



Whistleblowing Policy

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Version	Owner	Reviewer	Date
1.0	Catherine Fry	Krishma Vilkhov	November 2025
2.0	Catherine Fry	Krishma Vilkhov	September 2026

Introduction

Tritax Management LLP (“TM LLP” or the “firm”) is committed to good governance and to providing a fair and effective mechanism for staff to raise whistleblowing concerns responsibly. We are committed to resolving concerns raised as soon as possible to ensure the best client care and high standards of practice. This policy sets out the guiding principles for ensuring that whistleblowing issues are dealt with in a fair, timely and consistent way across the firm.

This policy has been developed in accordance with the Public Interest Disclosure Act (“PIDA”) 1998 (and any subsequent amendments), whereby those who raise legitimate concerns about specified matters, or “protected disclosures”, are protected from being treated badly or dismissed.

All of us at some time may have concerns about what is happening at work. When such issues are about possible unlawful conduct or financial malpractice, it can be difficult to know what to do. Individuals may be worried about raising such issues for a variety of reasons, so the firm has introduced this policy to provide guidance. The firm would prefer individuals to raise a concern at an early stage rather than wait until they have proof. Raising concerns promptly is in the interests of the public, clients, staff and the firm.

Scope

This policy applies to all equity partners, UK employees, casual and agency workers, students, volunteers, contractors, secondees and officers (collectively referred to as staff in this policy). Additionally, this policy applies to non-executive directors (“NEDs”), employees or workers of any Company externally managed by the firm or where the firm acts as Advisor.

The firm may also receive whistleblowing disclosures from suppliers, service providers and other third parties connected with the firm’s business operations. Volunteers and independent/self-employed consultants may raise any concerns as per the stated procedures. Whilst the statutory protections available under the Public Interest Disclosure Act 1998 (PIDA) may not apply to all such individuals, the firm will treat all disclosures seriously, investigate concerns as appropriate and seek to ensure that no individual suffers detrimental treatment as a result of raising a concern in good faith.

Statement

The purpose of this policy is to ensure that staff are able to raise their concerns about malpractice, illegal acts, breaches of codes of conduct and other concerns of a legal or ethical nature, which may have an impact upon or threaten the wider public interest. This is commonly known as “whistleblowing”.

This policy does not form part of any employee’s contract of employment, and we may amend it at any time.

The content and procedures within this policy are proactively communicated to all employees.

Roles and Responsibilities

The person raising the reportable concern is responsible for:

- Raising the concern as soon as possible in an objective and factual way, using this policy and accompanying procedures.
- Keeping records where possible of any incidents and potential witnesses.
- Cooperating with any investigation, if appropriate, including being available for interview (notice will be given), providing a statement and/or documentation.
- Maintaining confidentiality of clients and staff and any other individuals concerned.

Performance managers

Performance managers are responsible for:

- Ensuring that all employees are familiar with and have access to this policy.
- Complying with procedures and principles as outlined.

- Ensuring concerns raised are taken seriously and responding to concerns in a timely fashion.
- Evaluating the basis of any claim brought to their attention and referring upwards to a more senior manager, if appropriate.
- Respecting confidentiality when handling sensitive/confidential information and maintaining anonymity where necessary.

What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. Examples include (but are not limited to):

- Financial impropriety, fraud, mismanagement or money laundering
- Danger to health and safety
- Damage to the environment
- Bribery or corruption
- Facilitating tax evasion
- Failure to comply with legal duty
- Criminal acts
- Miscarriage of justice
- Modern slavery, human trafficking or exploitation
- Bullying, harassment, sexual harassment, discrimination, victimisation or other serious misconduct
- Deliberate concealment of information related to the above examples.

A whistleblower is a person who raises a genuine concern relating to any of the above. If employees have any genuine concerns related to suspected wrongdoing or danger affecting any of the firm's activities (a whistleblowing concern) they should report it under this Policy.

The firm must allocate responsibility to the Whistleblowing Champion for overseeing the integrity, independence and effectiveness of its whistleblowing policies and procedures, including those policies and procedures intended to protect whistleblowers from being victimised because they have disclosed a reportable concern.

The Whistleblowing Champion should have a level of authority and independence within the firm to access resources, including access to independent legal advice and training, and information sufficient to enable them to carry out that responsibility. They need not have a day-to-day operational role handling disclosures from whistleblowers.

The Whistleblowing Champion is Catherine Fry, and her contact details can be found at the end of this policy.

General Principles

We take the issue of malpractice, illegal acts, breaches of code of conduct and ethical issues very seriously and staff are able to raise their concerns in confidence.

Staff are encouraged to raise concerns at the earliest opportunity.

The firm's Code of Conduct (included in the Staff Handbook) provides guidance to all staff and helps staff to carry out their activities within appropriate ethical and legal standards. These obligations apply to relationships with service users, consultants, all business partners and between employees.

The whistleblowing policy is primarily for concerns which staff may have where the interests of others, the firm or both are at risk. If concerns relate to a personal grievance, or complaints relating to your own personal circumstances, such as the way you have been treated at work, the Grievance Policy should be followed. There are other policies and procedures designed to resolve other staff concerns. These policies and procedures are set out in the Staff Handbook. Similarly, the whistleblowing policy is not an appeal mechanism for other procedures, unless staff feel that the other process was compromised as a result of staff having raised concerns under this policy. If staff are uncertain whether something is within the scope of this policy, they should seek advice from the Whistleblowing Champion.

