

# Policy

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## 1. Purpose

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

## 2. Scope

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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 adopting waste management best practice.

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

## 3. Policy Statement

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Cromwell's commitment to waste management is to undertake, where practicable, activities in a best practice sustainable manner. Cromwell is committed to:

- avoiding & reducing waste
- reusing & recycling waste
- waste management practices that protect the environment and community
- incorporating risk management and workplace health and safety best practice in waste management
- fostering an organisational culture that promotes waste management and resource recovery best practice
- engaging stakeholders and encouraging waste management behaviour
- developing and maintaining environmental frameworks and reporting that promotes data integrity, enables transparent communication & continuous improvement.

## 4. Policy Objectives

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

- Sets and publicly reports waste efficiency targets
- Provides site specific waste management plan

## Waste Management Policy

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- Promotes adoption of best practice waste management plan for all new fitouts
- Develops best practice waste reporting per asset
- Properly identify, monitor and manage risks
- By ensuring that it develops procurement practices that comply with Cromwell's sustainability objectives
- Provides targeted training and education to staff and stakeholders
- Engages with stakeholders to encourage best practice waste management behaviour
- Scopes and implement an appropriate Environmental Management System
- Monitors and reviews performance to ensure continual improvement

## 5. Governance and Responsibilities

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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 waste 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.