DRAFT 1: 21 OCTOBER 2026

BATTERSEA REACH
RTM
COMPANY LIMITED

COMPLAINTS PROCEDURE

Approved by:
Date adopted:
Next review date:
Policy owner:

DRAFT 1: 21 OCTOBER 2026

1. Purpose

Battersea Reach RTM Company Limited (the **Company**) is committed to dealing seriously with all complaints made in good faith.

This procedure sets out how to make a complaint and how the Company shall treat it.

2. Scope

This procedure applies to:

- members of the Company;
- leaseholders at Battersea Reach; and
- shared owners at Battersea Reach.

For the avoidance of doubt, this policy does **NOT** apply to:

- employees of the Company (who should refer to their staff handbook and contract of employment for details on how to raise a grievance);
- persons renting apartments from leaseholders or shared owners (who should contact their landlord);
- guests, lodgers or immediate family members of leaseholders or shared owners;
- tenants or their families occupying social housing accommodation at Battersea Reach (who should contact their housing association);
- commercial tenants or leaseholders at Battersea Reach or their employees or customers;
- persons providing services to the Company or otherwise at Battersea Reach or their employees, customers and service providers; or
- shareholders of any body corporate, members of any partnership or trustees of any beneficiary which is a leaseholder at Battersea Reach;
- neighbours of Battersea Reach.

3. Process

Any person covered by this procedure who believes that they have experienced discrimination, harassment, victimisation, bullying or improper retaliation in connection with Company activities may raise a complaint.

Complaints should be submitted in writing to the Company Secretary.

Where the complaint concerns several directors or raises significant concerns about Board impartiality, the Company should consider obtaining independent professional advice or appointing an independent investigator.

The complaints procedure shall ordinarily involve:

Stage 1 – Acknowledgement

The Company should acknowledge a written complaint within five working days.

Stage 2 – Initial Assessment

The complaint shall be reviewed to identify the allegations, relevant evidence, any immediate risks and the appropriate process for investigation.

Stage 3 – Investigation

Where an investigation is required, it shall be conducted fairly and proportionately.

Relevant parties shall ordinarily be given a reasonable opportunity to provide their accounts.

Stage 4 – Determination

The Company shall consider the evidence and determine what action, if any, is appropriate.

Stage 5 – Written Response

The complainant should receive a written response explaining the outcome, subject to confidentiality and data protection requirements.

The Company should aim to conclude straightforward complaints within 20 working days, where reasonably practicable.

Where additional time is required, the complainant should be informed.

Stage 6 – Review

A complainant dissatisfied with the outcome may request a review within 15 working days.

Where practicable, the review shall be undertaken by persons who were not responsible for the original determination.

These timeframes are internal targets and do not override any applicable statutory or contractual requirements.

4. Independence and conflicts of interest

No director or other person shall investigate or determine a complaint in which they have a material personal interest.

Where a complaint concerns the conduct of a director, that director shall not participate in decisions concerning the handling or determination of the complaint, except where lawful and necessary for procedural fairness.

The Company's Conflict of Interest Policy shall apply.

Where appropriate, the Board may appoint an independent professional to investigate serious allegations.

5. Confidentiality and data protection

Complaints and investigations shall be handled with appropriate confidentiality.

Information shall be shared only where there is a legitimate need, including where necessary to investigate allegations, obtain advice, comply with legal obligations or ensure procedural fairness.

The Company shall comply with applicable data protection legislation.

Information concerning protected characteristics or other sensitive personal matters shall receive appropriate safeguards.

Confidentiality shall not be used to conceal unlawful conduct or prevent legitimate reporting to appropriate authorities.

6. Protection Against Retaliation

No director, employee or person acting on behalf of the Company may improperly penalise, threaten or disadvantage an individual because they have:

- raised a genuine complaint;
- reported suspected discrimination or harassment;
- provided evidence in an investigation;
- exercised statutory rights;
- challenged a management decision through legitimate procedures; or
- reported suspected misconduct.

Any allegation of retaliation shall be treated seriously and may be investigated separately from the original complaint.

7. False or malicious allegations

The Company recognises the importance of protecting individuals against deliberately false or malicious allegations.

Where clear evidence establishes that a person has knowingly made a materially false allegation with malicious intent, the Company may consider proportionate action within its lawful powers.

However, a complaint shall not be regarded as malicious merely because it is unsubstantiated, mistaken or unsuccessful.

No person shall be penalised simply for making a genuine complaint or raising a concern in good faith.

Any action must be consistent with applicable law, contractual rights and the Company's constitutional powers.

8. Confidentiality and data protection

Complaints and investigations shall be handled with appropriate confidentiality.

Information shall be shared only where there is a legitimate need, including where necessary to investigate allegations, obtain advice, comply with legal obligations or ensure procedural fairness.

The Company shall comply with applicable data protection legislation.

9. Monitoring and review

The Board shall periodically review the operation of this procedure.

The review may consider:

- complaints received;
- patterns of alleged unfair treatment;
- outcomes of investigations;
- identified weaknesses in procedures;
- recommendations for improvement; and
- relevant changes in legislation.

The policy shall be formally reviewed at least annually.

10. Relationship with other policies

This policy shall be read alongside the Company's:

- Conflict of Interests Policy;
- Anti-Bribery and Corruption Policy;
- Anti-Discrimination, Victimisation & Harassment Policy;
- Data Protection Policy; and
- Directors' Code of Conduct.

Where any provision conflicts with mandatory legal requirements, the applicable law shall prevail.

11. Review and amendment

The Board shall review this policy annually, or sooner where required by legislative changes, material changes in the Company's activities or identified governance concerns.

Amendments shall be approved by the Board and recorded in the minutes. Amendments so approved shall be posted to the Company’s website within five business days and be put to the next general meeting for further approval. Where such general meeting does not approve such amendments, they shall be deemed to be abrogated with effect from such meeting.

12. Adoption

This policy was approved by resolution of the Board of Directors of the Company on [] 2027.

This policy was further approved by the general meeting of the Company on [] 2027