

Whistleblower Policy

1 Purpose

Stockland is committed to conducting our business ethically, with integrity and with consideration to our stakeholder expectations.

Stockland therefore encourages all Employees and stakeholders (which include Stockland securityholders, customers, suppliers, external business partners and the community) (collectively “**Stakeholders**”) to raise any concerns over any alleged Improper Conduct they encounter.

The purpose of this Policy is to outline the method for Employees and Stakeholders to raise concerns about unacceptable behaviour in good faith, while also offering protection from victimisation, harassment or disciplinary proceedings (pursuant to Section 3.5).

2 Scope

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

The Principles of this Policy also applies to Stakeholders who wish to raise concerns over any allegations of Improper Conduct they encounter.

3 Principles

The key principles which guide Stockland’s approach to whistleblowers are as follows:

3.1 Improper Conduct

Stockland considers the following to be Improper Conduct by either an Employee or a Stakeholder, for the purpose of this Policy:

- (a) illegal, fraudulent, dishonest, corrupt or unethical conduct;
- (b) bullying, harassment or discrimination;
- (c) unsafe work practices;
- (d) any conduct which:
 - indicates a failure to follow and disregard for a corporate process, policy or procedure;
 - potentially breaches a law, regulation or an obligation under a contract;
 - has the potential to damage Stockland’s reputation;
- (e) a decision or impending decision which is likely to result in any of the above; or
- (f) any attempt to conceal any of the above conduct.

Concerns raised of any alleged Improper Conduct will be investigated as per Section 3.6.



3.2 Raising Concerns

If an Employee or Stakeholder becomes aware of any alleged Improper Conduct, they should raise their concern:

- To Stockland's Group Risk team by emailing compliance@stockland.com.au;
- To Stockland's Whistleblower Protection Officers ("WPOs") by emailing whistleblowing@stockland.com.au; or
- Anonymously via the process set out at Section 3.3 below.

3.3 Raising Concerns Anonymously

Employees or Stakeholders who would prefer to raise any concerns regarding any alleged Improper Conduct can anonymously contact Stockland's WPOs either via:

- Stockland's intranet
<https://stocklandnet.sharepoint.com/AdvisoryServices/strategicrisk/Pages/Tellme.aspx>; or
- Stockland's external website
<https://www.stockland.com.au/about-stockland/corporate-governance/whistleblower-channel>

The WPOs are Stockland's General Counsel and Group Risk Officer. The WPOs will handle all complaints confidentially and have the responsibility of providing Employees and Stakeholders with protection against reprisal or disadvantage.

3.4 Confidentiality

All allegations of Improper Conduct raised and investigated under this Policy will be treated as confidential. Stockland will not disclose information to anyone not connected with the investigation without the consent of the person raising the concern (where contact details are provided for consent to be obtained), unless the WPOs and/or the investigating officer are obliged to do so by law or to our auditors in accordance with our compliance program and/or agreed audit scope.

A whistleblower has the option of reporting anonymously or identifying themselves when making a disclosure of any alleged Improper Conduct in accordance with this Policy. Information coming into the possession of a person from a whistleblower, the identity of a whistleblower or information which may lead to their identity, must not be released to anyone who is not involved in the investigation or resolution of the matter without authority from either of the WPOs.

3.5 Protection for Whistleblowers

The WPOs will protect the interests of a whistleblower in accordance with this Policy and any applicable legislation. All reasonable steps will be taken by Stockland and the WPOs to protect the whistleblower from reprisal or disadvantage as a result of raising their concern(s).

It is a breach of this Policy for any Employee to cause personal disadvantage to a whistleblower who discloses any alleged Improper Conduct under this Policy in good faith. Disadvantage includes, but is not limited to:

- Dismissal or demotion;
- Reprisals from other Employees, including harassment and discrimination; and
- Current or future bias.

Any whistleblower who feels they have been disadvantaged as a result of making a disclosure should contact Stockland's WPOs to discuss their concerns by sending an email to whistleblowing@stockland.com.au.



3.6 Investigation Process

All complaints will be investigated in a fair and objective manner, including the involvement of external parties where appropriate. It is the responsibility of the WPOs to make sure the whistleblower is kept informed of how the complaint is proceeding (where the whistleblower provides contact details). Where it has been established that Improper Conduct has occurred, Stockland is committed to changing internal processes and taking action in relation to Employees who have behaved improperly.

3.7 False and dishonest allegations

No action will be taken against an Employee for making an allegation or raising their concern in good faith, even where no wrongdoing is identified. Stockland may take the appropriate action against an Employee or a Stakeholder who deliberately makes a false and dishonest allegation of Improper Conduct.

4 Policy Compliance

Failure to comply with this Policy may result in substantial fines and penalties being imposed upon Stockland, and may expose Stockland and/or its Employees to civil or criminal liability or other financial or reputational damage. It may put our Australian Financial Services (AFS) licences and other business Licences at risk. Employees who breach this Policy may face disciplinary action which could include dismissal.

Employees must adhere to Stockland's Escalation Policy in reporting any breach of this Policy that they are involved in or become aware of, and do so in a timely manner.

5 Review

This Policy is reviewed and updated:

- When applicable and appropriate, including when there are relevant changes in business practice, legislation and compliance obligations; and
- At least every two years.

6 Related Policies

- [Code of Conduct](#)
- [Fraud and Corruption Policy](#)
- [Anti-Competitive Behaviour Policy](#)
- [What Stockland Expects from its Suppliers](#) (guideline)

7 Contact for Questions

Please contact Stockland's Group Risk team at compliance@stockland.com.au for any questions on this document.