



### Why do we have this policy?

Goodman is committed to conducting its business in accordance with our values and a culture of integrity, compliance and ethical behaviour. This Policy is designed to encourage the reporting of any unethical, unlawful or improper behaviour (“Improper Conduct”). This Policy outlines the way in which Goodman will address reports of Improper Conduct and will protect Disclosers who raise concerns of misconduct in relation to Goodman, its officers or employees where they had reasonable grounds to suspect Improper Conduct.

### Definitions

- + **Improper Conduct** for the purposes of this Policy means:
  - + Conduct which is dishonest, fraudulent, corrupt, illegal or unethical;
  - + A breach of Goodman’s Code of Conduct or another Goodman policy (including but not limited to Dealing with Public Officials, Securities Trading, Workplace Bullying and Harassment, and Conflicts of Interest policies);
  - + An unsafe work practice; or
  - + Any other conduct that is of concern and may cause loss to Goodman or may damage Goodman’s reputation or interests.
- + **Discloser** for the purposes of this Policy includes a current or former officer, employee, supplier, employee of a supplier, associate or any relatives or dependants of these individuals, customers, capital partners or Government officials.
- + **Recipient** for the purposes of this Policy is an officer or senior manager of Goodman (the Group or regional CEO or Group or regional Legal, Risk or HR Executive).

### What does this policy cover?

This Policy sets out the common principles and minimum standards for the reporting and investigation of Improper Conduct. This Policy sets out Goodman’s commitment to ethical conduct and addressing any concerns or instances of Improper Conduct by setting out Goodman’s approach to protecting those who report Improper Conduct from any reprisal or disadvantage.

#### Ethical Concerns Policy

Policy Owner: Group Legal and Risk

Effective Date: June 2019

Key Contact: Group Head of Legal & Company Secretary and Chief Risk Officer

## How do we apply this policy?

### Raising concerns

Employees are encouraged to raise any concerns of Improper Conduct to the regional CEO or regional Legal, Risk or HR Executive in the first instance. Employees can also report the conduct to the Group Legal, Risk or HR Executive. External parties can also report any concerns of Improper Conduct to these people.

Employees and external parties can also raise any concerns to Goodman, via the Contact us+ form on the Goodman website, which can be made anonymously. Concerns can also be emailed to [ethicalconcerns@goodman.com](mailto:ethicalconcerns@goodman.com).

### Protection for those who report Improper Conduct

Goodman is committed to protecting persons who disclose Improper Conduct under this Policy, including the identity of the person. Goodman also encourages reporting by those who may have been involved in the Improper Conduct and this disclosure will be taken into account in the context of any response or disciplinary action.

It is important that the concerns raised are genuine and not based on hearsay, gossip or rumour. Alleging improper behaviour on the part of another person can be damaging to that person and others so it is important that any allegations can be supported with facts. Goodman can take disciplinary action against an employee who makes a disclosure without reasonable grounds to suspect the Improper Conduct.

Where Improper Conduct is disclosed in accordance with this Policy and where the Discloser had reasonable grounds to suspect the Improper Conduct, Goodman will take all reasonable steps to prohibit reprisal or disadvantage such as dismissal, demotion, victimisation, discrimination, harassment, physical or psychological harm or current or future bias.

If an Employee reports improper Conduct in accordance with this Policy and feels that they or anyone else has been disadvantaged as a result, they should contact the regional CEO or regional Legal, Risk or HR Executive. External parties are also encouraged to report any reprisal or disadvantage.

For employees, it is noted that in some countries work-related grievances in relation to matters such as an interpersonal conflict, termination of employment or disciplinary action may only be a protected disclosure where it concerns alleged victimisation.

### Initiating Reports

Where the regional CEO or the regional Legal, Risk or HR Executive receive a report about Improper Conduct from an employee or external party this information should be forwarded to the Group Legal, Risk or HR Executive as soon as practicable after the report is made. All those who receive an initial disclosure should deal with those disclosures on a confidential basis. Unnecessary breach of confidentiality is a serious matter and may be subject to disciplinary actions.

The regional Legal, Risk and HR Executive will work with the Group Legal, Risk and HR Executives to investigate the matter.

### Investigating Reports

The regional or Group Legal, Risk and HR Executive, as appropriate, will undertake a review of the matter reported and perform any necessary investigation (both internal and external). During the investigation process reasonable steps will be taken so that the person reporting the matter is treated fairly and afforded confidentiality. Goodman will also provide fair treatment of any employees who are mentioned in disclosures.

Where appropriate and practicable, the person who reported the matter will be contacted to confirm that the matter has been investigated.

### Reporting

All matters will also be recorded in the Ethical Concerns Register and reported to the Risk and Compliance Committee. Any significant matters will also be reported to the Board.

### **Future Actions**

Where Improper Conduct has occurred, Goodman is committed to taking action in relation to those who have behaved improperly. This action may include disciplinary action up to and including termination of employment, or in cases involving criminal conduct, the disclosure of this to external authorities. Goodman will also consider the appropriateness of practices and procedures and potential improvements.

### **Governance**

Goodman is committed to complying with the laws and practices in relation to reporting of Improper Conduct. This Policy should also 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 including the rights and obligations of employees and how to respond to a report for those who receive reports is covered as part of training for employees.

This Policy has been approved by the Risk and Compliance Committee and is effective from June 2019. Goodman will review this Policy including its effectiveness every two years or earlier in response to any significant regulatory developments.