



ANTI- COMPETITIVE PRACTICE POLICY

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ANTI-COMPETITIVE PRACTICE POLICY

Policy statement: Vital Holdings Ltd and its subsidiaries (the Company) is committed to compliance in full with all laws and regulations governing our business including laws relating to competition. The Company strives to adhere in all business practices to the principle of fair and effective commercial competition between businesses.

POLICY PURPOSE

Given the size and complexity of our supply chain, we have a responsibility to ensure that all employees and suppliers understand what the law requires and act accordingly. We will not engage in conduct which is anti-competitive, nor will we enter into agreements with other companies or organisations (whether private or publicly owned) which could, or do, or intend to restrict, prevent or distort competition in any market in which we operate. This policy provides our employees and those who work on our behalf with the information they need to ensure compliance with both regulation and our Company values and sets out the standards of behaviour we expect to be adhered to.

ROLES AND RESPONSIBILITIES

This policy applies to all Vital employees and those working on our behalf; everyone is responsible for ensuring the policy is adhered to. Any employees with responsibility for procurement or dealing with our customers and supply chain have particular responsibility under this policy. Every person employed in a work winning, bidding, commercial or marketing role has to obey the law every day, in every discussion they have with customers and others with whom they come into contact.

This is one of a suite of policies intended to communicate our values and standards to all stakeholders, fostering confidence that Vital is a responsible company to work for, buy from, invest in and partner with. This policy is owned by the Commercial Directors with ultimate oversight resting with the Vital Group Board, including the approval of any changes to the policy.

DEALING WITH SUPPLIERS

The Company sets its own selling prices and must be free to decide the price at which it sells products and services to its customers. We can negotiate with suppliers to give us their best prices, but the price we offer customers should not in any way be fixed with a supplier.

DEALING WITH COMPETITORS

The Company will never work with competitors to reduce competition in the marketplace and will always encourage fair competition. Competition law assumes that markets generally work best when competitors compete, rather than co-operate.

The Company will not (however informally) discuss, agree or exchange information with competitors on:

- ▶ The prices the Company charges customers or pays suppliers
- ▶ The margin the Company achieves on sales
- ▶ The promotions or discounts the Company offers
- ▶ The Company's future pricing or promotions strategy
- ▶ Where, what or to whom the Company sells

The Company will not ask competitors for this type of information. Nor will the Company ask intermediaries, for example representatives of industry bodies, who may be privy to this type of information about the Company's competitors, beyond acquiring general market intelligence.

Gary Fielding
Chairman

Date: December 2023

PREVENTING ANTI-COMPETITIVE PRACTICES

The Company has in place a number of measures to prevent, detect and prohibit anti-competitive practices, including training for Board members, Executive officers and identified key employees. All employees are encouraged to remain vigilant in preventing, detecting and reporting any incidences of anti-competitive practices. Concerns should be raised in accordance with this Policy and the Company's Whistleblowing Policy. The Company operates a certified ISO 9001 Quality Management System and is externally audited annually. The seven principles of quality management (engagement of people, customer focus, leadership, process approach, improvement, and evidence-based decision-making) all contribute towards the Company's ability to prevent, detect and prohibit anti-competitive practices. The Company will fully investigate any instances of alleged or suspected bribery, in accordance with our Anti-Bribery Corruption Policy, Whistleblowing Policy and Disciplinary Policy and procedures.

CONTINUAL IMPROVEMENT

As part of our commitment to openness and transparency, we will communicate this policy to all employees and organisations working on our behalf and ensure the latest version is available on our website for interested parties to view it openly as appropriate. This policy will be reviewed at least annually.

Ian Whitelock
CEO

Date: December 2023