DRAFT 1: 31 OCTOBER 2026

BATTERSEA REACH
RTM
COMPANY LIMITED

WHISTLEBLOWING POLICY

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

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1. Purpose

Battersea Reach RTM Company Limited (the **Company**) is committed to maintaining the highest standards of honesty, integrity, transparency and accountability in the management of the property and the conduct of its affairs.

The Company recognises the importance of encouraging individuals to raise genuine concerns about suspected wrongdoing, misconduct, unlawful activity or serious failures of governance without fear of retaliation.

This Whistleblowing Policy establishes a confidential and accessible procedure for reporting such concerns and ensuring that they are considered fairly, independently and appropriately.

The objectives of this Policy are to:

- encourage the early identification and reporting of suspected wrongdoing;
- provide clear and accessible reporting arrangements;
- protect individuals raising concerns from victimisation or retaliation;
- ensure concerns are investigated objectively and proportionately;
- promote responsible corporate governance and financial stewardship; and
- safeguard the interests of the Company, leaseholders, residents and other stakeholders.

2. Scope

This Policy applies to concerns raised by:

- directors and officers of the Company;
- employees of the Company;
- managing agents and their personnel;
- contractors, consultants and professional advisers; and
- other individuals working for or on behalf of the Company.

Leaseholders and shared owners may also raise concerns under this Policy. However, the statutory protections afforded to whistleblowers under employment legislation do not automatically extend to every Director, leaseholder, shared owner or contractor. Eligibility depends on the individual's legal status and the circumstances of the disclosure.

The Company will nevertheless seek to ensure that all genuine concerns are considered fairly and without improper retaliation.

3. Legal framework

This Policy is informed by applicable UK legislation, including:

- the Public Interest Disclosure Act 1998;
- the Employment Rights Act 1996, particularly the provisions relating to protected disclosures;

- the Companies Act 2006;
- the Bribery Act 2010; and
- the Data Protection Act 2018 and UK GDPR.

The Company recognises that qualifying persons may be legally protected when making disclosures that meet the statutory requirements.

Nothing in this Policy shall restrict an individual's right to make a protected disclosure to an appropriate external body or otherwise exercise statutory rights.

4. Matters that may be reported

Whistleblowing concerns may include reasonable suspicions of:

4.1 Financial misconduct

- Fraud, theft, embezzlement or misappropriation of funds.
- Improper use of service charge monies.
- Deliberate falsification of financial records.
- Undisclosed financial interests affecting procurement.
- Serious financial irregularities or misuse of Company assets.

4.2 Bribery and corruption

- Offering or accepting improper payments.
- Undisclosed commissions or inducements.
- Improper gifts or hospitality.
- Corrupt procurement or tendering practices.

4.3 Breaches of legal obligations

- Serious failures to comply with applicable legislation.
- Breaches of relevant building safety requirements.
- Unlawful handling of personal information.
- Deliberate breaches of statutory duties.

4.4 Health, safety and environmental concerns

- Serious building safety risks.
- Deliberate concealment of dangerous conditions.
- Failures to address significant fire safety concerns.
- Conduct creating risks to health, safety or the environment.

4.5 Corporate governance misconduct

- Deliberate concealment of material information from the Board.

- Serious abuse of authority.
- Dishonest manipulation of Board decisions.
- Deliberate falsification of minutes or Company records.
- Attempts to conceal conflicts of interest.
- Concealment or destruction of evidence of wrongdoing.

4.6 Other serious misconduct

- Criminal offences.
- Miscarriages of justice.
- Deliberate concealment of any of the matters described above.

A concern does not have to be proven before it is reported. However, individuals should have a reasonable basis for believing that the information they disclose indicates wrongdoing.

5. Distinction between whistleblowing and personal complaints

Whistleblowing generally concerns wrongdoing affecting others or the wider public interest.

Personal grievances, routine service complaints and individual disputes will ordinarily be addressed through the Company's (or the managing agent's) other procedures.

