

# SUPR

## WHISTLEBLOWING POLICY

### Introduction

Supermarket Income REIT plc ("the Company") is a Real Estate Investment Trust investing in a diversified portfolio of supermarket real estate assets in the UK and Europe. The Company's assets earn long-dated, secure, inflation-linked, growing income. The Company targets a progressive dividend and the potential for capital appreciation over the longer term. As long-term investors, the Company is committed to embedding sustainability across its business.

The Company committed to conducting its business with honesty and integrity, and all staff are expected to maintain high standards. We believe a culture of openness and accountability is essential and employees are encouraged to report any concerns about suspected wrongdoing.

The purpose of this Whistleblowing Policy ("the Policy") is:

1. To encourage individuals to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected
2. To provide guidance as to how to raise any concerns
3. To reassure individuals that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken

### Scope

This Policy applies to the Group and all persons working at all levels in the Group may raise concerns in accordance with this Policy, including officers, directors, employees, consultants, trainees, permanent and temporary staff, full-time and part-time staff, casual and agency staff, external consultants and third-party representatives (a "Person").

### Requirements

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or misconduct. This may include:

- a) criminal activity
- b) failure to comply with any legal or regulatory requirements
- c) miscarriages of justice
- d) danger to health and safety
- e) damage to the environment
- f) bribery under our **Anti-corruption and Bribery Policy**;
- g) facilitating tax evasion
- h) financial fraud or mismanagement
- i) breach of our internal policies and procedures including the conduct rules
- j) conduct likely to damage our reputation
- k) unauthorised disclosure or misuse of confidential information
- l) the deliberate concealment of any of the above matters

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this Policy.

This Policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should speak with HR.

## **Raising a concern**

We hope that in many cases you will be able to raise any concerns with your line manager or key contact person at the Company. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to a member of the executive committee.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- a) The Chair
- b) The Company Secretary, or
- c) The Independent Audit Partner for the Company

Contact details are provided in Appendix 1 below.

It is your right to remain anonymous when reporting, but we may not be able to take the claim further if you have not provided all the information needed. You must say straight away if you do not want anyone else to know it was you who raised the concern.

Where you do not wish to remain anonymous, we will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or employment representation to any meetings under this Policy. Your representative must respect the confidentiality of your disclosure and any subsequent investigation.

## **Confidentiality**

We hope that individuals will feel able to voice whistleblowing concerns openly under this Policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage employees to make disclosures anonymously. Proper investigation may be more difficult or even impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the other contact points listed below and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are set out in this Policy.

## **Investigation and outcomes**

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will take down a written summary of your concern and provide you with a copy after the meeting (where applicable). We will also aim to give you an indication of how we propose to deal with the matter and inform you of actions taken. Sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

The Group cannot guarantee that it will respond to all concerns in the way the individuals might wish, but the Group can guarantee that it will try to handle all concerns raised fairly and properly.

## **External disclosures**

The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body, their contact details can be found in Appendix 1. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern publicly. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

## **Protection and support**

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support those who raise genuine concerns under this Policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment because of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chair immediately.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you will be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

## **Review of this Policy**

The Board has overall responsibility for this Policy and will review this, at least annually, to ensure its effectiveness.

**Signed by Nick Hewson on behalf of the Board of  
Supermarket Income REIT PLC  
24 November 2025**

## APPENDIX 1 – CONTACTS

Position	Contact information
Chair	Nick Hewson <a href="mailto:Chair@suprplc.com">Chair@suprplc.com</a>
Company Secretary	SGH Company Secretaries Limited <a href="mailto:co-sec@shma.co.uk">co-sec@shma.co.uk</a>
Independent Audit Partner, BDO	Charles Ellis <a href="mailto:Charles.Ellis@bdo.co.uk">Charles.Ellis@bdo.co.uk</a>
Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 E-mail: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a> Website: <a href="http://www.pcaw.co.uk">www.pcaw.co.uk</a>