TRITAX®

Supplier Code of Conduct

Tritax Management LLP - Supplier Code of Conduct

We value our relationships with our suppliers and want to build long-lasting partnerships. We want to work with suppliers that share our values and help us achieve the highest standards in our supply chain, whist achieving wider social, economic and environmental benefits.

This Supplier Code of Conduct outlines the principles and minimum standards expected of all suppliers, contractors, and business partners (together, "Suppliers") of Tritax and funds managed by Tritax. It is designed to ensure that all entities who work with Tritax and funds under its management adopt and maintain practices to operate in a legal, ethical, and responsible manner. If you are not complying with these minimum standards already or fail to meet these standards during your engagement with us, it is important that you inform us as soon as possible and demonstrate the steps you are taking to address any shortfalls.

From time to time, we may request KPI information from you to measure, assess and improve performance. Examples of such KPI information are indicated below, but these are not exhaustive. We expect our Suppliers to require their own suppliers, contractors and business partners to comply with the minimum standards set out in this Code of Conduct. We value the relationships we have with all our Suppliers and look forward to working with you to achieve these goals.

Legal Compliance

Suppliers are expected to comply with all applicable laws, regulations, and standards in the jurisdictions in which they operate. This includes (but is not limited to) laws related to labour, human rights, health and safety, environmental responsibility, modern slavery, anti-bribery and corruption, facilitation of tax evasion, gifts, hospitality and sanctions compliance.

Suppliers must take all reasonable steps to prevent fraud in connection with their business activities with Tritax. This includes implementing and maintaining effective fraud prevention procedures to adhere to the Bribery Act 2010, the Criminal Finances Act 2017 and the Economic Crime and Corporate Transparency Act 2023. To that end, the Supplier shall not accept, offer, promise, pay, permit or authorise any unlawful or improper payments or benefits, evade or facilitate the evasion of tax, engage in, condone, or facilitate any fraudulent activity (including but not limited to, false representation, failure to disclose information, abuse of position, false accounting or fraudulent trading).

We may ask you to provide details of your policies, your training and compliance programme, and details any infringements and how these were addressed.

Ethical workplace practice

It is important to us that we collaborate with Suppliers who hold themselves to high ethical standards and promote confidence to speak out against wrongdoing amongst their workforces. In addition to complying with the legislative requirements set out above, Suppliers are expected to conduct business with integrity and transparency, having effective procedures in place to safeguard against any form of discrimination of employees, promote equal opportunities, ensure its employees understand their employment conditions, give employees fair and reasonable pay as well as any legally entitled or agreed benefits (paying the mandatory National Living Wage and striving to pay the real Living Wage in the region in which they operate) and adopt prompt payment for its subcontractors. Tritax does not tolerate any form of harassment in the workplace, including sexual harassment, and expects suppliers to take appropriate preventative measures as part of the service provided to Tritax.

The use of slavery and human trafficking is unacceptable and entirely incompatible with our ethics as a business. All efforts should be made to eliminate it from our supply chains. Suppliers are required to comply with all anti-slavery and anti-trafficking laws and Tritax's Human Rights Policy. In the event of a breach, suppliers must notify Tritax of the nature of the breach, the remedial action being taken and timescales for resolution, together with updates as the resolution progresses.

We may ask you to provide details of your policies including your Modern Slavery Statement, if applicable, report workplace satisfaction and diversity statistics, the percentage of your employees paid the real Living Wage and your modern slavery compliance training programme.

Health and Safety

Suppliers are expected to provide safe working conditions for employees and contractors which comply with legislation, industry standards and Tritax's Health and Safety Policy (available on our website). This includes ensuring health and safety obligations are communicated and applied to all parties under its control, potential hazards are identified and managed, competent and trained people are employed, safe equipment and tools are provided and maintained, and procedures are in place to record, investigate, and learn from accidents and emergency situations. We promote a culture where health and wellbeing are supported through development and training, and we encourage our suppliers to do the same.

We may ask you to report the number and nature of serious incidents and how these were addressed, certification status (for example ISO 45001), enforcement action history from the Health and Safety Executive or Health and Safety Officer, and health and safety audit outcomes.

