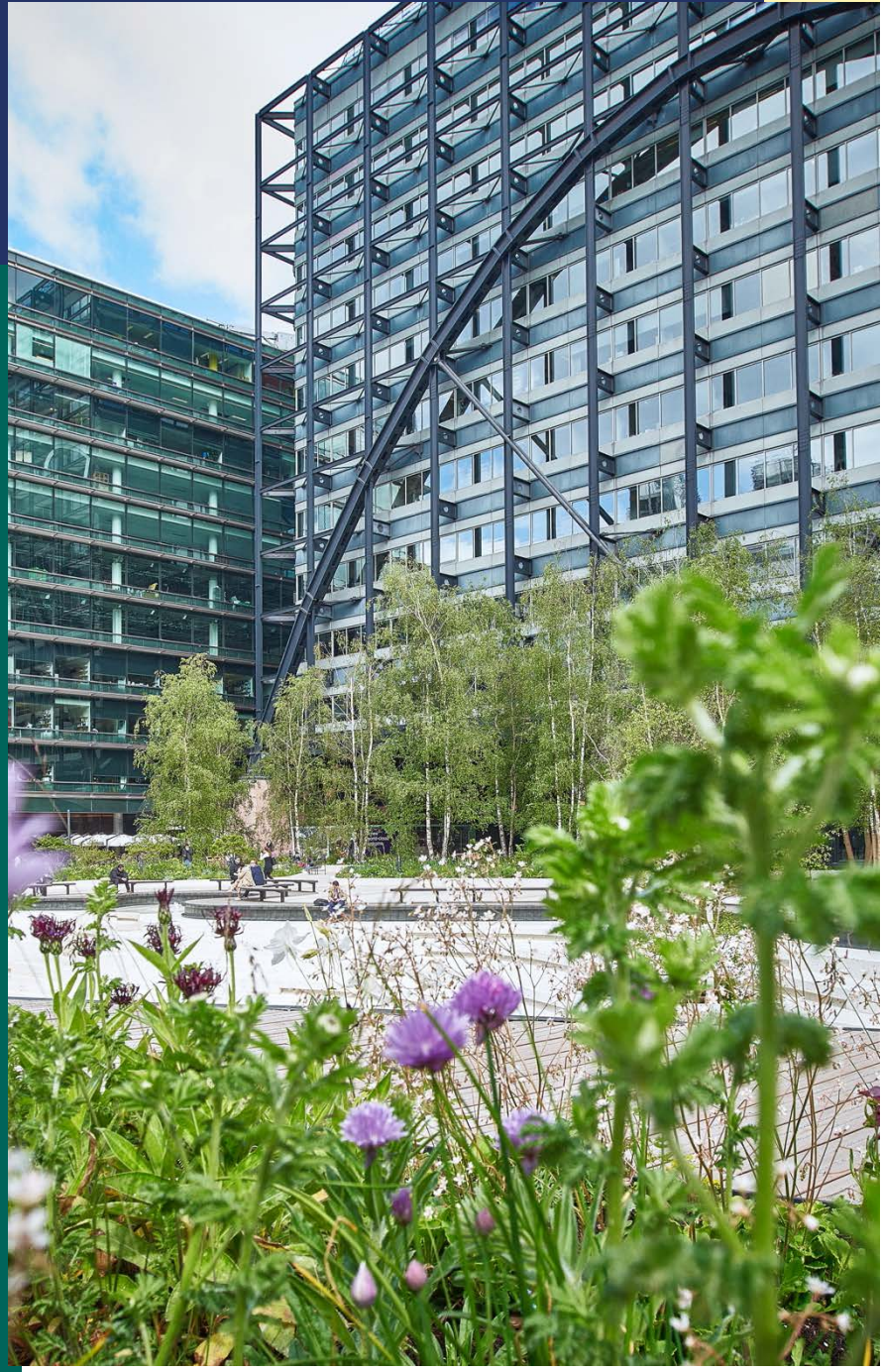


WHISTLEBLOWING POLICY AT BRITISH LAND



APPROVED BY:	AUDIT COMMITTEE
UPDATED:	19 MARCH 2024
OWNER:	GENERAL COUNSEL & COMPANY SECRETARY
TARGET AUDIENCE:	ALL EMPLOYEES

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WHISTLEBLOWING POLICY

Policy Statement

We expect all members of staff to act honestly and with integrity. We believe a culture of openness is essential and encourage members of staff to report any concerns about suspected wrongdoing.

Who is covered by this Policy?

This Policy is part of the British Land group's (the "Group") overall approach to corporate governance. All individuals working at all levels in the Group may raise concerns in accordance with this Policy, including senior managers, officers, directors, employees, consultants, trainees, home-workers, permanent and temporary staff, fixed-term and part-time staff, casual and agency staff and staff seconded to or by a third party (collectively referred to as "staff" in this Policy). In relation to staff seconded by a third party, any concerns relating to the activities/actions of any such third party, if relevant to the staff's secondment, can also be raised under the arrangements as described in this Policy.

What kind of concerns should I raise?

While the following is not an exhaustive list, matters which may be raised could include:

- Employees offering, taking or soliciting bribes
- Financial fraud or mismanagement
- Unauthorised disclosure of confidential information
- Criminal activity
- Miscarriage of justice
- Employees discarding damaging materials into the environment
- Failure to comply with legal or professional obligation or regulatory requirement
- Negligence
- Breach of our internal policies and procedures
- Conduct likely to damage our reputation; and/or
- The deliberate concealment of any of the matters listed above.

How should a member of staff raise a concern?

