

COMPETITON LAW POLICY STATEMENT

Soil Engineering Geoservices Limited (SEGL) is a specialist geotechnical contractor carrying out ground investigation, foundation, and specialist geotechnical work for the construction industry.

The Competition Law Policy (“the policy”)

Soil Engineering Geoservices Limited (SEGL) is committed to adhering strictly to all competition laws.

We are wholly supportive of open and fair competition in this regard and do not condone any activity which might in any way unfairly restrict the level of competition expected by our clients and procuring authorities. We will do all that we can to ensure that those procuring our services enjoy fully the benefit of open and fair competition.

The potential consequences of breaching competition law are serious for Soil Engineering Geoservices Limited and individual employees. Accordingly, it is Soil Engineering Geoservices Limited policy to ensure that its activities are conducted in accordance with all competition laws. Detailed Standards/Guidance will be provided to Soil Engineering Geoservices Limited employees to ensure they are conversant with relevant competition law/best practice and how it may impact on their job role in Soil Engineering Geoservices Limited.

Material and/or deliberate disregard of this Policy or the related Standard/Guidance will be viewed very seriously and may be regarded as a disciplinary matter.

This Policy is supplemental to and should be read in conjunction with other Soil Engineering Geoservices Limited Policies and documents, As a wholly owned subsidiary of VINCI, these also include the VINCI Code of Ethics and Conduct, VINCI Anti-Corruption Code of Conduct, and the VINCI Group Code of Ethics.

If employees are uncertain about the application of this Policy or the related Standards/Guidance to their day-to-day activities, or are uncertain about the legality of an agreement, arrangement or course of conduct they should always seek advice from their line manager or a Board Director.



Tristan Llewellyn
Managing Director
May 2026

1. Purpose

To set out Soil Engineering Geoservices Limited policy in relation to competition law compliance.

2. Introduction

Competition law is designed to protect businesses and consumers from anti-competitive behaviour. The law stimulates effective competition which results in open, transparent, dynamic markets with enhanced productivity, innovation and value for our clients and other procuring authorities.

The UK construction industry is considered by the Competition and Market Authority’s (“CMA”) to be an industry of increasing concern in relation to potential breaches of competition law. As a consequence, the CMA has become increasingly active in educating businesses about illegal practices and investigating potential infringements of competition law in the construction industry.

Approved by:
LLEWELLYN Tristan



(Managing Director)

Approved by:
RODGERS Paul

(Technical Manager)

Ref:SENG-MAN-PO-COLA

Date: 01/04/2026 **Page** 1 of 3

The intranet version is the ‘Controlled’ copy of this document, once printed it becomes ‘Uncontrolled’.
Please check the company intranet site to ensure that the latest version is held.

The CMA has considerable powers of investigation including but not limited to powers to require production of documents or information, to enter and search premises to conduct investigations, to use informers and whistle-blowers, and to impose penalties of up to 10% of global turnover and criminal sanctions in cases of infringement.

This document is a statement of Soil Engineering Geoservices Limited Policy on competition law compliance.

3. Compliance with the Law

Soil Engineering Geoservices Limited is required to comply with competition law and the Soil Engineering Geoservices Limited Competition Law Policy and Code of Ethics and Conduct. Competition law develops and evolves over time but the most important sources of law at present are the Competition Act 1998, which prohibits anti-competitive agreements and the abuse of a dominant position, and the Enterprise Act 2002, which introduced criminal sanctions for cartels (e.g., price-fixing and bid-rigging) (hereafter the "Competition Law").

The consequences of infringing Competition Law are extremely serious both for individual employees, Soil Engineering Geoservices Limited and for the wider VINCI Group. Following an investigation by the CMA, a finding of infringement under the Competition Act 1998 or Enterprise Act 2002 may result in:

- substantial fines on Soil Engineering Geoservices Limited (up to 10% of VINCI Group turnover);
- exclusion from future tender opportunities;
- unenforceability of agreements entered into by Soil Engineering Geoservices Limited;
- substantial damages payable by Soil Engineering Geoservices Limited;
- damage to Soil Engineering Geoservices Limited corporate reputation;
- wasted management time and cost (including external costs) in dealing with investigations and legal proceedings;
- fines and/or imprisonment for up to 5 years for directors or employees found guilty of participating in "hard core" cartel activity.
- up to 15 years disqualification of directors who have participated in, or who negligently failed to take action against, anti-competitive agreements or conduct by Soil Engineering Geoservices Limited.

