

Policy

1. Purpose

The purpose of this policy is to define the Cromwell Property Group (Cromwell) approach to managing energy.

2. Scope

This policy applies, but is not limited to, all Cromwell employees who engage in the management of our real estate assets.

Where Cromwell has operational control of the real estate asset, our responsibilities will extend to energy management best practice.

For real estate assets where Cromwell does not have operational control, we will seek to obtain data, disclose consumption and to engage and encourage tenants to adopt energy management best practice.

3. Policy Statement

Cromwell's commitment to energy management is to undertake, where practicable, activities in a best-practice sustainable manner.

Cromwell is committed to:

- minimise the energy requirements of our assets
- support sustainable sourced energy
- fostering an organisational culture that promotes energy conservation and engages with its stakeholders to encourage energy saving behaviour.
- developing and maintaining environmental frameworks and reporting that promotes data integrity, enables transparent communication & continuous improvement.

4. Policy Objectives

Cromwell will demonstrate its commitment to its energy management principals by ensuring that it:

- Sets and publicly reports against carbon intensity and energy targets
- Develops procurement practices that comply with Cromwell's sustainability objectives
- Provides targeted training and education to staff
- Engages with stakeholders to encourage energy saving behaviour
- Scopes and implements an appropriate Environmental Management System
- Monitors and reviews performance to ensure continual improvement.

5. Governance and Responsibilities

Development and review of this policy is the responsibility of the Environmental Pillar in conjunction with the Chief Sustainability Officer (CSO). The Environmental Pillar is responsible for ensuring that adequate resourcing is provided and that the implementation of this policy is delegated to competent persons charged with preparing appropriate procedures and controls and for supervising energy management activities.

This policy will be reviewed on the introduction of significant changes in the operations of Cromwell's real estate assets, introduction of new legislation, in response to changes in expectation by the industry or real estate benchmarks or no later than every three years.

Performance against real estate benchmarks will be reported to the Board and to the CSO and used to evaluate future policy and objectives on an ongoing process.