

Sustainability Policy

Our Sustainability and Social Responsibility (SSR) policy sets out our approach to corporate citizenship. For Brightbay this means understanding and actively managing the social and environmental risks and opportunities that can impact on our income growth and net asset value, whilst also taking account of our responsibilities towards stakeholders, in particular our investors and shareholders, our employees, the businesses we work with and communities in which we operate.

Sustainability and Social Responsibility (SSR) Policy Document

Brightbay Real Estate Partners Limited. ("Brightbay") is a UK REIT managing a diversified property portfolio located primarily in the United Kingdom. We believe that sustainable income growth is a key driver of capital value growth and in making investments we seek to allocate capital to assets in sectors expected to provide the best risk-adjusted returns.

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We have developed a strategic framework which enables us to effectively manage ESG issues. This framework is based on three key activity areas – Governance, Investment and Assets – each of which is linked to a shortlist of key material social and environmental risks and opportunities that we have identified for our business.

We believe that an active approach to managing material issues across these three areas supports our business strategy. We seek to ensure that our internal governance and risk management, investment strategy and our assets are resilient to the changing economic, social and environmental landscape.

Strategic SSR Framework



Resilient governance

To uphold the highest standards of ethical behaviour and support our workforce. We seek to operate in a manner that fosters open stakeholder engagement and demonstrates best practice in social and environmental risk management.

Resilient investment

We undertake to realise the full potential of our investments for both our shareholders and the communities in which we operate.

Resilient assets

We are mindful of our wider role as placemakers and we aim to contribute to the long term prosperity of the communities in which we invest. In doing so, we will undertake asset management which minimises risk and maximises asset value whilst providing the best experience possible for occupiers and visitors alike.

Sustainability Policy continued

SSR Objectives

We have set overarching SSR objectives for each activity area. These objectives capture our ambitions as a business and the opportunities for us to minimise risk and create value for our shareholders.

Resilient Governance

Objective 1: We will uphold the highest standards of ethical behaviour and actively support our workforce.

We will achieve this by:

- Promoting staff training and development with a particular focus on fostering innovation.
- Treating all employees, prospective employees, agents, contractors, tenants, and suppliers fairly and equally, regardless of their gender, age, race, sexuality or disability.
- Seeking to diversify our workforce to reflect the nature of the Company's operations or the community in which we operate, whilst maintaining our responsibility to select the best candidate.
- Ensure no applicant is discriminated against either directly or indirectly.
- Recognising our social and moral duty to offer opportunities to people with disabilities and doing all that is practicable to meet this responsibility.
- Upholding our commitments under our Code of Ethics; promoting our Whistleblowing Policy and taking appropriate action in any instances of unethical behaviour.
- Recognise, respect and uphold all UK employment rights and human rights.

Objective 2: We seek to operate in a manner that fosters open stakeholder engagement and demonstrates best practice in social and environmental risk management.

We will achieve this by:

- Complying with all applicable regulation and preparing for anticipated future regulation, and its implications.
- Disclosing our management of social and environmental risks and opportunities to stakeholders through participation in industry benchmarks and by including relevant information on our website.
- Ensuring all employees receive an appropriate level of training on social and environmental issues.
- Maintaining good practice in H&S management to the benefit of tenants, contractors, customers and employees.
- Operating a robust data management system to ensure our disclosure and reporting is accurate.
- Foster a culture of openness.

Resilient Investment

Objective 3: We undertake to realise the full potential of our investments for both our Shareholders and the communities in which we operate throughout the investment life cycle.

We will achieve this by:

- Identifying investment risks during acquisition due diligence and identifying opportunities to add value.
- Highlighting the positive social and environmental performance of our assets.
- Monitoring and measuring our resource consumption to identify efficiencies, particularly with respect to energy, while reducing our carbon footprint and operational costs for our tenants.

Resilient Assets

Objective 4: We will undertake asset management which maximises net asset value whilst providing the best experience possible for occupiers and visitors alike.

We will achieve this by:

- Engaging with and contributing to charity and community initiatives on an ongoing basis.
- Engaging with local authorities and supporting their community campaigns.
- Collaborating with tenants to conceive and promote our own community projects.
- Understanding, enhancing and promoting our role as place-makers, with a focus on creating and maintaining prosperous communities in the local areas where we invest.
- Ensure key environmental and social risks are managed when the Group is undertaking development activities and throughout the management of our portfolio.
- Engage with tenants to better respond to their needs and position ourselves to anticipate future requirements.

Governance of our SSR Policy

Responsibility for the implementation of our SSR strategy sits with our SSR Committee. We will use targets and carefully selected KPIs to measure our implementation progress, with various individuals within the business responsible for the day-to-day management of those targets. The SSR Policy will be reviewed every two years to ensure it responds to the evolving landscape of social and environmental risks and opportunities.

Stephen Oakenfull

Chair of the Sustainability and Social Responsibility Committee