As soon as you become reasonably concerned you should first raise the issue with your line manager or, particularly if your line manager may be the potential transgressor, with either the Executive Committee member to whom you ultimately report, the General Counsel & Company Secretary, or the Chair of the Audit Committee.

If you are not comfortable with that route you should instead use the Group's whistleblowing service by:

- Telephone: 0800 988 6818
- Email: report@seehearspeakup.co.uk
- Website: www.seehearspeakup.co.uk/en/file-a-report accessing with username: Brland and password: Brl645

This is an independent and confidential telephone service operated by a third party called SeeHearSpeakUp. They have impartial staff that are trained to handle any reporting concerns. Concerns may be raised orally or in writing. Members of staff who wish to make a report should provide the following information:

- the background and history of the concern (giving relevant dates); and
- the reason why they are particularly concerned about the situation.

In the event of a suspected wrongdoing or danger, timely action may be critical depending on the nature of the wrongdoing or danger. Judgement should be applied as to the severity of the wrongdoing or danger, but you must not do any of the following:

- contact the suspected individual in an effort to determine facts or demand restitution; or
- discuss the case with anyone within or outside of the Group, other than the people listed above.

Any concern, problem or complaint relating to a member of staff's personal circumstances should be raised through the Group's grievance procedures.

How can others raise concerns?

Other business partners of the Group, including entities which supply goods and/or services to the Group, and occupiers of Group premises, should also make the Group aware of any concerns that they may have relating to the Group. Concerns from anyone other than staff should be reported to the General Counsel & Company Secretary at the following email address: whistleblowing@britishland.com

Alternatively, concerns can be reported via the Whistleblowing Form available at the following link: <https://www.britishland.com/contacts/head-office>. This can be done on an anonymous basis.

How will British Land respond?

Once you have raised a concern, we will look into it to assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation. If you have provided SeeHearSpeakUp with consent that your details may be passed to the General Counsel & Company Secretary, we will tell you who may be handling the matter, how you can contact them and whether your further assistance may be needed.

Where the Group considers it advisable, we will inform you of the outcome of any inquiry or investigation and any action which is proposed to be taken. You should treat any information about the investigation as confidential.

Should you be unhappy with the Group's inquiries or investigations of any matter disclosed by you under this procedure or with the action taken by the Group in respect of it, you may raise your concerns in writing with the General Counsel & Company Secretary, who will make such further investigations and take such further action as considered appropriate.

What safeguards are there for members of staff?

If you do raise a concern under this Policy, you will not be at risk of losing your job or suffering any form of retribution as a result, provided that:

- you reasonably believe that information, and any allegations contained in it, are substantially true; and
- you are not acting for personal gain.

Every effort will be made to ensure confidentiality as far as this is reasonably practical (and subject to any legal and/or regulatory requirements). If the situation arises where we are not able to resolve the concern without revealing your identity (for instance because your evidence is needed in court), we will discuss the difficulties with you and how best we can proceed.

Remember that if you do not tell us who you are, it will be much more difficult for us to investigate the matter, or to protect your position, or to give you feedback. In light of the assurances provided above that staff members will not be adversely treated as a result of reporting any concerns, we encourage all staff members to identify themselves when raising concerns under this Policy. However, we will always investigate anonymous reports. Help will be provided to you in order to minimise any difficulties which you may experience. This may include advice on giving evidence if needed. Meetings may, if necessary, be arranged off-site with you and with you being represented, if you so wish.

British Land will not tolerate any harassment, victimisation or detrimental treatment of whistleblowers (including informal pressures) and will take appropriate action to protect those who raise a genuine concern.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary, capability or redundancy procedures already taking place concerning the member of staff making the allegations.

Any allegation made maliciously which concerns information which you do not believe to be true or which is motivated by personal gain, may be treated as a disciplinary offence and will be dealt with via the Disciplinary Policy. Such allegations may result in disciplinary action being taken, up to and including summary dismissal. Failure to promptly and correctly follow the procedures set out in this Policy may also result in disciplinary action.

What safeguards are there for members of staff against whom a Whistleblowing allegation is raised?

If a Whistleblowing allegation is made against you, then you will be provided with the following support:

- you will be invited to an initial meeting between you and the person leading the Whistleblowing investigation within five working days of you being informed of the Whistleblowing allegation(s).
- this meeting invitation will be sent in writing, with no less than 48 hours' notice. The aim of the meeting will be to discuss the allegation(s) in detail including any evidence that has been submitted. It may be necessary for a follow up meeting to be scheduled with you once the investigating manager has interviewed other relevant members of staff.
- there will be a note-taker and / or a member of HR present at this meeting.
- you have the right to be accompanied by a fellow colleague or trade union representative.
- the Company will make every effort to rearrange this meeting within five working days of the original date, if you or your companion are unable to attend the meeting date given.
- the Company recognises such meetings can be difficult and you may request a break or adjournment if required.
- a written record of the meeting will be shared with you.

British Land recognises that any allegations may cause a level of stress and/or anxiety to you; alongside the safeguarding measure mentioned above, you also have access to support including the Employee Assistance Programme, the AXA healthcare, and the Doctor at Hand scheme.

Once the investigating manager is satisfied that the Whistleblowing investigation has been carried out as fully as possible, they will provide a written summary of their findings to HR clearly stating what elements of the allegation(s) have been upheld or not upheld. HR will then communicate the findings to you and any actions the Company intends to take moving forward.

Should the allegation(s) result in any disciplinary action against you, or any other colleague, the Company will make all possible efforts to conduct its Disciplinary process as quickly as practically possible and will aim to respond within 10 working days of the decision to implement the Disciplinary process.

This Policy may be amended from time to time.