

SEXUAL HARASSMENT POLICY

Goodman is committed to providing a safe, respectful and diverse workplace that is free from sexual harassment. We have zero tolerance for sexual harassment, victimisation or sex discrimination. This can be a risk to the health and safety of our people. The prevention of sexual harassment is a responsibility shared by everyone and we expect you to behave in a professional manner which includes demonstrating courtesy and respect so that the workplace remains positive, safe and inclusive. Sexual harassment will not be tolerated, and disciplinary action will be taken against anyone who breaches this policy.

Greg Goodman, CEO, Goodman Group



Why do we have this policy?

Goodman is committed to preventing workplace sexual harassment and aims to:

- + Create a working environment which is free from sexual harassment, is positive and inclusive and where all team members are treated with courtesy and respect
- + Implement training so that all managers and team members are aware of their rights and responsibilities
- + Provide an effective procedure for raising complaints
- + Treat all complaints in a sensitive, fair, timely and confidential manner
- + Guarantee protection for complainants from any victimisation or reprisal
- + Encourage the reporting of behaviour which breaches the sexual harassment policy
- + Promote appropriate standards of conduct at all times.

Who is covered by this policy?

The policy extends to anyone who works for Goodman including non-executive directors (Directors) as well as employees and contractors (team members). Everyone who interacts with Goodman is also covered by this policy including prospective employees, customers, suppliers, consultants and partners. It is applicable in all locations around the world and compliance with it is crucial.

What is sexual harassment?

Sexual harassment is any unwanted, unwelcome or uninvited behaviour of a sexual nature which makes a person feel humiliated, intimidated or offended. Sexual harassment can take many forms and may include sexually suggestive comments or jokes, intrusive questions about a person's private life or physical appearance, inappropriate staring or leering that makes a person feel intimidated, inappropriate physical contact or other behaviour which creates a sexually hostile working environment.



Other examples of sexual harassment

Sexual harassment happens in person, over the phone and online including via social media and does not need to be repetitive – it can be a single incident and includes:

- + Repeated or inappropriate requests for a date or requests/ pressure for sex
- + Indecent messages (SMS or social media), social media comments, phone calls or emails including the use of emojis with sexual connotations
- + Accessing and sharing sexually suggestive images, videos, cartoons, drawings, photographs or jokes
- + Sharing or threatening to share intimate images or video without consent
- + Displaying offensive screen savers, photos, calendars or objects
- + Suggestive nicknames for co-workers
- + Sexual gestures or inappropriate display of the body
- + Physical or sexual assault, indecent exposure, stalking or obscene communication.

It is important to note that a person may not necessarily voice their objections towards inappropriate workplace sexual behaviours but that does not mean they are consenting to the behaviour or are not humiliated, intimidated or offended. The intention of the alleged harasser is not relevant, nor do they need to have a sexual interest or be of the same sexual orientation as the person being harassed.



What sexual harassment is not?

Sexual harassment is not behaviour which is based on mutual attraction, friendship and respect. If the interaction is consensual, welcome and reciprocated it is not sexual harassment.

Behaviour between team members arising from a mutual sexual or romantic relationship is not sexual harassment. However, managing this situation can become particularly difficult where the relationship later breaks down and a complaint of sexual harassment is made. It is therefore important to disclose to the Human Resources Manager in your country (or CEO in your country) a close personal relationship with another team member where it would be reasonably expected that a potential conflict of interest could arise. For personal relationships that may not necessarily give rise to a conflict of interest, disclosure is also encouraged to manage any rumours and deal with any adverse issues from workplace relationships including the perception of favourable treatment. Refer to our Person Relationships Policy for further information.

Is sexual harassment lawful?

There are number of laws and regulations that make sexual harassment illegal including work, health and safety laws, anti-discrimination, equal opportunity and human rights laws, workers' compensation laws and criminal law. Legal action can be taken against you for sexual harassment, and you could also be exposing Goodman to liability.

When can sexual harassment occur?

Sexual harassment does not only occur during working hours, or in the workplace itself. Sexual harassment is unlawful in any work-related context. The test that applies is that if any connection with work exists then it is work-related. This can include working flexibly from home, after hours work functions or office social events, conferences, training seminars, on social media and during business travel.

At social events with a work connection, care must be taken when consuming alcohol as being under the influence of alcohol is no excuse for sexual harassment. Being impaired by alcohol and/or drugs at a work-related function is a violation of the Substance Abuse Policy and is likely to lead to termination of employment.

Who can harassment occur between?

Sexual harassment can occur between team members or between team members and any external party. A person can be sexually harassed by their manager, a colleague, prospective employee, customer, supplier, consultant or one of our partners. Goodman will investigate any allegations of sexual harassment by internal and external parties and take action with the intention of keeping the workplace safe.

What are my responsibilities as a manager?

Goodman has a legal responsibility to prevent sexual harassment, or it can be liable for the behaviour of our team members.

Managers have a responsibility to:

- + Monitor the working environment for acceptable standards of conduct including at work related social events
- + Model appropriate behaviour
- + Promote Goodman's Sexual Harassment Policy within your team
- + Treat all complaints seriously and escalate to the Human Resources Manager (in your country) immediately.

What are my responsibilities as a team member?

All team members have a responsibility to:

- + Comply with Goodman's Sexual Harassment Policy and other workplace policies including the Group Code of Conduct and Personal Relationships Policy
- + Offer support to anyone who is being harassed and advise them to speak with their manager or Human Resources Manager about the issue
- + Disclose to your manager or Human Resources Manager any harassing behaviour you witness and maintain confidentiality about the issue
- + Maintain complete confidentiality if you provide information during the investigation of a complaint.

How can I make a complaint of sexual harassment?

If you are being sexually harassed you are encouraged to disclose this to your manager, Human Resources Manager or Regional CEO. You are not expected to deal with the harassment yourself and you are only encouraged to confront the harasser if you feel confident enough to do so.

If you are unsure about some behaviour you are encouraged to have a confidential discussion with your manager, Human Resources Manager or Regional CEO. You can also raise concerns via ethicalconcerns@goodman.com or make an anonymous disclosure on the contact us page of the Goodman website.

What happens after a complaint is made?

Where sexual harassment is alleged, it will be investigated either internally or externally in an independent, confidential, thorough and timely manner. Where the alleged conduct is criminal in nature (physical or sexual assault, indecent exposure, stalking or obscene communications) this will be referred to the authorities. During the investigation measures may be put in place to support the complainant and alleged harasser including employee support services and changes to working arrangements on a case by case basis.

What happens if the sexual harassment is proven?

If the complaint is proven (substantiated) then consequences may range from an apology, counselling, adverse financial consequences such as reduction in, or forfeiture of, short and long term incentives, and termination of employment. Sexual harassment is a very serious matter and termination of employment is a likely outcome. This principle applies irrespective of the seniority of the team member – the treatment is consistent. Action will also be taken against anyone who victimises or retaliates against a person who has complained of sexual harassment and anyone who is found to have made a vexatious or malicious complaint.

Governance

Goodman is committed to maintaining workplaces that are safe and free of sexual harassment. This policy should also be read in conjunction with Goodman's other corporate governance policies including the Group Code of Conduct, Ethical Concerns (whistleblower) Policy, Inclusion and Diversity Policy, Personal Relationships Policy and Workplace Bullying and Harassment Policy. 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 2023. Goodman will review this policy including its effectiveness annually or earlier in response to any significant regulatory developments.