



Supplier Code of Conduct

September 2025



Introduction and Scope

The Supplier Code of Conduct outlines the principles and minimum standards expected of all Suppliers, contractors, and business partners of Tritax Management LLP ("Tritax") and funds managed by Tritax. It is designed to ensure that all parties who work with Tritax and funds under its management operate in a legal, ethical, and responsible manner. We expect our Suppliers to require the same standards of their own Suppliers, contractors and business partners.

The Supplier Code of Conduct should be read in conjunction with our detailed policies that support this Code.

Fraud, Bribery and Corruption

Tritax prohibits the offering, giving, solicitation or acceptance of any bribe (whether in cash or otherwise) to or from any person or company (including public officials), wherever they are situated, by any individual or group, whether they be employees, agents or other persons or bodies acting on Tritax's behalf.

Facilitation payments are not permitted. Facilitation payments are defined as payments demanded by officials (or others) simply to secure or expedite the performance of their normal duties (for example, granting a licence, allowing goods to cross a border, and so on). These are commonplace in some jurisdictions, but the making of such payments, regardless of how small, is an offence under the Bribery Act 2010.

We do not tolerate fraudulent practices among our employees and business partners or a behaviour in which deception is used to obtain a business advantage.

Breaches of Tritax's 'zero-tolerance' approach towards acts of bribery and corruption by business partners acting on its behalf will lead to a review of Tritax's contracts and relationship with such partners.

We expect our Suppliers to act in accordance with these principles and commitments as set out in our Anti-Bribery and Corruption Policy.

Bullying, Harassment and Discrimination

We expect our Suppliers to strictly prohibit any kind of harassment, intimidation, bullying or abuse of any employee, including through the threat of physical punishment or disciplinary action.

We expect our Suppliers to provide equal access to employment, training and other opportunities without discrimination.

Human Rights

We are committed to acting in accordance with the UN Guiding Principles on Business and Human Rights, the UN Global Compact, and the international standards set out by the eight core International Labour Organisation (ILO) conventions and recommendations.

We expect our Suppliers to act in accordance with these principles and commitments as set out in our Human Rights Policy.

Modern Slavery and Employment

Suppliers are required to adhere to Tritax's Anti-Modern Slavery Standards as set out in the Anti-Modern Slavery Policy.

Suppliers are obliged to alert Tritax of any breaches in terms of the Standards and Modern Slavery Act 2015 that are relevant to Tritax.

In relation to any breaches, Suppliers must notify Tritax of any remedial action that is being taken with timescales for resolution and provide updates as the resolution progresses.

Should Suppliers not cooperate, Tritax will escalate the issue internally and an assessment of termination of contract will be made on a case-by-case basis.

Suppliers shall ensure its employees understand their employment conditions and give employees fair and reasonable pay as well as any legally entitled or agreed benefits.

We encourage Suppliers to pay at least the Living Wage and adopt prompt payment for their subcontractors.

Health and Safety

We expect our Suppliers to provide healthy and safe working conditions for employees and contractors, in accordance with national laws and international standards.

This includes:

- Putting in place mechanisms to ensure that health and safety obligations are communicated and applied to all parties under its control
- Meeting the general principles of health and safety risk prevention. General principles include identifying, minimising, and preventing hazards, using competent and trained people, providing, and maintaining safe equipment and tools, including required personal protective equipment at the expense of the Supplier
- Ensuring all employees are trained and understand their obligations for health and safety
- Ensuring systems are in place to monitor and respond to health and safety incidents. This includes having procedures in place to recording, investigating, and implementing learning points from accidents and emergency situations

Corporate Responsibility

We expect Suppliers to comply with all relevant environmental legislation and international standards and are committed to monitoring and engaging with our Suppliers on their environmental performance.

We expect Suppliers to put in place systems to manage their environmental and social impacts, including:

- Appropriate environmental management systems
- Collecting and maintaining all necessary environmental permits and registrations
- Sourcing materials responsibly, avoiding knowingly purchasing conflict materials and committing to sourcing certified timber
- Minimising and controlling all hazardous air pollutants and emissions, including seeking to be energy and carbon efficient
- Promoting recycling and avoiding sending waste to landfill
- Monitoring and where possible reducing water consumption
- Assessing and managing impacts on biodiversity
- Minimising the consumption of raw materials through efficient resource use and sustainable sourcing
- Supporting green procurement through prioritising environmentally preferable products and services wherever feasible
- Ensuring that working hours comply with applicable local labour laws
- Not using wage deductions as a form of discipline. All compensation practices must be fair and compliant with applicable local labour laws
- Paying overtime at a rate equal to or higher than the minimum amount prescribed by local labour laws
- Providing employees with clear documentation of their wages and benefits

We encourage Suppliers to support local community and charitable causes relevant to their organisation, and where there is opportunity, to support businesses and employment. We expect Suppliers to maintain positive relationships with local communities and minimise disruption.

Raising Concerns

We have a Whistleblowing Policy in place to ensure that our Suppliers and associates know who to contact should they suspect any form of qualifying disclosures of, as defined by the Public Interest Disclosure Act 1998. Suppliers and associates are encouraged to speak out and will be protected from detriment or criticism if a disclosure is made in good faith.

Suppliers can submit details of their concerns through an independent, dedicated telephone line, which is stated in the Whistleblowing Policy.

Reporting, Monitoring and Corrective Action

All existing and new Suppliers are required to provide essential compliance information as part of our onboarding process. We expect Suppliers to monitor ongoing compliance with the Supplier Code of Conduct and identify and rectify any issues. Suppliers are required to report any breaches to Tritax and agree corrective action. We are committed to working with our Suppliers to uphold the principles set out in this Code of Conduct and meet regularly with our Supplier's senior management teams to discuss their compliance in further detail.

Henry Franklin

Partner, Chief Operating Officer

Tritax Management LLP