



Speak Up Policy





SPEAK UP POLICY

At Landsec, we are committed to conducting business with integrity and fairness, with respect for the law and our values. We encourage an open, supportive and safe working environment where individuals feel able to speak up and raise their concerns.

Any concern raised through the procedure outlined below will be treated seriously and investigated appropriately by Landsec.

Who can use this policy?

This policy is designed to encourage our employees at all levels including contractors¹ (referred to as "Staff"), our suppliers and occupiers/tenants of our premises to raise concerns or report any suspected wrongdoing.

What kind of concerns are covered by this policy?

You should use this policy if you are genuinely, with fair reason, concerned about any business activities of Landsec or its employees.

Examples of concerns that can be raised by using this policy are:

- danger to the health and safety of any employee or any other individual;
- threat or actual damage to the environment;
- commission or likely commission of a criminal offence, including financial impropriety, solicitation, giving or receiving of bribes, slavery, fraud;
- failure to comply with a legal obligation or regulatory requirements;
- miscarriage of justice;
- interference in the proper judicial process (for example, intentional destruction of evidence in proceedings involving the company); or
- deliberate concealment of any of the matters listed above .

How can you raise concerns?

As soon as you become reasonably concerned, you can raise the issue by calling the NAVEX Global Hotline on **0800 0903 653**. This is a 24/7, anonymous, free to call and confidential service provided by NAVEX Global. NAVEX Global is an independent organisation with impartial staff who will handle your call. Alternatively, you can make a report via the NAVEX Global website landsec.ethicspoint.com. Reports using the Navex service can be made anonymously.

Alternatively, you may also raise your concern with Landsec's Company Secretary, Director of Risk and Assurance, Group Compliance Lead, or a member of the Executive Leadership Team. While this will not be on an anonymous basis, the reporter's identity will be kept confidential (to the extent possible).

¹ Covers those contractors who have a contract or other arrangement with Landsec to do work or services personally for financial payment.

Policy owner: Group Compliance Lead

ELT sponsor: CFO

Last updated: August 2022

What happens after you report your concern?

If you decide to report your concern via Navex, your report will be routed back to Landsec for further handling.

All raised concerns will be appropriately investigated. The identity of the reporter will, to the extent possible, be kept confidential. We will endeavour to provide suitable feedback to the individual who has raised concerns.

Staff who raise concerns, with a reasonable belief of wrongdoing, that turn out to be unfounded will not be penalised for being genuinely mistaken. Any employee who victimises Staff who has spoken up (in reasonable belief about the wrongdoing) may be subject to Landsec's disciplinary procedures.

What is not covered

This policy is not designed

- for use in relation to personal grievances or complaints regarding Staff terms of employment, discrimination or harassment. Staff should refer to Landsec's Grievance or Bullying and Harassment Policy (as applicable) to raise such matters. These policies are available on Landsec's internal SharePoint.
- to report events presenting an immediate threat to life or property.

Contact

If you have any questions about this policy, please contact the Director of Risk and Assurance or the Group Compliance Lead.