



# Whistleblowing Policy

## Why does Stockland have a Whistleblowing Policy?

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Stockland has a strong commitment to ensuring that all its business activities are carried out in a way that is both ethical and compliant with regulations. With this in mind, and as part of Stockland's culture of openness, commitment and empowerment, employees are encouraged to report any improper conduct they encounter. Stockland has a Whistleblowing Policy to protect employees who raise concerns about unacceptable behaviour.

## What does this mean for the employee?

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The purpose of this policy is to encourage reporting of improper conduct by outlining the way Stockland will protect those employees making such reports of improper conduct (whistleblowing).

This policy also aims to make employees feel confident about whistleblowing, by Stockland providing a confidential response mechanism that protects employees from reprisal or disadvantage.

## Breach

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Breach of this policy will be taken very seriously and may result in disciplinary action, up to and including the termination of employment.

## Improper Conduct

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For the purposes of this policy, 'improper conduct' can be defined as:

- Conduct which is dishonest, fraudulent, corrupt, illegal or unethical
- In breach of Stockland's Code of Conduct or another Stockland Policy
- Bullying, harassment, or discrimination
- An unsafe work practice
- Any other conduct which may cause loss to Stockland or may damage Stockland's interests

## Raising Concerns (Directly)

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Employees, in the first instance, should disclose information in relation to improper conduct to their Direct Manager. Where this is not possible, for example, the Direct Manager is involved in the conduct or the response is not satisfactory, Stockland has a number of other business channels for reporting improper conduct including:

- Occupational Health & Safety Manager—Workplace Health & Safety matters
- Human Resources Manager—Stockland Code of Conduct, bullying discrimination or harassment matters

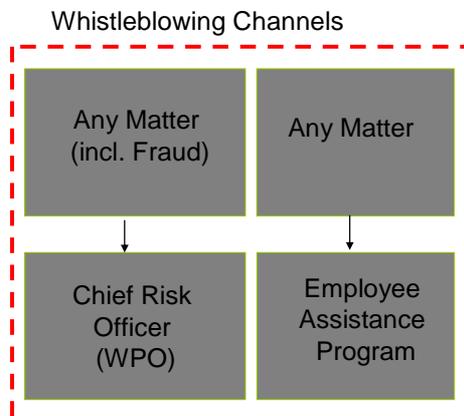
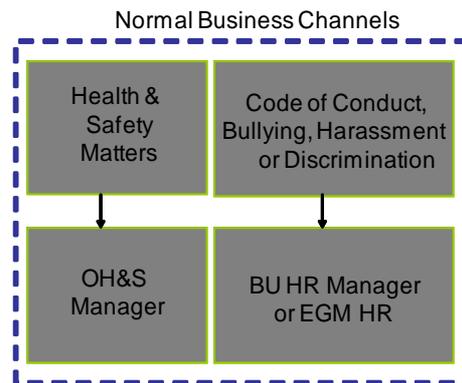
## Raising Concerns (Anonymously)

A Whistleblowing reporting channel is available for reporting any improper conduct. This channel can be used if the normal business channels are not appropriate or if the employee wishes to report the improper conduct anonymously. The Whistleblower channels are:

- *Whistleblower Protection Officer (WPO)* — Employees can direct complaints of improper conduct to the WPO. The WPO is the Chief Risk Officer who can be contacted anonymously via our intranet using the “Tell Me” facility located within the Group Risk pages or by phone. The WPO will handle all complaints confidentially and has the responsibility of providing individual employees with protection against reprisal or disadvantage.
- *Employee Assistance Program (EAP)* — Employees can also discuss their concerns confidentially with a counsellor through Stockland’s EAP. An employee may ask the counsellor to approach Stockland on their behalf regarding a complaint. The EAP can also be used as a source of support for those employees who have raised concerns under this Policy.

## How to Raise Concerns

There are various channels that employees can use to raise concerns of improper behaviour. In the first instance employees should contact their Direct Manager. If this is not possible or appropriate then use either channel listed below:



## Confidentiality

A whistleblower has the option of reporting anonymously or identifying themselves when using the Whistleblower reporting channels. 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 the WPO.

All disclosures 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 complaint, or unless the WPO and/or the investigating officer are obliged to do so by law.

## **Protection for Whistleblowers**

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The WPO will protect the interests of the whistleblower in accordance with this Policy and any applicable legislation. All reasonable steps will be taken to protect the whistleblower from reprisal or disadvantage.

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

- Dismissal or demotion,
- Reprisals from other employees, including harassment and discrimination
- Current or future bias

An employee who feels they have been disadvantaged as a result of making a report should contact the WPO.

## **Corporations Act 2001**

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Whistleblowers who report a breach of the Corporations Act 2001, with reasonable grounds to suspect the breach and make the report in good faith, have the benefit of the protections available under the Corporations Act. The whistleblower must identify themselves when making the report, as anonymous reports are not protected under the Corporations Act.

## **Investigation Process**

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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 WPO to make sure the whistleblower is kept informed of how the complaint is proceeding. Where improper conduct has occurred, Stockland is committed to changing our processes and taking action in relation to employees who have behaved improperly.

## **False and Dishonest Disclosure**

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Stockland may take disciplinary action against an employee who deliberately makes a false and dishonest disclosure of improper conduct. No action will be taken against an employee where the report was made in good faith, regardless of whether any wrongdoing was identified.

## **Governance**

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Stockland is committed to complying with the laws and practices that protect the rights of whistleblowers and is guided by the Australian Standard 'Whistleblower Protection Programs for Entities AS 8004-2003'. Stockland undertakes to review this Policy at least annually for effectiveness and improper conduct is reported to the Audit Committee and Executive Management.



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