

# SUMMARY OF COMPANY POLICIES

# 2025

All of our Vistry Group (the “Group”) policy statements are available, in full, on our Group intranet and the Vistry Group website. Below is a brief summary of each one. If you feel any policy is being breached, please contact your line manager or the Speak up helpline.

POLICY	WHAT YOU NEED TO KNOW
Anti-bribery & corruption	We have procedures in place designed to prevent bribery and corruption from taking place and are committed to the prevention, detection and reporting of any such events and their rigorous investigation.
Anti-fraud	We have procedures in place that reduce the likelihood of fraud and are committed to the prevention, detection and reporting of any fraud. Robust action will be taken against any individual or group perpetrating an actual or attempted fraud against the Group.
Anti-money laundering	We have procedures in place designed to prevent money laundering from taking place and are committed to the prevention, detection and reporting of any such events. Employees should be vigilant and report any suspicion of money laundering.
Anti-slavery & human trafficking	We put measures in place and take action to support a zero tolerance approach to modern slavery - any suspicions should be reported via the confidential Speak up helpline or to the Police.
Business continuity	Each regional business unit and Vistry Services function is required to maintain a business continuity plan, in order to minimise the impact of serious disruption to our operations.
Climate change	We recognise the urgent need to reduce greenhouse gas emissions to avoid the worst impacts of climate change. We acknowledge the need to mitigate climate change risks associated with the homes and communities we build, whilst at the same time reducing the greenhouse gas emissions associated with our operations.
Diversity & Inclusion	We believe that a diverse and inclusive culture is essential to the long-term success of Vistry Group enabling us to be proactive in addressing our diverse customer and wider stakeholder needs. This is reflected in our diversity and inclusion policy, which applies to the Board and Group as a whole. Our aim is to build and sustain an inclusive culture and diverse workforce at Vistry Group. This policy reflects our approach to achieving a similarly diverse and inclusive Board of Directors. We believe in encouraging initiatives that promote broader inclusive diversity both at a Board level and across Vistry Group, in line with our core values.
Competition Law	We believe 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.
Environment	We seek to optimise our impact on the environment as far as practicable, and aim to influence our suppliers and contractors to do likewise. The Board of each Business Unit and, ultimately, the ELT is responsible for environmental matters. Environmental incidents should be reported in accordance with Group procedures.
Ethical code of conduct	All employees are expected to share our commitment to high ethical and moral standards.
Health, safety & welfare	The creation of healthy and safe workplaces that minimise the likelihood of injury or ill health is central to our mission. The Chief Executive has executive accountability for health and safety matters. Each region is responsible for health and safety matters. All incidents must be reported in accordance with reporting procedures. There shall be no compromises with regard to health and safety in our offices or developments, with appropriate monitoring arrangements in place.
Speak up - Whistleblowing	We are committed to ensuring high standards of business conduct and encouraging a culture of integrity and honesty within the Group. All employees are expected to carry out their duties in an ethical manner and report any concerns. Employees (and other stakeholders) can do this in confidence using the confidential Speak up hotline, if they feel they cannot raise their concerns with their line manager.
Sustainability	We recognise that our operations and supply chain may have a negative impact on the environment, and we will minimise this. Vistry has set emission reduction targets for Scopes 1, 2 and 3 as well as for waste reduction. We annually review our targets and performance to ensure it remains aligned with our strategy.
Vulnerable customer	Vulnerable customers are likely to need additional assistance, at some stage, to avoid detriment (financial or psychological) when purchasing a home. It is important for us to consider what reasonable steps might be taken to amend our usual processes, to ensure that the customer is treated fairly and so deliver a positive outcome for the customer.
Quality Assurance	Quality is fundamental to our business and we endeavour to operate to the highest standard in all of our activities. We work with our stakeholders to meet their objectives to deliver the highest standards and our policy sets out how we achieve this.
Corporate Criminal Offence	We endeavour to conduct business in a legal, honest and ethical manner. We take a zero-tolerance approach to tax evasion. You must not engage in any form of facilitating tax evasion, whether under UK law or under the law of any foreign country. You must immediately report to your line manager any request or demand from a third party to facilitate the evasion of tax, or any concerns that such a request or demand may have been made.