

**Residential Secure Income plc**

**Whistleblowing Policy**

**Adopted originally by the Board on 19 November 2019 and most recently approved on 15  
September 2021**

## 1 Introduction

1.1 Residential Secure Income plc (**ReSI**), on its behalf and on behalf of its subsidiaries (the **Group**) is committed to tackling any malpractice within the organisation at all levels.

1.2 The aim of this Policy is to encourage every Board member of ReSI and all contractors (including the alternative investment fund manager (the **AIFM**) and suppliers to assist ReSI in tackling fraud, corruption and other malpractice within the organisation and in setting standards of ethical conduct.

1.3 The sorts of malpractice that we are concerned about include (but this list is not exhaustive):

1.3.1 fraud, money laundering, bribery or corruption;

1.3.2 irregularities involving accounting or other financial procedures;

1.3.3 commission of any criminal offence;

1.3.4 conduct which is or maybe in conflict with the organisation's interest such as involvement with a business competitor;

1.3.5 dishonesty or other irregularities in dealing with customers and suppliers;

1.3.6 conduct which endangers the health and safety of employees and others working for ReSI Housing.

1.4 This Policy applies to the Group, the Board, the directors of the Company's subsidiaries (it being noted that ReSI Housing Limited has its own equivalent policy, with which this Policy is aligned), and the AIFM, and extends to all business dealings and transactions in all countries in which the Group operate. This Policy also applies to third parties. A **third party** includes any individual or organisation you come into contact with during the course of your work for the Group, and includes actual and potential clients, customers, suppliers, contractors, distributors, business contacts, agents, advisors, joint venture and business partners, consultants and government and public bodies, including their advisors, representatives and officials, politicians and political parties, and any person or entity carrying out a service for the Group or working for or on behalf of the Group..

## 2 Your responsibilities

### 2.1 Reporting

2.1.1 If you are aware of or suspect that there may be any sort of malpractice occurring within the organisation, we strongly encourage you to inform a member of the Board.

2.1.2 It would not normally be appropriate to disclose your concerns outside the organisation or to a third party unless the procedures in this Policy have been followed first. If you are a worker engaged by the Group and you disregard these procedures, any disclosure to a third party may be in breach of your obligations of confidentiality, and you may not qualify for statutory protection under the Public Interest Disclosure Act 1998 (the **Act**).

## 2.2 Information

2.2.1 We will investigate all concerns that are raised, even if they are raised anonymously.

2.2.2 The more information that you can give us, the easier it is for us to progress our investigations. We will ensure that if you give your name, the person conducting the investigation will consider putting in place procedures to protect your identity. If you raise a concern on an anonymous basis, you should be aware that this may make it impossible for us to fully investigate your concerns.

## 3 Our responsibilities

### 3.1 The investigation

3.1.1 The Board member contacted will investigate the concern that you have raised. In appropriate cases, the person contacted may appoint others, for example the police or external lawyers or auditors, to investigate your concern. The nature of the investigation will depend on the nature of the problem you have raised, but in each case we will do the following:

- (a) take a detailed note of your concern and, if possible, talk to you if more details are needed;
- (b) investigate your concern;
- (c) respect your confidentiality as far as possible. If you do raise a concern, the person that you contact will take all reasonable steps to keep your identity confidential. However, in order to ensure that we can fully investigate your concern, it may not be possible to guarantee absolute confidentiality; and
- (d) give you feedback as to the conclusion of the investigation and, where possible, tell you what action, if any, has been taken

### 3.2 Your position

3.2.1 As part of our commitment to tackling malpractice and encouraging people to speak out, it should be recognised that anyone who either:

- (a) victimises or harasses someone as a result of that person genuinely raising a concern under this Policy.
- (b) deters or attempts to deter employees or others from genuinely raising concerns under this Policy,

may be subject to disciplinary action or a relevant contract may be terminated, ending their relationship with us.

### 3.3 Protection

3.3.1 If you genuinely believe that there is some form of malpractice occurring within or related to the Group and you raise a concern in accordance with this Policy, we will ensure that you do not suffer any disadvantage in the workplace as a result of speaking out about your concerns.

3.3.2 It may be that a concern that you have raised turns out to be unfounded when investigated. This does not mean that you should not have raised your concern in the first place and therefore will not affect our policy to ensure that you do not suffer a disadvantage as a result of raising your concern.

3.3.3 In certain circumstances, you may also be protected under the provisions of the Act.

3.3.4 If you raise a concern which you know to be false and/or raise a concern solely out of malice, then disciplinary action may be taken against you or a relevant contract may be terminated, ending your relationship with us.

3.4 Board members of ReSI are to be aware of the need to maintain high standards of conduct and probity and should not do anything as a Board member which could give rise to suspicion of impropriety or appearance of improper conduct.

#### 4 **Register of whistleblowing**

The Board shall keep a register, or shall procure that a register is kept, outlining any whistleblowing reported to the Board in the year. Such register shall, where possible, note the following items: (i) whistle-blower (with any request for anonymity), (ii) subject matter, (iii) ReSI's response, (iv) ReSI's proposed long-term solution and (v) any other matters considered relevant.

#### 5 **Review**

It is the ultimate responsibility of the Board to routinely refresh and to reinforce this Policy and its underlying principles and guidelines. This Policy, and the above-mentioned register, will be reviewed at least annually.