

## **Tritax Management Business Code of Conduct**

Tritax has an established track record for providing a professionally managed means of participating in both the UK and targeted overseas commercial property markets. We are committed to delivering excellent investment returns through both income and capital growth.

Our objective is to be one of the most respected and successful commercial property fund managers in the UK. We take an innovative and opportunistic approach to creating new commercial property investments, combining our in-house expertise with a wider network of trusted external specialists and joint venture partners.

Creating, building and maintaining trust requires strong and long-term commitment to high legal, ethical and moral standards throughout the entire business. This includes a 'zero-tolerance' approach to acts of bribery or corruption by any of our employees or business partners working on our behalf; as well as acts of modern slavery in our supply chain.

A sound and well-developed code of business ethics is a prerequisite of a successful business and is essential in order to maintain the strong reputation of Tritax and the confidence of its customers and business partners. Tritax is committed to maintaining an honest, open and well-intentioned culture.

Our commitment to business ethics is achieved in the following ways:

- Tritax prohibits the offering, giving, solicitation or acceptance of any bribe (whether in cash or otherwise) to or from any person or company (including public officials), wherever they are situated, by any individual or group, whether they be employees, agents or other persons or bodies acting on Tritax's behalf.
- We are committed to ensuring compliance with all relevant laws and regulations in countries where we operate.
- We are committed to robust and transparent corporate governance and we endeavour to meet the highest standards expected of our sector.
- We are committed to respecting human rights. This includes respecting human rights as expressed in the UN Declaration of Human Rights (UDHR) and the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work.
- We seek to compete with other companies in a vigorous and lawful manner, but we do not seek to damage the reputation of competitors, nor do we attempt to acquire information regarding a competitor's business by unlawful means and we will not permit such behaviour by any of our employees or associates.
- We expect our employees and associates to adhere to our company values and policies as outlined in the Employee Handbook.
- As a regulated firm, we have a gifts & entertainment policy which reflects the expectations of our regulator. A register is kept of gifts and entertainment and this is reviewed by Compliance.
- The Company will provide or facilitate training where appropriate so that employees and associates can readily recognise what constitutes bribery or other corrupt practices by themselves or others and can avoid them.

### **Tritax Management LLP**

3rd Floor, 6 Duke Street St James's, London SW1Y 6BN  
T: +44 (0)20 7290 1616 E: [enquiries@tritax.co.uk](mailto:enquiries@tritax.co.uk) [www.tritax.co.uk](http://www.tritax.co.uk)

- Our core business activities constantly involve us interacting with the public sector in many forms and, in particular, with Local Authorities of all political persuasions. As a matter of policy, we do not contribute to political parties.
- Facilitation payments are not permitted. Facilitation payments are defined as payments demanded by officials (or others) simply to secure or expedite the performance of their normal duties (for example, granting a licence, allowing goods to cross a border, and so on). These are commonplace in some jurisdictions, but the making of such payments, regardless of how small, is an offence under the Bribery Act 2010.
- We do not tolerate fraudulent practices among our employees and associates or a behaviour in which deception is used to obtain a business advantage. The Disciplinary Policy sets out definitions of and the process for dealing with gross misconduct.
- We have a Whistleblowing Policy in place to ensure that our employees and associates know who to contact should they suspect any form of qualifying disclosures of, as defined by the Public Interest Disclosure Act 1998. Employees and associates are encouraged to speak out and will be protected from detriment or criticism if a disclosure is made in good faith. Employees are able to submit details of their concerns through an independent, dedicated telephone line, which is stated in the Whistleblowing Policy.
- We take appropriate action to eradicate any form of improper practice which is brought to our notice.
- Employees are governed by the Market Abuse Regulation (MAR) in dealings in the shares of Tritax. None of our employees or associates may use any information that they receive in the course of their business dealings for personal gain. Sanctions for violations include prison sentences and unlimited fines. Training is provided to employees.
- Breaches of Tritax's 'zero-tolerance' approach towards acts of bribery and corruption by business partners acting on its behalf will lead to a review of Tritax's contracts and relationship with such partners.
- Persons Discharging Managerial Responsibilities (PDMRs), as defined in MAR, must disclose any personal or family interests in relation to the Group's business and avoid any undertakings in which there is a conflict of interest.
- We do not disclose confidential information about suppliers or occupiers, and our employees and associates should not do so.

The Partners of Tritax are responsible for this policy and for its day to day operation.

*Henry Franklin*

COO, Partner

Tritax Management LLP, February 2020