

Residential Secure Income plc

Whistleblowing Policy
(the “**Policy**”)

As confirmed by the Board on 22 September 2025

1 Introduction

- 1.1 Residential Secure Income plc ("**ReSI**" or the "**Company**"), 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. It is also to encourage staff 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; to provide staff with guidance as to how to raise those concerns; and to reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.3 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. The sorts of wrongdoing and 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;
 - 1.3.7 damage to the environment; and
 - 1.3.8 the deliberate concealment of any of the above matters.
- 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), 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 You will be able to raise any concerns with the Chairman, who will arrange a meeting with you as soon as possible to discuss your concern. You may bring a legal representative to any meetings under this policy. Your legal representative must respect the confidentiality of your disclosure and any subsequent investigation.
- 2.1.2 To the extent that your concern is in relation to the Chairman, you should contact the Company's Senior Independent Director instead.
- 2.1.3 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.
- 2.1.4 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. The Company strongly encourages you to seek advice before reporting a concern to anyone external.

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.
- 2.2.3 The Company hopes that all persons to which this policy applies will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, the Company will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

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.

3.1.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Chairman or the Senior Independent Director (as applicable).

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; or
- (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 legislation.

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.

- 3.3.5 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.
- 3.3.6 However, if the Company concludes that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

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) whistleblower (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.