Practices which are regarded as being anti-competitive include any agreements between businesses, decisions by associations of businesses (such as Trade Associations), or concerted practices which have the effect of preventing, restricting or distorting competition, or are intended to do so, and which may affect trade.

Specific practices identified as being anti-competitive and in breach of the Competition Laws include the following:

- passing to any competitor any information on Soil Engineering Geoservices Limited pricing or pricing policy, including giving or receiving a cover price;
- fixing purchase or selling prices (including tendering prices) or other trading conditions;
- agreeing with competitors, suppliers or customers to limit or control production, markets, technical development or investment;
- agreeing with competitors to divide or share markets (whether geographic, work type or otherwise);
- agreeing with competitors not to bid for tenders or to withdraw a bid or to allocate bids on a rota basis or any other form of bid-rigging;
- agreeing with competitors to discriminate against particular suppliers or customers, including a collective boycott.

3.1 Risk Assessment

Soil Engineering Geoservices Limited will assess the risks posed to the company in a changing market place to assess the nature and extent of potential competition law exposure. Such risk assessment shall be carried out by appropriately qualified employees, properly documented and updated as necessary.

3.2 Guidance and Training

The Competition Law Compliance Policy provides guidance to Soil Engineering Geoservices Limited employees to ensure they are conversant with relevant competition law/ best practice and how it may impact on their job role at Soil Engineering Geoservices Limited. In that respect the Policy explains what is permitted and not permitted under Competition Law in sufficient detail so as to enable employees to find answers to specific practical questions or to know who they should approach for guidance.

Soil Engineering Geoservices Limited mandate compulsory E-Learning in connection with Competition Law, Conflict of Interests and Anti-Corruption by all salaried staff.

Areas that are covered explicitly are as follows:

- the obligation on all employees to comply with Competition Law;
- the policy to cooperate with the CMA in relation to investigations;
- contacts with competitors, and when communications / dialogue become problematic from a competition perspective;
- the impact on our supply chain;
- document retention / destruction;
- use of language including “secret” or “coded” communications;
- consequences of breaching this Policy (which may be treated as gross misconduct);
- what action to take in the event of discovering an infringement of Competition Law, or reasonably suspecting a possible infringement.

Dawn Raid Guidance has also been provided to provide guidance as to how to react to the arrival of a CMA search team and what to do next.

Soil Engineering Geoservices Limited will also provide appropriate Competition Law education and Anti-Corruption training to all employees through a variety of means, including mandatory E-Learning.

3.3 Updates

Competition Law is continually developing. Soil Engineering Geoservices Limited will remain abreast of key developments in this area of law (e.g. in relation to the types of practices that the CMA finds to be anti-competitive in the construction sector) and ensure the Guidance / Standards and training are updated in a timely manner.

3.4 Reporting, Referral and Questions

Soil Engineering Geoservices Limited divisional management will report promptly to Vinci Group any infringement of Competition Law, or reasonable suspicion of an infringement.

Employees having a concern about a Competition Law matter should raise the issue with their line manager, or a Board Director.

If employees continue to have concerns and / or feel that they are unable to raise an issue in this way they should raise the matter using the ‘Protect’ helpline.

Tel: 020 3117 2520

Web: <https://protect-advice.org.uk/>

The Advice Line is open: Mondays, Tuesdays, Thursdays: 9:30am – 1pm, 2pm – 5:30pm; Wednesdays and Fridays: 9:30am – 1pm.

all calls are taken by ‘Protect’, an independent organisation with impartial staff trained to handle these types of calls.