Examples include:

Matter	Normally appropriate procedure
Suspected fraud involving service charges	Whistleblowing
Alleged bribery in awarding a maintenance contract	Whistleblowing
Concealment of serious fire safety defects	Whistleblowing
Routine complaint about cleaning standards	Service Complaints Process
Disagreement about an individual service charge demand	Service Complaints Process
Personal disagreement between Directors	Directors' Code of Conduct
Alleged unlawful discrimination	Complaints Procedure

A matter may fall within more than one procedure. The Company shall consider its substance rather than relying solely on how the concern is labelled.

6. Principles of whistleblower protection

The Company is committed to the following principles.

6.1 No retaliation

No person should suffer improper adverse treatment because they have raised a genuine concern.

Retaliation may include intimidation, harassment, threats, exclusion, unfair treatment or other detrimental conduct.

6.2 Confidentiality

The identity of a person raising a concern shall be protected as far as reasonably practicable and lawful.

6.3 Fair treatment

All concerns shall be assessed objectively, without prejudging either the reporting individual or the person against whom allegations are made.

6.4 Independence

Individuals implicated in a concern must not control its investigation or outcome.

6.5 Accountability

The Company shall maintain appropriate records of concerns, investigations, decisions and remedial action.

6.6 Good faith and reasonable belief

Individuals are encouraged to raise concerns responsibly and honestly.

A person does not lose statutory whistleblowing protection merely because an allegation is ultimately unsubstantiated. Statutory protection does not generally depend on a disclosure being made in good faith, although bad faith may affect certain remedies.

7. Reporting a concern

Concerns should ordinarily be raised with the Company Secretary.

Where the concern involves several Directors, or there is a reasonable concern about the independence of the Board, the individual may approach an appropriate independent professional adviser or prescribed external authority.

Reports may be submitted in writing or verbally.

Where possible, a report should include:

- a description of the suspected wrongdoing;
- relevant dates and circumstances;
- the individuals or organisations involved;
- any supporting documentation;
- details of any immediate risks; and
- whether the matter has previously been raised.

Individuals are not expected to conduct their own investigations or obtain evidence through unlawful means.

8. Anonymous reports

The Company will consider anonymous disclosures wherever sufficient information is provided to assess the concern.

However, anonymity may limit the Company's ability to seek clarification, investigate fully or provide feedback.

Individuals are encouraged to identify themselves where they feel able to do so, with appropriate confidentiality safeguards.

Anonymous concerns must not be dismissed solely because the reporting individual's identity is unknown.

9. Acknowledgement and initial assessment

Where contact details are available, the Company should ordinarily acknowledge receipt of a whistleblowing concern within five working days.

The person receiving the report shall arrange an initial assessment to determine:

- the nature and seriousness of the allegation;
- whether immediate protective action is necessary;
- whether the concern falls within this Policy;
- whether any Director or other person has a conflict of interest;
- whether an independent investigation is required; and
- whether a matter should be referred to an external authority.

The five-working-day acknowledgement period is an internal target, not a statutory deadline.

10. Investigation procedure

Where an investigation is appropriate, the Company shall ensure that it is conducted fairly, promptly and proportionately.

The investigation may involve:

- reviewing relevant documents and financial records;
- interviewing individuals with relevant knowledge;
- obtaining information from managing agents or contractors;
- seeking independent legal, accounting or technical advice;
- reviewing contractual or regulatory obligations; and
- referring suspected criminal conduct to appropriate authorities.

The Board may appoint an independent investigator where the circumstances warrant it.

Any Director who is implicated in a concern must not participate in decisions concerning the handling or outcome of that allegation, except as permitted by law and necessary to ensure procedural fairness.

Investigations should be completed without unnecessary delay.

11. Confidentiality and data protection

Information relating to whistleblowing reports shall be handled confidentially and in accordance with applicable data protection legislation.

