



Political donations policy

Why do we have this policy?

Goodman does not make Political Donations (monetary or otherwise) and is committed to conducting business with integrity.

Definitions:

A **Political Donation** for the purposes of this policy is a gift made to, or for the benefit of political party, an elected member, candidate or group of candidates or person or entity who may use the donation to make another political donation.

Specific examples of Political Donations are:

- + A donation of money
- + A non-monetary gift
- + The provision of a service at no charge, or at a discounted rate

- + A subscription paid to a political party for membership or affiliation
- + A disposition of property.

It does not include contributions, duties or taxes made in accordance with the law.

Who does the policy apply to?

This policy applies to all directors, team members (whether permanent, temporary, contractors or secondees). It may be extended to suppliers with whom we are working with under contractual obligations.

What does this policy cover?

This policy sets out the common principles and minimum standards in relation to political donations and bribery and corruption.

Prohibition on Political Donations

Goodman does not make any political donations as defined above.

Political Attendances

In certain circumstances, Goodman may pay for team members to attend a political meeting, event or fundraising function organised by political parties or political candidates. Goodman team members may attend where lawful and there is corporate benefit for Goodman in attending. Team members must seek approval from the relevant Regional CEO before attending a political event.

Prohibition on Bribery

Goodman strictly prohibits any activity that seeks to bribe, corrupt or otherwise improperly influence a Government official or representatives in any country including political parties and political candidates.

Gifts and Entertainment

Goodman has a gifts+entertainment policy which outlines that gifts and entertainment should only be given to Government officials and representatives where lawful and in compliance with all governmental codes, consistent with local customs, and where approved by the relevant Regional CEO. Gifts and entertainment must not be excessive in value or likely to be perceived as an intent to bribe.

Any donations to charities will be assessed by and made only through the Goodman Foundation.

Personal Capacity

Team members are free to engage in any lawful political activity outside of their work at Goodman but need to be mindful of the reputational implications of any such activity. It must be clear that any political involvement or donation is in their personal capacity.

Governance

Goodman is committed to complying with the laws and practices in relation to political donations and bribery and corruption. This policy should be read in conjunction with Goodman's other core policies including the Code of Conduct. This policy is available on the Goodman website and Intranet, the 'Greenroom'. This policy is covered as part of training for team members.

This policy has been approved by the Risk and Compliance Committee and is effective from February 2020. Goodman undertakes to review this policy including its effectiveness every two years or earlier in response to any significant regulatory developments.

