

COMPANY POLICY STATEMENT

ETHICAL CODE OF CONDUCT

2024

Vistry Group is committed to high ethical and moral standards and all employees are expected to share this commitment.

Integrity, transparency and trust are a valued part of the Company's culture that support tangible business benefits and a positive working environment.

The Company has created a framework for responsibility designed to reflect its values and engage staff in delivering our standards and appropriate behaviours.

The responsibility framework is delivered through this Code and the supporting policies which set out the Company's approach to Anti-bribery and Corruption, Anti-fraud, Anti-money laundering, Equal opportunities, and Whistleblowing plus the independent confidential reporting service.

Accountability is shared by all staff and our policies set out rights as well as responsibilities. Employees should refer to the Code of Conduct Policy for further information.

The Company's Ethical Code of Conduct means:

- We respect the rule of law and aim above basic compliance with legislation and regulations
- We speak out about corrupt or otherwise unacceptable business practices and never knowingly participate in or condone such activity
- We treat each other with respect, combine our expertise and provide a fair working environment for all, encouraging everyone to achieve their maximum potential

- We act as an equal opportunities employer, promote diversity in our workforce, observe human rights and will not exploit labour
- We promote a strong culture of health and safety, and environmental and social awareness for the benefit of our staff, customers, suppliers and third parties
- We have concern for all people affected by the Company's operations and the products and services we offer and we do our best to keep our promises and get things right first time
- We aim to deliver continuous improvement in the quality of the products and services we offer
- We never knowingly engage in areas of business activity incompatible with social inclusion
- We seek assurance that our suppliers and business partners maintain similar standards to our own and require equivalent levels of conduct from any party that we interact with or who acts on our behalf
- We know what our values are, what we stand for and we do what is right



Greg Fitzgerald
Chief Executive
January 2024