Data Protection, use of AI and Information Security

We expect a high standard of information security from our Suppliers. Suppliers are required to comply with all data protection laws and requirements (including the UK GDPR) when processing any personal data on Tritax's behalf, have in place appropriate measures to protect the integrity and confidentiality of Tritax data, and ensure that there is no unauthorised access to the information by third parties. Suppliers are expected to ensure that any AI systems developed or used by it are robust, secure, and safe throughout their entire lifecycle and comply with all applicable laws and regulations (including, without limitation, data protection and privacy). Suppliers must not use or retain Tritax's data or confidential information for the purposes of training or inputting into any AI system or model without prior written approval of Tritax.

We may ask you to provide details of your cyber security accreditation (for example Cyber Essentials) and evidence of your cyber security, privacy and resilience management plans.

Sustainability

We operate our business and manage our funds in a sustainable way, minimising our impact on the environment and ensuring we engage with and support local communities to thrive. We favour suppliers and contractors who operate sustainably and expect our suppliers to manage and minimise their environmental and social impacts, working with us to achieve high standards of environmental, social and ethical conduct. This includes (but is not limited to):

- Complying with all relevant environmental legislation, international codes, regulations and standards.
- Maintaining positive relationships with local communities when working on our behalf by showing local communities respect and consideration, supporting local businesses and employment where possible.
- Taking actions to minimise the risk of pollution and use landfill as an absolute last resort.
- Identifying, measuring and managing environmental impact, taking action to reduce negative environmental impact from energy and water consumption, waste generation and biodiversity impacts and continually improve environmental performance.
- Working with us to reduce our operational and embodied carbon emissions from our existing buildings and new developments by:
    - Procuring renewable sources of energy, where possible
    - Minimising consumption of raw materials
    - Promoting reuse and recycling while avoiding sending waste to landfill
    - Reducing the carbon footprint of materials
    - Minimising hazardous air pollutants and emissions
- Conducting supply chain due diligence to ensure that materials have been sourced sustainably and transparently, certified to an industry standard or procured in line with a recognised responsible sourcing scheme (where applicable) and ensure that no modern slavery has occurred within its operations and supply chain to produce the goods that they use.
- Support sustainable procurement through prioritising environmentally preferable products and services (including renewable energy) wherever feasible.

We may ask you to report your total carbon emissions, including energy and water consumption and waste generation. For new developments, we may ask you to provide Environmental Product Declarations (EPDs) of construction materials.

Onboarding and monitoring

All existing and new Suppliers are required to comply with this Code of Conduct and provide essential compliance information. We are committed to monitoring and engaging with our Suppliers on their performance (including environmental performance) and may request updated compliance and KPI information at intervals depending on the nature of supplier and the service being provided. We have performance review meetings with many of our professional services suppliers, in which we assess continuing compliance with this Code of Conduct. Conflicts of interest must be avoided, and any potential conflicts must be disclosed to your Tritax contact as soon as possible.

Speaking up

Suppliers are encouraged to report any concerns of unethical working practices on a confidential basis via **0800 915 1571** or online at www.safecall.co.uk/report. This service is managed by Safecall, an independent and confidential service operating 24 hours a day, seven days a week. Suppliers will be protected from detriment or criticism from disclosures made in good faith. Suppliers should ensure that their employees are aware of Tritax's dedicated hotline for raising concerns.

Non-compliance

In the event you are not yet compliant with any requirements of this Supplier Code of Conduct, or during your engagement with Tritax you encounter any failures in internal procedures which result in a failure to comply, please inform your Tritax contact as soon as possible. It is important that we are able to satisfy ourselves that steps are being taken to meet these minimum standards.

Please be aware that if you do not meet the minimum requirements of this Supplier Code of Conduct or inform us of any breaches, it may result in early termination of the agreement between us. This Supplier Code of Conduct will evolve over time to reflect changes in the environment in which we operate.

Where any part of this Supplier Code of Conduct conflicts with the contractual terms agreed between Tritax and the Supplier, the contractual terms shall prevail.

July 2026