

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, fixed term employees and temporary workers) (“**Employees**” or “**you**”). Adherence to 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.

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.

3.3 Raising Concerns Anonymously

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

- Stockland's intranet (i.e. available for employees only)
<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>

Employees that are not comfortable or able to report misconduct internally, may report to Stockland's external and independent whistleblowing service provider. Stockland has contracted Your Call to receive and manage your report with impartiality and confidentially. This option allows you to:

- remain completely anonymous
- identify yourself to Your Call only
- identify yourself to both Your Call and Stockland.

The Your Call reporting options include:

- Website www.yourcall.com.au/report 24/7
- Telephone 1800 940 379, between 9am and 12am during recognised business days, AEST

Online reports can be made via the website address listed above. You will be required to enter Stockland's unique identifier code Stockland1952. Your Call remains the intermediary at all times, receiving and forwarding communication between all parties, including WPOs. You will be able to securely upload any relevant documentation and/or material relevant to your disclosure. After making a disclosure, you will be provided with a unique Disclosure Identification Number (DIN) and access to a secure online Message Board. The Message Board allows ongoing anonymous communication with Your Call and/or Stockland. The Message Board can be used to receive updates, share further information/evidence and request support or report retaliation. If you cannot access the Message Board, you can contact Your Call via phone (above) for verbal updates.

National Relay Service

If you have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service. Simply choose your contact method at www.relayservice.gov.au and request Your Call's hotline 1800 940 379. If you have difficulty speaking or understanding English, contact us through the [Translating and Interpreting Service](#) (TIS) [131 450](tel:131450) and ask for Your Call on 1800 940 379.

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 provided 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 changes in business practice, legislation and compliance obligations; and
- At least every 2 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 with any questions on this Policy.