

# 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 water consumption and effluent.

Our water conservation policy is intended to recognise and provide a response to the increasing demand for potable water from growing populations and urbanisation.

## 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 avoiding unnecessary use or waste of potable water as well as rain water runoff and the reduction of effluents.

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 water management best practice.

## 3. Policy Statement

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Cromwell will apply the following water conservation principles within the real estate assets that are managed and controlled by us:

- efficiently use and manage water
- reduce water consumption and, where possible, use alternatives to potable water
- minimise peak stormwater flows and the runoff of pollutants into stormwater drainage
- will foster a culture that promotes water conservation and engages with its stakeholders to encourage water saving behaviour
- will develop and maintain environmental frameworks and reporting that promotes data integrity, enables transparent communication & continuous improvement.

## 4. Policy Objectives

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Cromwell, where practicable, will demonstrate its commitment to water conservation principles by:

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- setting and publicly reporting against water intensity consumption targets
- employing maintenance practices that meet local laws and best practice requirements
- promoting best practice monitoring of water consumption to ensure efficient water use
- the introduction of high efficiency, low water consuming devices in retrofit, refurbishment and replacement works
- promoting rain water harvesting and the use of non-potable water options
- avoiding the use of external irrigation systems and promoting the implementation of drought tolerant landscaping
- developing procurement practices which comply with Cromwell's sustainability objectives
- fostering an organisational culture (including training and education) that promotes water conservation and the reduction of effluent
- engaging with stakeholders to encourage best practice
- developing and maintaining our environmental and procurement frameworks to provide continuous improvement,
- benchmarking against relevant local indices

## 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 water 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.