

Knight Frank Global Whistleblowing Policy

Purpose

This policy aims to provide the following:

- To enable everyone to feel confident that they can raise a serious concern;
- To provide appropriate avenues to raise those concerns and receive feedback on any action taken;
- To provide a response to concerns and ensure that they are aware of how to pursue them if they are not satisfied;
- To reassure them that they will be protected from possible reprisals or victimisation if they have reasonable belief that they have made a disclosure in good faith.

This policy is intended to address certain types of concerns and encourage their reporting. Speaking broadly, this includes concerns which are, or reasonably believed to be, in the public interest. This may include criminal offences, breaches of legal obligations, or concerns regarding ethical conduct, bribery, fraud and corruption. The Whistleblowing Policy and Hotline are not appropriate for reporting concerns around personal grievances, performance management and pay issues or similar.

Why it matters

Knight Frank is committed to the highest standards of probity and accountability, and therefore we expect our employees, customers and suppliers to be able to raise any serious concerns. This Policy outlines Knight Frank's approach to whistleblowing, including when it should and should not be used. It also sets out that staff will be free from recrimination should legitimate concerns be raised, and that Management have a responsibility to act on whistleblowing reports.

Scope

This policy applies to all staff employed by Knight Frank. It applies also to consultants, contractors and agency staff in relation to their work for, or on behalf of, Knight Frank.

Knight Frank refers to the Knight Frank global network and/or one or more of its member firms, each of which is a separate legal entity. The Knight Frank global network comprises Knight Frank LLP, its subsidiaries (direct or otherwise), its affiliates and any other entity or practice carrying on business under or including the name Knight Frank or in association with Knight Frank LLP internationally in over 50 territories.

Failure to comply with this policy may result in disciplinary action being taken against any staff involved, or the termination of contracts with contractors and other third parties working for Knight Frank.

The Knight Frank global network can use the Knight Frank name and resources of the network. Member firms agree to abide by certain common policies and to maintain the standards of Knight Frank.

General Principles

- Management have a responsibility to investigate any reports of wrong-doing. Deliberate inaction in investigating reported or known issues will not be tolerated and may be subject to disciplinary action.
- This policy makes it clear that anyone can raise a protected concern without fear of victimisation, subsequent discrimination or disadvantage.
- This policy is intended to encourage and enable individuals to raise serious concerns, and where appropriate, provide Knight Frank the opportunity to address these concerns internally.

- Each entity is responsible for ensuring they have adequate supporting policies and procedures to comply with local legislation or regulation. Should you believe local requirements conflict with this policy, then please contact the UK Risk and Compliance team.

Providing Support

Knight Frank is committed to supporting anyone who raises a concern as part of this policy. We recognise that it may be a very difficult decision, but those who raise concerns are protected from detrimental treatment that occurs because of the disclosure they have made. Further information is provided below, but this Policy aims to protect an individual's identity whether they chose to report confidentially or anonymously. Whilst we would encourage individuals to be able to raise concerns openly, it is understood that many may have concerns about doing so and may wish to be anonymous. There may be circumstances where an anonymous allegation limits the ability of Knight Frank to investigate and act on the report. But wherever reasonably possible, confidentiality and anonymity will be accommodated.

False allegations

Knowingly false or vexatious allegations made for whatever reason will be treated very seriously and may lead to disciplinary action.

Contracts of employment, non-disclosure agreements and confidentiality agreements

Management has a responsibility to ensure contracts of employment, non-disclosure agreements and confidentiality agreements cannot prevent workers from reporting suspected wrongdoing they have witnessed.

The Reporting Procedure

Raising a concern

Initially, it would normally be expected that a concern would be raised with an immediate manager. This will depend on the seriousness or the sensitivity of the issues involved, and who is suspected of malpractice. If it is believed that an immediate manager is not the appropriate person to raise the concern with, then it should be escalated to someone in a senior position who would be able to provide the appropriate support, discussed with a Human Resources representative or raised via the confidential whistleblowing hotline.

A concern may be raised either verbally or in writing in the first instance; however during the course of the investigations a written statement may be requested, including as a minimum the background of the concern with relevant dates or a clear explanation as to why it was believed to be necessary to make a report, including outlining why there is reasonable grounds for concern.

If it is believed that disclosing directly to a Knight Frank employee is not possible, then you may escalate it anonymously through a dedicated, confidential whistleblowing hotline. The Freephone hotline is available 24 hours a day, 7 days a week, and is manned by Navex Global (EthicsPoint) personnel, who are completely independent of Knight Frank. The information that is provided to EthicsPoint will initially be passed on to one of Knight Frank's managers in the Human Resources and Risk departments in the UK who will act on it without compromising the individual making the report in any way.

Reporting via EthicsPoint means a concern can be raised in confidence knowing that the report will not be traced or recorded. EthicsPoint provides the individual making the report with a unique code number to make it easy for them to phone back with more information if they wish.

While reporting anonymously is an option, there are numerous advantages of a named report being received. Where a name is provided, Knight Frank can contact the individual to arrange an initial meeting or call to discuss the allegations in more detail. Where appropriate to do so, the individual will be updated on the progress of the investigation without having to contact EthicsPoint.

The EthicsPoint hotline and web reporting tool details are in Appendix B of this policy.

