



Big Yellow Group
Whistleblowing Policy

Document Ref:	BYG-GOV-004: Whistleblowing Policy
Version:	004
Dated:	28/09/2026
Document Author:	J Verrills
Document Owner:	People Manager
Document Approver:	Head of People, Talent and Development

General information

Purpose of document	
Document Whistleblowing mechanism within the Company.	
Review frequency	
Annual	
Definition and interpretation	
Please explain any acronyms and terms here that feature in the document	

Revision History

Version	Date	Revision Author	Summary of Changes
001	01/11/2021	C Hathaway	Upload of Document
002	01/04/2025	O McGonagle	Contact details of third party amended
003	16/04/2026	O McGonagle	Contact details of Company contacts amended
004	28/09/2026	J Verrills	Policy opened to contractors, suppliers, customers and the public. EthicsPoint web address added. Wording updated for Non-Executive Director contacts. Moved to standard template.

Distribution and links

Applies to	Whole Company
Corporate Website	https://corporate.bigyellow.co.uk/sustainability/governance-and-policies
Intranet	People & Talent - Documents - EMPLOYEE HANDBOOKS - All Documents
Related documents	Employee Handbooks

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Background

Big Yellow Group PLC (BYG, consisting of Big Yellow Self Storage and Armadillo Self Storage, and hereafter referred to as 'the Company') is a FTSE250 listed Real Estate Company providing self storage services to business and domestic users throughout the UK.

Commitment

The Company is committed to integrity and the highest level of ethical behaviour and to creating an environment of trust which is open, safe and secure. We are proud of the working environment in the Company and wish to maintain our stores, Maidenhead and Bagshot as enjoyable and safe places to work.

It is important that all employees and anyone working in the Company feel able to raise concerns about suspected wrongdoing, without fear of suffering detriment or being victimised. An illustrative list of violations that should be reported can be found at Appendix 1.

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice, and employees may often be the first to realise that such situations have occurred. The Company has a duty to identify any malpractice within the organisation and will take appropriate measures to remedy the situation. The Company encourages a culture of openness, where an employee is able to raise issues which concern them at work.

With the introduction of the Public Interest Disclosure Act 1998, an employee has legal protection from any form of retribution, victimisation or detriment, as a result of publicly disclosing certain serious allegations of malpractice. This Policy aims to explain how to report any wrongdoing at work, including any form of harassment, which an employee believes has occurred or is likely to occur, without detriment to them and how the Company will then proceed.

The Policy is designed to afford protection to an employee if they disclose information in a specified category to a specified individual in specified circumstances, in accordance with the Public Interest Disclosure Act. It will also enable the employee, if necessary, to make a complaint or assist in an investigation without fear of reprisal. All concerns raised under the policy will be treated confidentially.

This policy, and the Navex Global / EthicsPoint reporting channel, is also open to contractors, suppliers, customers and members of the public who wish to raise a concern about the Company's conduct.

Whilst an employee is encouraged to raise concerns within the Company, provision has been made for disclosures to an independent body, where the employee believes that raising an issue within the Company would be inappropriate or has been unsuccessful.

The Policy will apply in cases where an employee genuinely believes that a violation is occurring, has occurred or may occur within the Company.

Scope

Reporting a Concern

If an employee suspects that there has been a violation of any law, or Company policy and procedures, they should report it promptly. An illustrative list of violations that should be reported can be found at Appendix 1.

When reporting suspected violations, an employee may identify themselves or choose to remain anonymous. Company Policy expressly prohibits any retaliation against anyone who reports a suspected violation.

While it is not necessary that the employee proves the malpractice or misconduct that they are alleging, but may simply raise a reasonable suspicion, they will not be protected from the consequences of making such a disclosure if, by doing so, they commit a criminal offence.

To report a suspected violation, please use one of the following:

Raising A Disclosure Internally

If an employee prefers to talk to someone internally, please contact one of the following:

- Their Manager
- Head of People, Talent and Development
- Head of Store Compliance and Communications
- Chief Financial Officer
- Chief Executive Officer
- Head of Operations Company Secretary
- Head of IT and Digital Security and Telephony

Independent Non-Executive Directors

If the employee does not wish to discuss the matter with any of the above, then they may also speak to either of the two independent Non-Executive Directors in the Company

The Chair of the Company's Audit Committee

Circumstances where it may be appropriate to raise a concern directly with the Audit Committee Chair may include material fraud or financial irregularities.

