

ETHICAL CONCERNS (WHISTLEBLOWER) POLICY

Goodman is committed to conducting its business in accordance with our values and a culture of integrity, compliance and ethical behaviour. Goodman fosters a positive and open environment that encourages and supports the reporting of concerns about any behaviour that is inconsistent with our Code of Conduct or doesn't reflect our values.



Why do we have this policy?

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 protect Disclosers who raise concerns of misconduct in relation to Goodman or parties we contract with where they had reasonable grounds to suspect Improper Conduct.

Definitions

+ **Improper Conduct** for the purposes of this policy includes behaviour that is dishonest, fraudulent, corrupt, illegal or unethical, including:

- Fraud, money laundering or misappropriation of funds
- Theft, violence or stalking
- Offering or accepting a bribe
- Financial irregularities
- Breach of legal or regulatory requirements
- An unsafe work practice or a human rights issue
- A serious or systemic breach of the Goodman Code of Conduct
- 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 (who can make a protected disclosure) includes a current or former:

- Goodman Director or Company Secretary
- Goodman employee – our people/team members employed by Goodman on a permanent, casual or term-based contract
- Contractor – independent contractors and their employees and sub-contractors providing services to Goodman in the workplace
- Supplier – supplier of services or goods to Goodman including their employees and sub-contractors e.g. contractors, consultants, service providers and business partners
- Associate of Goodman
- Spouse, relative or dependent of the above.

+ **Recipient** for the purposes of this policy (who you can make a protected disclosure to) is a Director, Company Secretary or senior manager of Goodman (the Group or Regional CEO or Group or regional Legal, Risk, HR Executive).

What does this policy cover?

This policy sets out the common principles and minimum standards for the disclosure 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 Manager (in your country) unless, due to their seriousness, they may constitute Improper Conduct. This policy sets out Goodman's commitment to ethical conduct by addressing any concerns and protecting Disclosers 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 or seek independent legal advice.

Disclosers are encouraged to raise any concerns of Improper Conduct to a Recipient. Disclosers 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.

Disclosures can also be made to Goodman's auditors, regulatory bodies or a legal practitioner. In some instances, such as cases involving public interest or an emergency, disclosures can be made to a journalist or parliamentarian.

Protection for Disclosers who report Improper Conduct

Goodman is committed to protecting people who disclose Improper Conduct under this policy, including identity protection (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 Conduct on the part of another person can be damaging to that person and others so it is important that any allegations can be backed up with enough information to support a reasonable basis for an investigation. Goodman can take disciplinary action against an employee or contractor 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, as relevant, including 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 protected 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 Discloser 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 Recipient receives a report about Improper Conduct from a Discloser 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.

All reports are confidential, and Disclosers may wish to remain anonymous. It is however helpful for an investigation if contact details are provided, to allow for ongoing communication so any questions can be answered or for feedback to be provided during the course of the investigation.

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 and contractors who are mentioned in disclosures.

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

Reporting

All Improper Conduct matters are recorded in the Ethical Concerns Register including the type of Improper Conduct and actions taken. Any significant disclosures are reported to the Audit, Risk and Compliance Committee who will escalate the matter to the Board where appropriate.

Future actions

Where Improper Conduct has occurred, Goodman is committed to taking action in relation to those who have behaved improperly. This action can be disciplinary action including termination of employment or summary dismissal for employees, termination of the engagement of services for contractors, or in cases involving criminal conduct, the disclosure of this will be made 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 disclosures and is guided by the Corporations Act and any other applicable legislation and guidance. This policy should also be read in conjunction with Goodman's other key policies including the Goodman Code of Conduct. This policy is available on the Goodman website and Intranet, the "Greenroom". Training is provided on this policy.

This policy has been approved by the Audit, Risk and Compliance Committee and is effective from June 2024. Goodman undertakes to review this policy including its effectiveness every two years or earlier in response to any significant regulatory developments.



Questions

If you have any questions about this policy, please speak with your manager, or a Legal, Risk or HR Executive.

Date approved	June 2024
Next review date	June 2026
Approved by	Audit, Risk and Compliance Committee