How Knight Frank will respond

- Depending on the nature of the concern raised, including whether or not it has been raised anonymously, a meeting may be convened to understand the concerns further. Further meetings may be necessary during the course of the investigations, if required.
- After the meeting, Knight Frank will, as far as is appropriate to do so, keep the individual informed as to how the investigations proceed. This may also require that the concern is raised via an appropriate local procedure, but this will be reviewed on a case-by-case basis.
- If they wish to make an allegation after their employment with Knight Frank has ended, Knight Frank will review the handling of this on a case-by-case basis.
- Where it is appropriate, the concerns raised could be:
 - Investigated by management, or through the disciplinary process;
 - Referred to the police or other law enforcement body;
 - Referred to an external auditor;
 - Form the subject of either an independent, or regulatory enquiry.

Policy Implementation

This policy is to be adhered to by all entities part of the Knight Frank Global Network. This policy will be made available to the Knight Frank Global Network via the Knight Frank website and other applicable platforms.

Monitoring and Review

This policy will be reviewed in line with all other global policies at least annually. If there is a business or legislative reason for it to be reviewed more frequently, then this will be conducted by the UK Best Practice team.

Knight Frank Global Whistleblowing Policy

Prepared: April 2025
Exec Sponsor: William Beardmore-Gray
Position: Senior Partner and Chairman
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Appendix A: Scope definitions extract from Knight Frank's Global Governance Policy

The **Knight Frank Group** includes:

- All entities which are **subsidiaries** and governance, and control is enforced via a majority shareholding *greater than 50%*. A subsidiary is an entity that is controlled by the parent.
- UK registered **limited liability partnerships** whereby a direct Knight Frank LLP subsidiary is named as a designated member.
- **Associates** are entities which Knight Frank LLP or an immediate subsidiary has significant influence, but not control over the operating entity. Significant influence is governed by a shareholders agreement, between 20%-50% equity investment is held.
- **Equity investments** are entities which Knight Frank LLP or an immediate subsidiary has neither significant influence nor control over the operating entity. This is usually where the shareholding *is less than 20%*. However, significant influence/control may be demonstrated through a shareholders agreement.

The **Knight Frank Global Network** includes:

- The Knight Frank Group
- Licensee holders, are entities that no equity or minority equity is held, governed through a brand licence agreement. Licensee holders can be utilising the Knight Frank name as follows: trading as, co-branded or in partnership.

Appendix B: Ethics Point Hotline details

As stated in the Knight Frank Global Anti-Bribery and Corruption Policy, Knight Frank is committed to the highest standards of probity and accountability as regards anti-bribery, corruption and ethical conduct. The following Hotline details are an extract of the Knight Frank Global Whistleblowing Policy. Please ensure that you read the Policy before making use of the Hotline.

This policy is specifically for concerns around ethical conduct, including bribery, fraud and corruption. The Whistleblowing Policy and Hotline are not appropriate for reporting concerns around personal grievances, performance management and pay issues or similar.

The Freephone hotline is available 24 hours a day, 7 days a week, and is manned by personnel completely independent of Knight Frank.

The provider of the EthicsPoint hotline, Navex Global, is a completely independent organisation with impartial staff to handle these types of calls. This means a concern can be raised in confidence knowing that the report will not be traced or recorded. The information that is provided to EthicsPoint will initially be passed on to one of Knight Frank's managers in the Human Resources and Operations and Risk departments in the UK who will act on it without compromising the individual making the report in any way. EthicsPoint provides the individual making the report with a unique code number to make it easy for them to phone back with more information if they wish.

The EthicsPoint hotline and web reporting tool details follow.

International Freephone Numbers

Country	Freephone Number
Australia	1800 719 627
Belgium	0800 74 490
Botswana	00269 800 7861 010
China	400 120 8502
Cyprus	80 077141
Czech Republic	800 144 482

Fiji Islands	8002630
France	0 805 98 78 85
Hong Kong	800 963 761
Hungary	(80) 088 298
India	000 800 0502 228
Indonesia	0800 1503054
Ireland	1800 903 137
Kenya	0800 211 179
Korea, Republic of South	00798142030154
Malawi	Web Only
Malaysia	1 800 81 9814
New Zealand	0800 823 501
Nigeria	708 060 1512
Philippines	1800 1 322 0308
Poland	800000146
Romania	0800 360 191
Russia	8 800 301 37 86
Saudi Arabia	800 850 0748
Singapore	800 852 8054
South Africa	080 098 3514
Spain	900 999 375
Switzerland	0800 896 996
Taiwan	00801 49 1209
Tanzania	Web Only
Thailand	1 800 012 242
Uganda	0800 113381
United Arab Emirates	800 0320702
United Kingdom & Northern Ireland	0800 069 8024
Zambia	Web Only
Zimbabwe	(503) 530-7081

United Kingdom

In the UK only, the Hotline number represents a Whistleblowing and Respect helpline. For further details of what that means for reporting in the UK, please see the Respect, Diversity and Inclusion pages on Global Life.

If you require a Freephone number where none is available

Where there is no Freephone number, the collect call/reverse charge number steps are as follows:

1. Caller dials their country operator
2. Asks for an international collect call or reverse charge to: 0044 1249 661 808
3. Operator will dial the number and speak to an EthicsPoint Operator who will accept the call and charges
4. Country operator connects caller to EthicsPoint, leaves the call and then the call takes place as normal

Making a report via the web

Go to <https://knightfrank.ethicspoint.com>

Follow the navigation to submit a report and take a note of your reference number.