

## WHISTLEBLOWING POLICY

### Policy statement

Tilstone Partners Ltd and Warehouse REIT plc are committed to conducting our businesses with honesty and integrity.

We require all staff to maintain high standards and compliance with statutory requirements, regulations and generally accepted forms of business conduct. Despite these expected standards of business conduct, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct.

We believe that a culture of openness and accountability is essential in order to prevent such situations occurring and we set out below how we intend to address them if they do take place.

The aims of this policy are:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated appropriately without recrimination and that their confidentiality will be respected;
- To provide staff with guidance as to how to raise those concerns; and
- To reassure staff that they may raise genuine concerns in good faith without fear of reprisals, even if their concerns turn out to be mistaken.

### What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or potential dangers at work. This may include:

- criminal activity;
- failure to comply with any legal or professional obligations or regulatory requirements;
- danger to health and safety;
- bribery;
- financial fraud or mismanagement;
- negligence;
- conduct likely to damage our reputation;
- unauthorised disclosure of confidential information;
- damage to the environment;
- breach of internal policies and procedures, including discriminatory practices, harassment, bullying behaviour and victimisation;
- the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern (even if it turns out to be unfounded) relating to any of the above. Any such concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) should be reported under this policy. However, this policy is not to be used for complaints relating to personal circumstances, such as the way staff members may have been treated at work. In those cases, the internal grievance procedure should be used or guidance followed in relation to harassment and bullying, as appropriate. Advice from a line manager or Human Resources is available on whether something is within the scope of this policy.

### Raising a whistleblowing concern

We hope that in most cases staff members will feel confident raising possible concerns with their line manager. They may be approached in person or in writing if that is preferred. As a first port of call, our line managers will aim to agree a way of resolving concerns quickly and effectively.

Where the matter is more serious, or if it is felt that a line manager has not properly addressed a concern, or the preference is not to raise it with them for any reason, the Human Resources Manager, Compliance Manager or a Director can be contacted.

If an issue cannot be raised with any of these resources, such as because it is of a particularly serious nature, or because there is a potential conflict of interest which may impact on the investigation, it may be raised directly with the Chair of Tilstone Partners Limited or Warehouse REIT plc.

#### What happens next?

A meeting (which will be recorded in writing) will be arranged as soon as possible to discuss the concern and to give an indication of how we would propose to deal with the matter. A colleague may be brought to such meetings to provide support, provided that the confidentiality of the disclosure and any subsequent investigation process is respected.

#### No reprisals and confidentiality

We hope that all our contacts feel able to voice whistleblowing concerns openly and without fear of reprisals. We are genuinely open to hearing concerns from our staff and commit to our promise that any instances of victimisation as a result of whistleblowing will be taken seriously and managed appropriately.

Additionally, if the staff member wishes the concern to be dealt with confidentially, we will make every effort to keep their identity secret.

If concerns remain about confidentiality, advice can be sought from PROTECT (<https://protect-advice.org.uk> or on 01244 893 776), the independent whistleblowing charity, which offers a confidential helpline.

#### External disclosures

The aim of this policy is to provide a mechanism for reporting, investigating and remedying any wrongdoing in the workplace.

However, the law recognises that in some circumstances it may be appropriate for concerns to be reported to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media, particularly given our confidentiality obligations to Warehouse REIT plc's clients. We strongly encourage seeking advice before reporting a concern to anyone external. PROTECT has a list of prescribed regulators for reporting certain types of concern.

Whistleblowing concerns usually relate to the conduct of our business, but they may sometimes relate to the actions of a third party, such as a client, supplier or service provider. The law allows a genuine concern to be raised with a third party, where there is reasonable belief that it relates mainly to their actions or something that is legally their responsibility. However, we encourage the reporting of such concerns internally first.

#### Investigation and outcome

If a concern is raised, we will conduct an initial assessment to determine the scope of any investigation. In some cases, we may appoint an investigator. The investigator may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep the staff member informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving specific details of the investigation or any disciplinary action taken as a result. Any information about the investigation will be treated as confidential.