

## COMPANY POLICY STATEMENT ANTI-FRAUD

# 2025

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

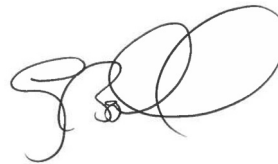
The Company has procedures in place that reduce the likelihood of fraud and is committed to the prevention, detection and reporting of any fraud and to the rigorous investigation of any such cases. Vistry is committed to transparency, encouraging all parties to be vigilant and to report any suspicion of fraud, providing suitable channels of communication and ensuring sensitive information is treated appropriately.

Any concerns of fraud should be raised at the earliest possible stage to internal audit, either by direct contact with a member of the team or by emailing [internalaudit@vistry.co.uk](mailto:internalaudit@vistry.co.uk).

The Anti-fraud policy contains examples of actions that fall within the definition of fraud.

The Company aims to control exposure to fraud by:

- Implementing and maintaining effective fraud prevention and detection measures to deter fraud
- Taking firm action against any individual or group perpetrating an actual or attempted fraud against the Company, its suppliers, customers and other stakeholders
- Encouraging its employees to be vigilant and to report any suspicion of fraud, providing suitable channels of communication and ensuring sensitive information is treated appropriately
- Thoroughly and impartially investigating instances of alleged fraud, pursuing offenders and seeking to recover property, monies and costs, through legal means where appropriate
- Assisting the Police and other appropriate authorities in the investigation and prosecution of those suspected of fraud



Greg Fitzgerald  
**Chief Executive**  
January 2025