

STATEMENT OF BUSINESS ETHICS

Why do we have this policy?

Goodman is committed to strong business ethics and promoting social, environmental and human rights standards across our operations and supply chain.

These are the guidelines under which Goodman operates so as to maintain an ethically run business.

Goodman requires its directors, team members and contractors to:

- + Act in a professional and ethical manner
- + Work as a team and respect others including promoting a diverse environment and not engaging in bullying, harassment and discrimination
- + Treat suppliers, agents and other external parties fairly and encourage fair and open competition while seeking value for money
- + Value honesty and integrity and report any unethical, unlawful or improper behaviour by our suppliers, agents or other external parties
- + Follow the law and Goodman's policies
- + Respect confidentiality and protect Goodman commercial information and not misuse any information
- + Focus on sustainability including considering the planet and all the people on it
- + Manage conflicts of interest including:
 - That dealings with suppliers, agents and other external parties are at arm's length and keeping accurate and transparent records of those dealings
 - Not accepting from, or offering to, a supplier, agent or other external party any improper financial or other benefits, that might influence business decisions.



Code of Conduct

Goodman procures goods and services from a broad and diverse global network, has long term relationships with its customers, manages investments for its capital partners and regularly buys and sells land and properties throughout the world. We seek to develop partnerships with suppliers, agents and other external parties that operate with aligned values and standards by considering legal, regulatory, social, environmental and human rights related factors.

We require that all suppliers, agents and other external parties (including any person who is an employee, contractor or sub-contractor of a supplier, agent or other external party), dealing with or in any way on behalf of Goodman, abide by the below Code of Conduct.

We also expect you to communicate these requirements within your operations and your own supply chain. Goodman may seek to confirm compliance by requesting additional information. You are expected to respond in a timely manner to any requests for information.

Suppliers, agents and other external parties who provide goods and services to Goodman or are in any way engaged by or on behalf of Goodman, are expected to:

Governance

- + Comply with all relevant laws, regulations and standards including those related to safety, environment, human rights, tax, anti-corruption, anti-bribery, anti-money laundering, competition, modern slavery labour practices and minimum wage
- + Comply with contractual obligations and tender conditions.

Social, ethics and safety

- + Act honestly and ethically at all times
- + Not engage in fraud, bribery or corruption
- + Not engage in collusive or anti-competitive conduct in the preparation of quotations or tenders
- + Not make political donations in any way connected to Goodman or the supplier's, agent's or other external party's dealings with Goodman
- + Promote zero tolerance to bullying, harassment and discrimination
- + Promote diversity, inclusion and belonging
- + Encourage employment of minority, disabled, women owned businesses and indigenous persons within the workforce
- + Operate with a high focus on safety, comply with Goodman safety policies and standards and provide safety data when required
- + Provide access to employee training
- + Keep proper records of the services and arrangements with Goodman and not to make any false, inaccurate or incomplete entries in the financial books in connection with the services or arrangements with Goodman
- + Not offer, directly or indirectly, to any Goodman team members any financial or other inducements (including kick-backs, payments-in-kind or facilitation payments) which may result in you gaining an unfair advantage in your dealings with Goodman
- + Not offer, directly or indirectly, to any person on behalf of, or in any way connected with Goodman (including to any government official or functionary) any financial or other inducements (including kick-backs, payments-in-kind or facilitation payments) which may result in Goodman gaining an unfair advantage in any way or which may (or may be seen to) induce any person to perform functions or activities improperly.

Environment

- + Prioritise environmental risk management and take all reasonable steps to avoid pollution, the creation of waste and damage to the natural environment
- + Minimise the use of materials and resources without compromising quality and seek out environmentally friendly non-toxic products and materials
- + Seek out opportunities to reduce energy and water consumption across your operations and supply chain
- + Support Goodman in meeting its climate risk management targets including opportunities to reduce embodied emissions in the materials, products and services provided.

Human Rights

- + Respect human rights and take reasonable steps to identify and assess risks of modern slavery practices in your operations and supply chains
- + Take all reasonable action to address any modern slavery issues in your supply chain and work with Goodman to remedy any instances of modern slavery
- + Source services, materials and products from ethical suppliers who comply with all relevant legislation and seek to avoid child labour and modern slavery.

Non Compliance with this Code of Conduct may result in the following:

- + Requirement to rectify the issue
- + Termination of the contract with Goodman and loss of future work for any significant and sustained breaches
- + Loss of reputation
- + Referral to the Police or relevant authorities.

How to report concerns

Goodman encourages the reporting of improper and unethical conduct. Suppliers, agents and other external parties are encouraged to report any of the below to Goodman:

- + Dishonest, fraudulent, corrupt, illegal or unethical behaviour
- + Goodman team members or other Goodman contractors not acting consistently with the Statement of Business Ethics
- + An unsafe work practice.

You can contact us:

By email: ethicalconcerns@goodman.com

Website: You can also raise your concerns via [Contact Us](#) on the Goodman website which can be made anonymously.