The Company shall:

- restrict access to information to persons with a legitimate need to know;
- store reports and investigation records securely;
- avoid unnecessary disclosure of identities;
- retain records only for as long as necessary; and
- ensure that personal information is processed lawfully.

Absolute confidentiality cannot be guaranteed where disclosure is required by law, necessary for a fair investigation or required by a competent authority.

Where practicable and lawful, the reporting individual should be informed before their identity is disclosed.

12. Protection against victimisation

The Company prohibits retaliation against individuals who raise genuine concerns under this Policy.

Examples of prohibited conduct include:

- threatening or intimidating a whistleblower;
- harassing or bullying a reporting individual;
- excluding a Director from legitimate Company business as punishment for raising concerns;
- improperly terminating contractual arrangements in retaliation;
- pressuring an individual to withdraw a report; and
- attempting to identify an anonymous whistleblower for retaliatory purposes.

Allegations of retaliation shall themselves be treated seriously and may be investigated separately.

The Company recognises that statutory remedies are available only where the relevant legal conditions are satisfied.

13. Reporting to external authorities

Nothing in this Policy requires individuals to report concerns internally before making a disclosure to an appropriate external authority.

Depending on the nature of the concern, relevant authorities may include:

- the Information Commissioner's Office for data protection matters;

- the Health and Safety Executive for matters within its jurisdiction;
- the police for suspected criminal conduct;
- the Serious Fraud Office for matters within its remit; and
- other relevant prescribed persons or regulators.

Individuals should ensure that any external disclosure is made through an appropriate lawful channel.

The Company shall not seek to prevent legally protected disclosures through confidentiality clauses or other arrangements.

14. Malicious or knowingly false allegations

The Company distinguishes between concerns raised on a reasonable basis that prove unfounded and allegations deliberately fabricated or knowingly made falsely.

No action shall be taken merely because an investigation does not substantiate a concern.

However, deliberately making false allegations with the intention of causing harm may constitute misconduct and may result in appropriate action, subject to applicable law and procedural safeguards.

15. Outcome and remedial action

Following an investigation, the Company shall consider whether corrective action is required. Depending on the findings, this may include:

- improvements to internal controls;
- changes to procurement or financial procedures;
- additional training or governance measures;
- contractual action against service providers;
- recovery of misappropriated funds;
- referral to external authorities; and
- action under the Company's Articles of Association and applicable law.

Where appropriate, the reporting individual should receive confirmation that the matter has been considered and, where permissible, a summary of the outcome.

Confidential personal or commercially sensitive information must not be disclosed unnecessarily.

16. Record keeping and board oversight

The Company shall maintain a confidential record of whistleblowing concerns and their handling.

Records should include:

- the date and nature of the report;
- the person responsible for handling the concern;

- initial risk assessments;
- investigation steps undertaken;
- findings and decisions;
- remedial actions; and
- closure date.

The Board should periodically review anonymised information about whistleblowing concerns to identify recurring risks or weaknesses in governance.

Individuals implicated in specific allegations should not receive confidential information about those allegations beyond what is lawful and necessary.

17. Relationship with other company policies

This Policy should be read alongside the Company's:

- the Directors' Code of Conduct;
- the Conflicts of Interest Policy;
- the Anti-Bribery and Corruption Policy;
- the Anti-Discrimination, Harassment and Victimisation Policy;
- the Data Protection and Privacy Policy;
- the Complaints Procedure; and
- the Financial Controls and Procurement Policy, where adopted.

Where a concern engages multiple policies, the Company shall coordinate its response appropriately.

18. Training and awareness

The Board shall ensure that Directors are made aware of this Policy and understand their responsibilities.

Managing agents and relevant service providers should also be informed of the Company's reporting arrangements.

The Company should make suitable information available to leaseholders and residents explaining how serious concerns may be reported.

19. 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 from the date of such meeting.

20. 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