

# **Executive Summary of Policies**

September 2025



#### Introduction

This document provides a consolidated summary of Tritax Management LLP's ("TM LLP" or "the firm") internal policy content. While the full policy documents remain confidential due to proprietary and operational sensitivities, this summary outlines the key principles, commitments, and structures that guide TM LLP's operations. The purpose of this document is to provide a high-level overview of the firm's internal policies by disclosing material, non-sensitive information that reflects its approach to responsible and effective business practices.

## **Compliance Policies**

## **Information Security Policy**

TM LLP has internal policies on Information Security and Data Protection as well as Cybersecurity Incident Response Plans to ensure that business activities are carried out in a way that safeguards IT systems and protects data. TM LLP has a formal business continuity plan and contingency plans in place specifically for information security. In addition, incident response procedures have been implemented to provide a structured and systematic incident response process for all information security that affect any of firm's information technology (IT) systems, network, or data, including the firm's data held, or IT services provided by third-party vendors or other service providers. To maintain effectiveness, the information security coordinator shall coordinate exercises to test the incident response procedures periodically (at least once every 3 years).

## **Anti Bribery and Corruption & Anti Money Laundering Policy**

TM LLP has a zero-tolerance approach to bribery and corruption. Its policy sets out the general rules and principles to which the firm adheres and with which all staff must comply. It applies to the firm and to all divisions and subsidiaries of its group and extends to all business dealings and transactions, including all suppliers, in all countries in which it or its subsidiaries and associates operate.

Obstruction of justice: TM LLP strictly prohibits any action that constitutes obstruction of justice, particularly in the context of bribery and corruption.

Facilitation Payments: The firm explicitly prohibits the offering, promising, giving or acceptance of facilitation payments.

Money laundering: The firm is committed to preventing money laundering and to complying with all relevant anti-money laundering laws and regulations.

TM LLP has a separate Conflicts of Interest Policy. A conflict of interest arises when an individual's personal interests, or those of close relations or associates' conflict with the individual's professional duties to the company and its interests. The firm is committed to identifying potential conflicts of interest and minimising them in line with the principles set out in the Conflict of Interest Policy.

TMLLP has its own internal monitoring system used to detect bribery and corruption as well as due diligence procedures such as (e.g. screenings, risk assessments, compliance monitoring and structured approval processes and documentation).

The Compliance Officer has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. The MLRO has responsibility for the oversight of Bribery and Corruption.

## Gifts, Inducements and Entertainment Policy

TM LLP has a Gifts, Inducements and Entertainment Policy which outlines clear rules regarding gifts, and entertainment. Gifts and other benefits should only be offered or accepted where they are clearly reasonable in the circumstances. Examples of whether the gift and/or entertainment is appropriate is evident within policy.



## **People Policies**

## **Flexible Working Policy**

TM LLP has a Flexible Working Policy which recognises the benefits of a flexible workforce to allow employees to balance their commitments and interests outside of work, whilst enabling the effective operation of the business. All UK employees are eligible to make a request from the commencement of employment. Flexible working can incorporate a number of possible changes to working arrangements, including part-time working and home working. Part time working covers any arrangement where an employee is contracted to work anything less than typical full-time hours for the type of work in question. Home working is when an employee works from home for all or part of their hours with a computer and/or telecommunication link to the organisation.

## **Grievance Policy**

The Grievance Procedure enables an employee to raise concerns and seek resolution with regards to their working relationships, career and development and working environment. The firm's aim is to deal with grievances sensitively and with due respect for the privacy of the individuals involved. All employees must treat any information communicated to them in connection with a matter which is subject to this Grievance Policy as confidential. The firm provides internal reporting channels and escalation procedures for employees to raise grievances without the fear of retaliation.

## **Wellbeing Policy**

Tritax Management LLP is committed to the promotion of health and wellbeing in the workplace. The firm has measures in place to prevent mental health problems. Managers are encouraged to work with the Human Resources Department and Occupational Health if appropriate to provide support to staff suffering from stress. They should:

- Promote a culture of open communication and encouragement.
- Effectively plan and provide feedback on performance.
- Ensure that staff receive necessary training.
- Monitor workloads and reallocate work where necessary to avoid harmful levels of stress.
- Ensure that staff understand the standards of behaviour expected of them and others, and act on behaviour that falls below those standards.

TM LLP believes it is important to be open to staff raising concerns about stress and mental health issues, so that they can be resolved quickly, and the necessary support put in place.

## **Career Management, Learning & Development Policy**

TM LLP is committed to promoting a culture of continuous learning and career development for all employees. There is a framework in place to support employees to progress in their careers and ensures that individuals have clear opportunities for growth, continuous learning, and development within the organisation.

- Performance Evaluations:
  - Employees receive annual performance evaluations to review achievements, set objectives and identify development needs. As part of this process, Managers will also meet with their teams regularly throughout the year to informally discuss performance and progress.
- Educational Support:
  - TM LLP will provide financial support and study leave to employees and graduates to assist them in obtaining their professional accreditations as required
- Training:
  - Training programs are provided to all employees to help develop skills and knowledge needed for their current and future roles. Responsibility for this sits with the Head of People Development.
- Talent Pipeline Strategy:



TM LLP has an established approach to developing talent, focused on recognising and supporting employees to ensure they are ready to take on future roles within the company.

