

# ETHICAL CONCERNS (WHISTLEBLOWER) POLICY

## 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 non-executive directors (Directors) as well as employees and contractors (team members) and suppliers 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 serious or systemic breach of the Code of Conduct or another Goodman policy (including in relation to bribery and corruption, insider trading, harassment, failing to disclose a conflict of interest or money laundering)
- An unsafe work practice or human rights issues; or
- Any other conduct that is of serious concern and may cause loss to Goodman or may damage Goodman's reputation or interests.

**Note:** Improper Conduct does not generally include customer complaints or work-related grievances that impact an individual but do not have a broader implication for Goodman.

+ **Discloser** for the purposes of this policy includes a current or former officer, team members, supplier, employee of a supplier, associate or any relatives or dependents of these individuals, customers, capital partners or public 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. General work-related grievances are generally not classified as Improper Conduct and should be reported to your manager or Human Resources Executive unless, because of their seriousness, they may constitute 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.

## How do we apply this policy?

### Raising concerns

Goodman has several channels to raise any concerns about Improper Conduct. If you need further information before making a disclosure you are encouraged to contact [ethicalconcerns@goodman.com](mailto:ethicalconcerns@goodman.com) or seek independent legal advice.

Team members are encouraged to raise any concerns of Improper Conduct to the Regional CEO or regional Legal, Risk or HR Executive. Team members 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.

Team members and external parties can also raise any concerns to Goodman, via the Contact us+ form on the Goodman website, which can be made anonymously (and still be a protected disclosure).

Concerns can also be emailed to: [ethicalconcerns@goodman.com](mailto:ethicalconcerns@goodman.com)

Disclosures can also be made to regulatory bodies and in some instances, such as a public interest or emergency disclosures, to a journalist or parliamentarian.

## 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 (confidentiality).

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 enough information to support a reasonable basis for an investigation. Goodman can take disciplinary action against a team member 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.

Compensation and other remedies may be available under the law for those who make a disclosure under this policy with a reasonable basis and suffer any loss. A Discloser may also be protected from any civil, criminal and administrative liability protection as a result of their disclosure.

For those who have disclosed Improper Conduct employee support services are available and case by case changes may be made to working arrangements.

If a team member 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 team members, 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 a team member 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.

Where a Discloser wishes to remain anonymous they may wish to consider providing for ongoing communication so any questions can be answered or for feedback to be provided during the course of the investigation.

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 team members 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 Improper Conduct matters will 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 ethical concerns and is guided by the Corporations Act and any other applicable legislation. 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 is covered as part of training for team members.

This policy has been approved by the Goodman Boards and is effective from June 2022. Goodman undertakes to review this policy including its effectiveness annually or earlier in response to any significant regulatory developments.

