



Why do we have this policy?

Goodman has a Political Donations Policy to demonstrate our commitment to conducting our business with integrity and to communicate our policy to our Employees.

Definitions:

A **Political Donation** includes a gift made to, or for the benefit of:

- + a political party;
- + an elected member of Parliament or of a local council;
- + a candidate or group of candidates;
- + a third party campaigner; or
- + an employee of the local council or Government Department.

Specific examples of **Political Donations** are:

- + a donation of money;
- + a contribution, entry fee or other payment to participate in a fundraising event or function where it is primarily a political fundraiser and the payment forms part of the proceeds of the event;
- + a subscription paid to a political party for membership or affiliation;
- + non-cash donations such as gifts or prizes for a political fundraiser or purchasing items at a political fundraiser; and
- + provision of a service or goods e.g. the use of company vehicle, at no charge or at a discount.

Who does the policy apply to?

The policy applies to all directors, officers, employees, contractors, secondees and suppliers (where under relevant contractual obligation) of Goodman and its related bodies corporate (collectively called “Employees”).

What does this policy cover?

This policy sets out the common principles and minimum standards in relation to political donations and covers the following:

- + **Prohibition on Political Donations:** the general prohibition against Political Donations, with some minor exceptions as outlined in the policy;
- + **Prohibition on Bribery:** the restatement of Goodman’s prohibition on bribery as outlined in our Dealing with Public Official’s and Gifts Policy;
- + **Gift Giving:** the restatement of the general guidelines for reasonable and proportionate gift giving to public officials as outlined in our Dealing with Public Officials and Gifts Policy; and
- + **Personal Capacity:** the guidelines for Employees when acting in their personal capacity.



Prohibition on Political Donations

Goodman's policy around political donations is as follows:

- + Goodman will not make any direct Political Donations (monetary or otherwise) to political parties, elected members, candidates or groups of candidates, third party campaigners or Government employees;
- + Goodman will not contribute funds for membership or affiliation to political parties or individuals; and
- + Goodman will not make a donation to an individual or organisation such as a not for profit for the purpose of the individual or group making political donations;

In certain circumstances:

- + Goodman may pay for Employees to attend a political fundraising function on behalf of Goodman where it is lawful to do so and there is a corporate benefit for Goodman. In such an event the Employee must seek prior approval from the Regional CEO.

Prohibition on Bribery

Goodman strictly prohibits any activity that seeks to bribe, corrupt or otherwise improperly influence a public official in any country. A public official includes politicians, political parties and employees of Government bodies.

Gift Giving

Goodman recognises that bona fide corporate hospitality and legitimate business promotion is an established and important part of conducting our business. Employees can offer nominal gifts (not items of value) to a public official that are reasonable and proportionate to the position they hold. This means the gift must be for the purposes of relationship building, complies with Government codes, is lawful and will not be perceived as an intent to bribe. If there is any doubt as to the appropriateness of a gift, then the regional General Counsel should be consulted. All Employees must disclose any gifts in line with Goodman's Gifts Policy.

Personal Capacity

Employees 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 made clear that any political involvement is in their personal capacity and does not represent the views of Goodman.



Governance

Goodman is committed to complying with the laws and practices in relation to political donations and bribery. For this purpose, this policy should be read in conjunction with the following policies:

- + [Code of conduct](#): this policy aims to establish a high standard of conduct and to communicate this to our Employees;
- + [Gifts](#): this policy outlines the general prohibitions and guiding principles that should be considered when giving or receiving gifts and the concept of reasonable and proportionate gift giving and receiving;
- + [Dealing with public officials](#): this policy applies to the reasonable and proportionate giving of gifts to public officials and prohibits bribery; and
- + [Employee reporting and protection policy](#): this policy encourages the reporting of improper conduct by protecting those employees who raise concerns about unacceptable behaviour.

This policy was adopted by the Boards with effect from 12 August 2015 and will be regularly reviewed.

Goodman takes any breach of this policy seriously. Breaches of this policy are also a breach of conditions of employment and may lead to disciplinary action, including dismissal or termination of engagement and referral to regulatory authorities.