Workforce Engagement Non-Executive Director

Acts as an alternative non-executive contact to whom employees can report confidential matters and raise concerns under the Company's Whistleblowing Policy.

Raising a Disclosure To An Independent Body

If an employee feels that they cannot raise their concerns internally, nor to the independent Non-Executive Directors, and they honestly and reasonably believe the information and any allegations are true, they should raise the matter with Navex Global, a third-party company who specialise in this area, who provide dedicated trained staff who will listen to their concern.

The contact details of Navex Global can be found on the intranet or [weblink](#). The employee can raise their concern via their web portal by using the 'Click here to Connect' link.

Navex Global (also branded as EthicsPoint) can be contacted at the following address:

bigyellow.ethicspoint.com

Anonymity can be granted to the employee if they wish whilst raising their concerns. The concerns will be reported to appropriate designated senior managers within the business who will then investigate the issue and report back via the Navex Global web portal.

The employee may be unsure as to whether to report a matter, or they may require advice on the right course of action or how to interpret / apply laws, Company Policies or Procedures. In these circumstances, they are encouraged to seek advice from any of those on the Internal Reporting list above.

IF IN DOUBT, ASK!

Company Response

The Company will determine the appropriate form of investigation for the nature of the allegation raised. Where appropriate, the matters reported may be:

- Investigated by management;
- Referred to Store Compliance;
- Referred to the police.

The Company will endeavor to keep the employee informed of progress and the outcome of any investigation into a reported allegation. The intention to keep the employee informed will necessarily be subject to the constraints of data protection legislation and due consideration of confidentiality.

Employees are encouraged to raise any concern/s that they may have as soon as possible, in order that a matter may be addressed at the earliest opportunity.

An employee may be accompanied by a work colleague at any meeting relating to their concern, providing that the colleague is not in any way connected with the issue.

All complaints will be viewed seriously and treated confidentially, and appropriate steps will be taken to ensure that the employee's working environment and / or working relationships are not prejudiced by their disclosure.

The Company recognises that in some cases, the employee may be concerned about confidentiality and may choose to raise a concern in confidence. In such cases their identity will be protected and will not be disclosed without their consent. If a situation subsequently arises where the Company is unable to deal with a concern without revealing the employee's identity, their Manager or the Head of People, Talent and Development will discuss with them as to how or whether to proceed.

Whilst an employee may choose to raise a concern anonymously, they must be aware that this may lead to difficulties in conducting an effective investigation into the concern.

Subject to the circumstances in which the employee raises their concern, their Manager, the Head of People, Talent and Development or an appropriate manager will conduct an investigation into the complaint which may involve interviewing the person against whom the allegations are made, the employee and any relevant witnesses. Any such interviews will be conducted in the strictest confidence.

The Manager or Head of People, Talent and Development will keep a detailed written record of the investigations and will communicate with the employee about the process and when it has concluded. If the employee is dissatisfied with the outcome of the investigation, or the way in which the disclosure was handled, they may request that the complaint is reconsidered. Any such request should be made, in writing to the Head of People, Talent and Development, within five (5) working days, of receiving their decision. If the employee does not however feel able to put their concern/s in writing, they should meet with the Head of People, Talent and Development to discuss the details. If they cannot discuss the concern with the Head of People, Talent and Development, then they should contact the Workforce Engagement Non-Executive Director.

Once the investigation has been completed, the Manager who has conducted it will decide, on the strength of the findings, the appropriate action to be taken, which may include disciplinary action. In such cases the employee may be required to attend a disciplinary or investigative hearing as a witness. Any disciplinary action will be conducted in accordance with the Company Disciplinary Policy to reflect the severity of the offence and may include dismissal.

[Abuse of Policy](#)

Employees should be aware that the Policy will apply where a disclosure is made in good faith and where they reasonably believe that the information disclosed and any allegation contained in it are substantially true. If any disclosure is made in bad faith (for instance, in order to cause disruption within the Company), or concerns information which the employee does not substantially believe is true, or indeed if the disclosure is made for personal gain, then disciplinary action may be taken, which may include dismissal.

