1. Purpose

The purpose of this policy is to provide Stockland employees with clear guidance on what is expected of them when engaging with government. It applies to all Stockland Business Units, in all states where we operate.

Stockland prides itself on having a high level of engagement with all tiers of government. We strive to be a trusted partner of government, providing a clear and consistent approach to engagement at all levels across our business.

Led by our Government Relations team, we actively engage with politicians, public servants, regulators and our industry bodies about policy decisions in general, and those that affect our projects and properties in particular.

Stockland does not make any political donations. This policy has been in place since 1 July 2008.

2. Scope

This Policy applies to Stockland Corporation Limited, Stockland Trust and their related companies and trusts (collectively “Stockland”) and all Stockland employees (including, but not limited to non-executive directors, permanent, casual, fixed term employees and temporary workers). Adherence to this Policy is mandatory.

3. No Political Donations

We do not make political donations at any level. This includes physical gifts, provision of services or cash donations. In some States and Territories it is a criminal offense for any person or organisation considered a property developer to make or offer donations.

Stockland employees do not attend political fundraisers as representatives of Stockland, regardless of who is paying, including conferences, seminars, breakfasts, lunches or dinners. Where a charity or worthy cause is being supported by elected representatives on a multi-partisan basis, Government Relations may approve funding or the attendance at a function after confirming that the event does not constitute a political donation.

4. No Gifts to Politicians and Public Servants

We do not give any gifts to politicians or public servants. A vote of thanks and a follow up letter are recommended as the best approach to expressing appreciation to government representatives for attending Stockland functions.
5. Access to our Properties and Projects

Requests to visit our properties and projects by candidates or politicians must be agreed in advance with Government Relations and the Centre Manager, with consideration given to the convenience of our retailers and customers.

All requests to visit our properties are considered in line with our multi-partisan approach. Politicians may conduct community-oriented events in our properties occasionally in the course of carrying out their representatives duties, provided visits do not have a campaigning tone.

Where a visit is considered appropriate, we will seek the politician’s agreement to:

- Ensure the visit does not inconvenience our customers or retailers, or the day-to-day operations of our assets;
- Limit the duration of the visit to approximately two hours, with a limited number of staff/volunteers in attendance;
- Not hand out or display negative or otherwise inflammatory flyers or other materials to retailers or customers during the visit.

6. Long Term / Permanent Tenancy and Casual Leasing

Elected representatives are welcome to be permanent tenants in our retail centres. The Government Relations team should be advised in advance of accepting a request. No rental discount or other non-standard incentives should be applied to this lease.

Elected representatives are permitted to apply for casual mall leasing up until six months prior to an election.

7. Personal Political Activity

Our people may choose to engage in lawful political activity outside of their work but must be mindful of their role as a Stockland employee and follow the Government Relations Policy.

8. Policy Compliance

8.1. Employees who breach this policy may face disciplinary action up to and including dismissal.

8.2. You must adhere to Stockland’s Escalation Policy in reporting any breach of this policy that you are involved in or become aware of and do so in a timely manner.

9. Review

This Policy is reviewed and updated:

- At least once every two years; or
- When there are relevant changes in business practice, legislation and compliance obligation Contact for Questions
Please contact Llew Gartrell, General Manager Government Relations, for questions on this document.

10. Document Control
This version was approved by the Stockland Board in March 2023.