below).

Employees are expected and required to report any suspicion of bribery or corruption. Management will ensure a supportive environment and culture where concerns can be raised without fear of repercussions. The Group’s whistleblowing provision also allows concerns to be reported anonymously. All reported concerns will be investigated and, where proven, appropriate action will be taken against any individual or parties involved in bribery. This may extend to disciplinary action, suspension or termination of commercial agreements or referral to the police.

Policy Exceptions

The policy does not prohibit normal and appropriate hospitality, or the giving and receiving of gifts of a reasonable value, consistent with maintaining cordial business relationships,

providing they are proportionate, agreed with an employee's line manager and consistent with the terms of the Group's Employee Expenses Policy.

Monitoring Programme

In line with the Business Principles issued by Transparency International, the Group maintains a comprehensive suite of anti-bribery and corruption controls and oversight arrangements. These include:

- o Communication of our policy to all stakeholders via our corporate website
- o Training and awareness programmes
- o Robust and transparent tendering processes
- o Transaction authorisation controls
- o Independent whistleblowing provision for reporting concerns (see below)

The Group Internal Audit department, which reports to the Board via the Risk and Audit Committees, provides independent assurance on the effective operation of these controls and activities.

Whistleblowing/Employee Responsibility

The prevention, detection and reporting of bribery and corruption is the responsibility of all employees throughout the Group. Employees can report confidentially any suspicion of bribery or corruption via the Group's whistleblowing provision (phone 0800 0147 060, email whistleblowing@persimmonhomes.com). Whistleblowers will be protected in line with our published Whistleblowing Procedures and all relevant legislative requirements.

Contacts and support

If anyone is in doubt as to whether an action constitutes bribery or corruption the matter should be referred in the first instance to their line manager. If an employee is uncomfortable with this reporting route they may contact the Company Secretary, Group HR Director or the Group Internal Audit Manager. All are available at the Group's head office in York (phone 01904 642199).

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