Appendix 1

Examples of Violations Which Should be Reported

The following is a list of examples of violations which should be reported. This is an illustrative list and is not intended to be a comprehensive list of all possible violations.

Fraud and Losses

- Auditing, accounting or internal control improprieties (e.g. falsification of a financial record);
- Any loss or discrepancy (e.g. petty cash or stock losses) where fraud or theft cannot be ruled out (for low value losses, please consider reporting this locally);
- Any incident believed to be part of an organised series of criminal activity;
- Timekeeping, pay related or Travel and Expenses fraud;
- Theft of any Company asset;
- Thefts of Company information;
- Misappropriation;
- Significant misrepresentation;
- Manipulation of sales, accounting, price or customer data that could result in incorrect financial disclosure;
- Falsification of business records;
- Collusion between Company employees or other stakeholders to create fraudulent payments;
- Any known fraud regardless of the value of the estimated loss.

Bribery, Corruption and Insider Trading

- Bribery;
- Kickbacks;
- Insider trading or similar activities using information not publicly available;
- Bid rigging or overcharges by suppliers or the knowing approval by Company employees of overcharges.

Working with Suppliers, Customers and Competitors

- Violations of competition and anti-trust laws that relate to Competitors or Customers;
- Kickbacks, pay-offs, blackmail, preferential treatment;
- Payments to or agreements with suppliers without obtaining appropriate approval;
- Improper issuance of payments or other benefits to suppliers or other parties.

Conflicts of Interest, Gifts and Entertainment

- Conflicts of Interest where there is a personal gain or benefit or that of a family member that has not declared;
- Gifts and favours in contravention of the Gifts and Entertainment Policy;
- Inappropriate entertainment on Company property or at Company events;
- Inappropriate entertainment with suppliers, customers or any other business contact.

Use of Company Assets and Protecting Data

- Inappropriate sharing of confidential Company or Company stakeholder information;
- Sharing bid prices or other confidential bid information with inappropriate parties;
- Improper use or theft of customer or employee data;
- Blocking access to or delaying response time of Company systems;
- Unauthorised access to Company computer hardware / software or internet connections;

- Actions that result in the theft of Company data;
- Use of computer resources to run a private business;
- Use of Company computer resources that may be inappropriate or offensive to others;
- Suspected loss or unauthorised disclosure of personally identifiable information, or Company information, including the loss or theft of an electronic device, or if the security or confidentiality of the information appears to have been compromised;
- Destruction or falsification of records that relate to pending investigations or litigation.

Security, Quality or Safety Concern

- Non-reporting of any safety concern;
- Systematic disregard of safety or security requirements;
- A substantial issue regarding employee safety or security;
- The health and safety of any individual has been, is being or is likely to be endangered.

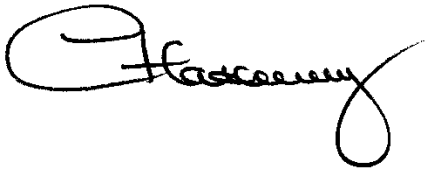
Communications, Public and Political Interaction

- Advertising, marketing material and promotions that do not comply with Company Policy, applicable laws or regulations;
- Contracting or entering into discussions with regulators, legislators and government bodies, public interest groups, journalists, industry associations or political figures without appropriate consent;
- Any political payments to any candidate or political party or persons working on their behalf;
- Activities resulting in the improper reporting of the Company's financial condition.

Other Non-Compliance and Company Policy Violations

- Improper disposal or sale of Company property;
- Possession of illegal / illicit drugs or selling such items while on company business;
- Working under the influence of alcohol or illegal / illicit drugs;
- Discrimination, Bullying, Harassment, including Sexual Harassment and abuse in the working environment;
- Non-compliance with any other Company Policies or Procedures;
- Any criminal offence has been committed, is being committed or is likely to be committed;
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject;
- A miscarriage of justice has occurred, is occurring or is likely to occur;
- The environment has been, is being or is likely to be damaged;
- Information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

Sign off

	
C Hathaway Head of People, Talent & Development	28/09/26