



Whistleblowing Policy

2026

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LondonMetric Property Plc (“LondonMetric” or the “Company”) is committed to conducting its business with honesty and integrity and fostering a culture of transparency and accountability.

As part of this commitment, the Company expects high standards to be maintained, and employees, contractors, suppliers, and other stakeholders are encouraged to report suspected wrongdoing or unethical conduct within the organisation to prevent such situations and to ensure they are addressed when they do occur.

LondonMetric aims to ensure that effective, accessible, and trusted whistleblowing mechanisms are available to all individuals across our operations and value chain. This

includes employees, contractors, and workers within our supply chain, recognising that early identification of concerns is vital to preventing harm and upholding high standards of corporate governance.

The primary objective of this policy is to establish a mechanism for reporting concerns or suspicions of wrongdoing and to ensure that such reports are handled effectively, confidentially, and without fear of retaliation.

There may be other appropriate routes for some issues, such as employee grievance procedures, but the procedures set out here can be used to blow the whistle after any alternative routes have been exhausted or where they are deemed inappropriate.

1. The Company owns a non-core theme park asset located in Germany.

1. Scope

This policy applies to the Company and all of its subsidiaries.

It applies to all employees (full-time, part-time, temporary). It covers our direct business activities and extends to our relationships with third parties, joint ventures, and investment partners.

LondonMetric expects all contractors, suppliers, consultants, and any third parties acting on its behalf, as well as all stakeholders involved in its operations and projects, to uphold this policy and maintain appropriate whistleblowing arrangements for their activities. We are committed to ensuring that whistleblowing channels are accessible to all relevant stakeholders, including site-based workers and those engaged through third parties. Where appropriate, and recognising the tenant control nature of our lease structures, we will work with managing agents, contractors and suppliers to promote awareness of reporting channels and remove barriers to access.

2. Whistleblowing

Whistleblowing is the reporting of information relating to suspected wrongdoing or dangers arising from our activities. Examples include, but are not limited to:

- criminal activity;
- miscarriage of justice;
- danger to health and safety;
- sexual harassment or other unlawful harassment, including where such conduct has occurred, is occurring, or is reasonably believed to be likely to occur, whether by employees or by third parties in connection with the Company's activities;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- corruption and bribery;
- financial fraud or mismanagement;
- negligence;
- breach of internal policies or procedures;
- conduct likely to damage the Company's reputation;
- unauthorised disclosure of confidential information; or
- the deliberate concealment of any of the above matters.

A "whistleblower" is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the Company's activities (a "whistleblowing concern") you should report it under this policy.

A concern relating to sexual harassment may constitute a whistleblowing concern under this policy, even where the individual raising it is personally affected. Individuals are not required to characterise concerns in legal terms, and a disclosure will not fall outside this policy solely because it relates to their own working environment or treatment.

3. Reporting Procedures

Internal

We hope that in many cases our employees will be able to raise concerns with their line manager. 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.

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 may speak in confidence with any of the following to discuss your concerns:

- The Company's Chief Executive,
- The Company Secretary and Financial Conduct Authority ('FCA') Compliance Officer, or
- The Company's current designated workforce engagement Non-Executive Director.

Concerns relating to sexual harassment may be raised through the whistleblowing channels set out in this policy. These channels are available where individuals do not feel able to raise concerns through management or other informal routes.

You may bring a colleague to any meeting under this policy, but they must respect the confidentiality of your disclosure and any subsequent investigation.

External

As we require all stakeholders, organisations and individuals we work with to implement their own whistleblowing reporting procedures, we expect external parties to be able to raise their concerns through these channels.

Should any third party in our supply chain feel that their concerns are not being addressed, please reach out to Jadzia Duzniak, the Company Secretary and FCA Compliance Officer, via jadzia.duzniak@londonmetric.com. The same principles of anonymity, confidentiality, and non-relation as set out below will be followed.

Independent Reporting Channel

While LondonMetric does not currently operate an independent third-party whistleblowing hotline, individuals may raise concerns directly with the Company or, where appropriate, with relevant prescribed bodies, including the Financial Conduct Authority (FCA), as LondonMetric is subject to FCA regulations.

These channels allow individuals to raise concerns confidentially and, where permitted by law, anonymously. Details of how to raise concerns are made available on our website and through internal communications. Individuals are encouraged, where appropriate, to raise concerns internally in the first instance. However, concerns may also be raised directly with the relevant prescribed bodies where appropriate.

