

## COMPANY POLICY STATEMENT

# ANTI-BRIBERY & CORRUPTION

# 2024

Vistry Group is committed to high ethical, legal and moral standards and all members of staff are expected to share this commitment.

The Company has procedures in place designed to prevent bribery and corruption from taking place and is committed to the prevention, detection and reporting of any such events and to their rigorous investigation.

The Anti-bribery and corruption policy contains examples of actions that fall within the definition of bribery and corruption.

The Company aims to prevent exposure to bribery and corruption by:

- Implementing and maintaining effective bribery and corruption prevention and detection measures to deter bribery and corruption
- Inducting staff in the Company's anti-bribery and corruption checks, controls and procedures
- Taking firm action against any individual or group taking part in acts of bribery or corruption
- Encouraging its employees to be vigilant and to report any suspicion of bribery or corruption, providing suitable channels of communication and ensuring sensitive information is treated appropriately

- Ensuring that sub-contractors, suppliers, consultants, advisors, agents and other third parties acting on behalf of the Company are aware of the Company's policy and maintain the same high standards and are encouraged to adopt their own policy
- Thoroughly and impartially investigating instances of alleged bribery or corruption, pursuing offenders and where appropriate seeking to recover property, monies and costs, through legal means if necessary
- Assisting the Police and other appropriate authorities in the investigation and prosecution of those suspected of bribery or corruption



Greg Fitzgerald  
**Chief Executive**  
January 2024