

## Company policy statement Speak up

# 2021

### Why is speaking up important?

Vistry Group's success is underpinned by our strong commitment to the values of Integrity, Caring and Quality. We expect everyone at Vistry Group to uphold these values when dealing with our people, customers, suppliers and the communities in which we operate. This requires an open, honest and transparent culture where employees and suppliers feel comfortable communicating when something isn't right, without any fear of reprisal.

This is why we have a Speak up policy (previously known as "whistleblowing") so you can communicate your concerns without worrying about the consequences.

### What is our policy?

We expect everyone connected to Vistry Group who has seen, heard or suspects anything that might contradict our values to Speak up as soon as possible. If you're acting in good faith then we promise we will listen to your concerns, investigate and where appropriate, take action.

Your concerns could take many different forms, but as a guide if you feel a moral line has been crossed or feel our ethos of 'do the right thing' is compromised then it's definitely time to Speak up.

As a minimum, you must report any of the following immediately:

- *Criminal activity*
- *Failure to comply with legal requirements*
- *Miscarriages of justice*
- *Danger to health and safety*
- *Danger to the public or damage to the environment*
- *Concealing malpractice, or taking unapproved financial risks*
- *A breach of our internal policies and procedures*
- *Corruption, bribery, fraud or blackmail*
- *Failure to treat customers or communities with respect*
- *Unauthorised disclosure of confidential information*
- *Negligence*
- *The deliberated concealment of any of the above*

The Group's Speak up Policy, also covers all requirements that the Group may have to comply with in relation to the law relating to whistleblowing or protected disclosures.

### What are the aims of our policy?

The Board of Vistry Group PLC is committed to ensuring high standards of business conduct and encouraging a culture of integrity and honesty within the Group.

The aims of this policy are:

1. To encourage staff to speak up about suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
2. To provide staff with guidance as to how to raise their concerns.
3. To reassure staff that they should be able to speak up about their concerns without fear of reprisals, even if they turn out to be mistaken.

This policy covers all employees, officers, consultants, contractors, casual workers and agency workers. This policy does not form part of any employee's contract of employment and we may amend it at any time.

### Protection and support for Speaking up

It is understandable that those who raise concerns may sometimes be worried about possible repercussions. We aim to encourage openness and will support staff who speak up under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of Speaking up. Detrimental treatment includes, for example, dismissal (or termination of employment), disciplinary action, threats or other unfavourable treatment connected with or as a consequence of speaking up.

If you believe that you have suffered any detrimental treatment, you should inform your line manager or HR business partner immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

Employees of the Group must not threaten or retaliate against anyone who raises a concern under this policy in any way or form. If you are involved in such conduct, you may be subject to disciplinary action. This could include sanctions up to, or including, dismissal. In some cases you could have personal liability for compensation arising or pursued by the person who speaks up as a consequence of any detrimental treatment that you engage in toward them.

### How to raise a concern?

In the first instance, we would encourage you to speak to your line manager, however, we realise this isn't always appropriate and that's why we subscribe to EthicsPoint's 'Speak up' service so that you can report your concerns securely and anonymously if you wish. EthicsPoint are a service provider entirely independent from Vistry Group PLC and if you raise a concern through the EthicsPoint service, your message will be forwarded to the Group Company Secretary and Head of Internal Audit who will act on it in the most appropriate way. Reports submitted via this service will remain completely confidential unless you request otherwise.

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You can contact EthicsPoint by calling 0800 069 8071 or digitally through [www.vistrygroup.ethicspoint.com](http://www.vistrygroup.ethicspoint.com)

### What happens when a concern is reported?

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. Unless you have chosen to remain anonymous, we will inform you of the outcome of our assessment and you may be required to attend a meeting in order to provide further information. You may bring a colleague or union representative to any meeting under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. During this meeting, we will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential. If we conclude that false allegations have been made maliciously, disciplinary action may be taken.

### Confidentiality

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Employees who are concerned about possible reprisals if their identity is revealed should raise their concerns through InTouch, as detailed above.

### External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We encourage you to obtain advice before reporting a concern to anyone externally of the Group. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Speak up concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier, subcontractor or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You can always contact or seek guidance from your line manager or one of the other individuals set out in this policy.

### Further advice

While we cannot always guarantee the outcome you are trying to achieve, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with either the Group Company Secretary or the Head of Risk and Audit.

If you're still unsure how to move forward with a concern, then you can speak to either Chris Jones (Head of Internal Audit) or Rachel Pilcher (Senior Assistant Company Secretary) for confidential advice.

### Relevant contact details

#### EthicsPoint

Tel: 0800 069 8071  
[www.vistrygroup.ethicspoint.com](http://www.vistrygroup.ethicspoint.com)

#### Protect (Independent whistleblowing charity)

Helpline: 0203 117 2520  
Email: [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk)  
[www.pcaw.co.uk](http://www.pcaw.co.uk)

#### The Group Company Secretary

Vistry Group PLC, 11 Tower View, Kings Hill,  
West Malling, Kent ME19 4UY  
Tel: 01732 280400  
Email: [company.secretary@VistryGroup.co.uk](mailto:company.secretary@VistryGroup.co.uk)

#### Head of Risk and Audit

Vistry Group PLC, 550 Oracle Parkway,  
Thames Valley Park, Reading RG6 1RA  
Email: [internalaudit@vistrygroup.co.uk](mailto:internalaudit@vistrygroup.co.uk)



Greg Fitzgerald  
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