LondonMetric will keep its whistleblowing arrangements under review and will consider enhancements to further strengthen accessibility and independence over time.

4. Anonymity and Confidentiality

Reports made under this policy will be treated confidentially to the extent possible, while still allowing for a thorough investigation. The identity of the whistleblower will be protected to the fullest extent possible by law. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

LondonMetric recognises that concerns may be raised by individuals who feel vulnerable or at risk. We are committed to ensuring that reporting channels are accessible and safe to use, including for individuals who may not have direct access to corporate systems.

We recognise the importance of anonymous reporting and anonymous reports will also be investigated to the extent possible. Anonymous reports can be sent to the Company's registered office at 1 Curzon Street, London, W1J 5HB, marked for the attention of the Company Secretary.

Concerns regarding FCA-regulated activity can also be raised with the FCA at:

Intelligence Department (Ref PIDA)
Financial Conduct Authority
12 Endeavour Square
London E20 1JN

T: 020 7676 9200

E: whistle@fca.org.uk

Please note that external bodies such as the FCA may not be able to guarantee confidentiality in all circumstances.

5. Non-Retaliation

LondonMetric is committed to protecting whistleblowers from any form of retaliation or victimisation arising from their report, provided the report was made in good faith and without malicious intent. This protection applies to employees as well as contractors, suppliers, and individuals within our value chain. Retaliation may include dismissal, disciplinary action, harassment, threats, or any other unfavourable treatment. Retaliation against individuals who make genuine reports under this policy will not be tolerated and may result in disciplinary action, including dismissal or termination of commercial relationships.

6. Investigation Protocol

When whistleblowing concerns are discussed at a meeting, we will prepare a written summary and provide you with a copy after the meeting.

All reports received under this policy will be promptly and thoroughly investigated and we will aim to give you an indication of how we propose to deal with the matter. The investigation will be conducted

impartially and fairly. Whistleblowers may be contacted for further information or clarification during the investigation process. Investigations will be conducted independently of the business area concerned and, where appropriate, may involve external advisors to ensure objectivity and fairness.

Appropriate action will be taken based on the investigation's findings. Where investigations identify that individuals have been adversely impacted, LondonMetric will seek to ensure appropriate remediation and support, taking into account the nature of the concern and those affected.

Failure by a manager or relevant individual to appropriately escalate or respond to a disclosure in line with this policy may also result in disciplinary action, including dismissal.

Conversely, any deliberate misuse of this policy, including knowingly making a false allegation or raising a concern in bad faith, may result in disciplinary action.

Stakeholders, organisations, and individuals with whom we work might see the relationship terminated if they breach this protocol or fail to follow procedures in their activities.

7. Communication and Feedback

The Compliance Officer will be responsible for providing updates to the whistleblower and, if required, the Board on the progress and outcome of the investigation, while maintaining confidentiality.

LondonMetric will monitor the number, nature and outcome of whistleblowing reports. Aggregated data and key themes will be reported to the Audit Committee to support oversight of risks, trends and the effectiveness of this policy.

To comply with applicable laws and regulations, the Compliance Officer will, where required, report matters to the FCA and engage with regulators in an open and cooperative manner.

8. Training and Awareness

LondonMetric conducts training and awareness sessions for staff on this whistleblowing policy, emphasising the importance of reporting concerns to maintain a transparent and ethical work environment, as well as the protections available to whistleblowers. Training includes guidance on recognising potential human rights, environmental, and ethical risks, as well as on how to raise concerns safely and effectively.

Training is provided on induction and refreshed periodically, with enhanced training for managers and those responsible for handling disclosures. Records of training completion are maintained.

Contractors, suppliers, consultants, and any third parties acting on behalf of LondonMetric, as well as stakeholders involved in our operations and projects, are required to ensure that their employees and supply chain receive relevant training.

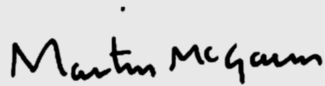
9. Monitoring and reviews

This policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws and regulations. The effectiveness of this policy and associated procedures will be periodically reviewed, including consideration of feedback, usage levels and evolving best practice. Where

appropriate, LondonMetric will disclose relevant information on whistleblowing activity in its Responsible Business reporting.

This policy is overseen by our Audit Committee, which ensures this policy is regularly reviewed. We will publish any relevant updates in our annual Responsible Business Report.

Approved and signed on behalf of the Board by the Chief Financial Officer



Name: Martin McGann

Chief Financial Officer

Date: 12 May 2026
Date:

Effective from May 2026