

COMPANY POLICY STATEMENT COMPETITION LAW

2025

Vistry Group believes that the marketplace should be fair, open and unrestricted and we will always comply with competition and anti-trust laws wherever and with whomever we are doing business. This means that we never behave in a way that could be perceived as price-fixing, market sharing, bid rigging or information gathering regarding competitor bids, tenders or land offers.

Vistry Group therefore commits to ensuring the highest possible standards of competition law compliance by adhering in all of its business practices to the principle of fair competition. We all have a responsibility to ensure the company does not engage in conduct which could be regarded as anti-competitive.

Our employees and representatives must therefore ensure that:

- Vistry Group does not restrain competition with our competitors through agreements, arrangements or understandings that could restrict competition
- Vistry Group's bids for contracts, tenders or land opportunities occur independently and without any agreement or arrangement with any of our competitors
- Vistry Group will not exchange competitively sensitive information or engage in discussions that may lead to the co-ordination of anti-competitive behaviour and, in particular, will not share information about current or future pricing intentions for tenders, sales or land procurement, or any element that might affect prices or pricing practices
- All mandatory training, including any competition law training, is undertaken and the appropriate pass rates achieved
- Vistry Group will also promote understanding of and compliance with competition law throughout its supply chain, including subcontractors

We do recognise that in certain circumstances it is appropriate to talk to a competitor when discussing operational matters relating to, for example, joint ventures or consortium sites. When this takes place please remember the rules above and ensure meetings and conversations do not stray beyond what is relevant. Should you feel uncomfortable or believe discussions may have become inappropriate, cease the conversation immediately and ensure your concern has been minuted.

Remember that anti-competitive behaviour is likely to be a criminal offence, which could result in fines and imprisonment for the individual(s) involved. Should you see or hear any anti-competitive behaviour then you must Speak up and report it immediately. Guidance can also be found on the Competition and Market Authority or you can seek advice from one of our approval panel of law firm providers.



Greg Fitzgerald
Chief Executive
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