

COMPANY POLICY STATEMENT

ANTI-SLAVERY & HUMAN TRAFFICKING

2024

Vistry Group has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

The Company aims to prevent exposure to modern slavery and human trafficking by:

- Implementing and maintaining effective modern slavery and human trafficking prevention and detection measures;
- Taking firm action against any individual, group or supplier to address coercive, abusive or exploitative work practices;
- Encouraging its employees to be vigilant and to report any suspicion of slavery or human trafficking, providing suitable channels of communication and ensuring sensitive information is treated appropriately;
- Ensuring that sub-contractors, suppliers, consultants, advisers, 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 slavery or human trafficking;
- Assisting the Police and other appropriate authorities in the investigation and prosecution of those suspected of slavery or human trafficking.
- Maintaining our commitment as a Real Living Wage employer and monitoring our compliance through regular audits.



Greg Fitzgerald
Chief Executive
January 2024