The firm will support individuals who raise genuine concerns under this policy. As a result of doing so, the individual will be protected from reprisal, victimisation, discrimination or any form of disciplinary sanction. Their continued employment,

opportunities for future training or promotion of the individual will not be prejudiced because they have raised a legitimate concern. However, providing information known to be untrue is potentially gross misconduct and may be subject to disciplinary action.

The firm recognises that there may be circumstances where an individual wishes to raise concerns confidentially or anonymously. Individuals may do so through the firm's independent whistleblowing provider, Safecall. Where concerns are raised anonymously, Safecall provides a secure mechanism through which follow-up questions and updates may be provided without revealing the individual's identity.

This policy is intended to reassure staff so that they have the confidence to raise a concern that they reasonably believe is in the public interest and is a means of improving standards. If a concern is raised anonymously, or if a person asks for their identity to be protected, the firm will not reveal it unless it is absolutely necessary in order to investigate and resolve the concern. This will be considered on a case-by-case basis and discussed with the individual concerned before disclosure is made. In some cases, there may be circumstances where the individual's identity may be made public. This could happen during legal proceedings, disciplinary or police investigations. In some cases, the firm may be forced to disclose the identity by a court order. The firm does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if the firm cannot obtain further information. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Champion and appropriate measures can then be taken to preserve confidentiality.

The firm will provide appropriate feedback to those that raise concerns to demonstrate that the concerns are being addressed and reassure those raising concerns that appropriate action has been taken.

Procedure

General Approach

In many cases concerns may be resolved between the individual and their performance manager. Staff are encouraged to report their concerns in the first instance, verbally or in writing, to their performance manager as soon as they become aware that the alleged act or omission is happening, or has happened, or is likely to happen.

Where the matter is more serious, or staff feel that their performance manager has not addressed their concern, or they prefer not to raise it with them for any reason, they should contact the Whistleblowing Champion.

It is important that any disclosures are reported promptly and as soon as reasonably practicable to allow the firm to investigate as quickly as possible.

The performance manager will acknowledge receipt, in writing, usually within 5 working days or as soon as reasonably practicable thereafter. They will usually arrange a meeting as soon as possible to discuss the concern. A colleague or union representative may accompany staff to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation. The purpose of the meeting will be to discuss the concern in more detail and discuss proposals for dealing with the matter.

All reasonable endeavours will be made to investigate any concerns raised. The firm will aim to keep staff updated as to the progress of any investigation and timescales. However, sometimes the need for confidentiality may prevent us giving the employee specific details of the investigation or any disciplinary action taken as a result. In any event, the investigator reserves the right to consult the Whistleblowing champion for guidance should it be appropriate to do so. Staff will treat any information about the investigation as confidential.

When raising a concern, it is helpful for staff to confirm how they think the matter might be best resolved.

In the event that staff are not satisfied with how the matter has been dealt with, the staff member may raise this with a more senior manager. The staff member must set out full reasons why they are dissatisfied in writing. The manager will keep the staff member updated on any further action taken.

Staff are encouraged to report any concerns internally in the first instance in accordance with this policy and to exhaust the internal procedure set out in this policy. There may, however, be circumstances where staff can properly report matters to outside bodies such as regulators or to the police and the law recognises that this may be appropriate in some cases. If so, staff must reasonably believe that the failure can be ascribed to the team or individual they are

reporting and that the wrongdoing falls within the team or person's remit, and that the information they disclose, and any allegations, are substantially true. It will very rarely, if ever, be appropriate to alert the media.

Protection and support for whistleblowers

The firm aims to encourage openness and will support staff that raise genuine concerns under this policy, even if they turn out to be mistaken.

The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. In our case, the Financial Conduct Authority ("FCA") is the prescribed person for concerns about the conduct of funds, markets, firms and individuals subject to FSMA (including banks, building societies, investment or insurance business) and about the operation of mutual societies that they register under the relevant legislation. Contact details for all the aforementioned are set out below.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats, harassment or other unfavourable treatment connected with raising a concern. If staff believe that they have suffered any such treatment, they should inform the Whistleblowing Champion immediately. If the matter is not remedied, they should raise it formally using the Grievance Procedure.

The firm has these procedures in place to ensure protection of whistleblowers' employment status.

Complaint of detriment or dismissal is made to an Employment Tribunal, and only an employment tribunal can decide after the event whether or not a disclosure was protected under PIDA, and whether it may result in compensation.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct may be subject to disciplinary action/other sanctions.

Independent Advice

If staff want free, confidential advice on what is protected by PIDA and how best to raise concerns, they can contact the independent charity Protect – 020 3117 2520 / www.protect-advice.org.uk. This includes advice on properly reporting a concern to an outside body.

How to blow the whistle

A worker who wishes to blow the whistle can do so either by contacting the Whistleblowing Champion, Catherine Fry, or if the disclosure is about that person, then any one of the Partners of the firm.

Contacting Safecall

Telephone: 0800 915 1571

Online Reporting Portal: www.safecall.co.uk/report

Contacting the Financial Conduct Authority

Whistleblowing contact line: 020 7066 9200

Email: whistle@fca.org.uk

Post: Intelligence Department (ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN

Website: <https://www.fca.org.uk/firms/whistleblowing>

Further information

See: <https://www.legislation.gov.uk/ukpga/1998/23/contents> to find the Public Interest Disclosure Act.