



# Investor Relations Policy

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**CROMWELL PROPERTY GROUP**

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Cromwell Corporation Limited ABN 44 001 056 980

Cromwell Property Securities Limited ABN 11 079 147 809

# Investor Relations Policy

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## 1. Introduction

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- a) Cromwell Property Group (Cromwell or Group) comprises Cromwell Corporation Limited (CCL) and the Cromwell Diversified Property Trust (Trust) (the responsible entity of which is Cromwell Property Securities Limited (CPS)), and subsidiaries of those entities. The units in the Trust are stapled to ordinary shares in CCL and trade jointly on the Australian Securities Exchange (ASX) as Cromwell Property Group stapled securities (ASX:CMW).
- b) Under the ASX Listing Rules, a listed entity must continuously disclose price sensitive information to the market. Price sensitive information is information that a reasonable person would expect to have a material effect on the price or value of an entity's securities.
- c) The disclosure obligation is given legislative force under the *Corporations Act 2001* (Cth) (Corporations Act).
- d) Cromwell is committed to complying with the continuous disclosure obligations contained in the ASX Listing Rules and the Corporations Act.
- e) This Policy was prepared with regard to Principle 5 (Make timely and balanced disclosure) and Principle 6 (Respect the rights of securityholders) of the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (3<sup>rd</sup> edition) and is referred to in Cromwell's Corporate Governance Statement.
- f) This Policy should be read in conjunction with Cromwell's Market Disclosure Protocol.

## 2. Objective

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The purpose of the Policy is to:

- a) communicate effectively with all securityholders;
- b) give all securityholders easy and timely access to balanced and understandable information about Cromwell;
- c) ensure that securityholders can easily participate in general meetings and are encouraged to do so; and
- d) detail how questions about Cromwell from securityholders will be dealt with.

## 3. Application of the Investor Relations Policy

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The Investor Relations Policy is subject to annual Board review and approval.

The Policy applies to all Directors of Cromwell and its subsidiaries as well as officers, employees and consultants of the Group and its subsidiaries.

## 4. Methods of communication

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Information will be communicated to securityholders through the following ways:

### 4.1 ASX announcements

All price sensitive information is released to the ASX before being distributed to the wider market.

All announcements and other information released to the ASX will be placed on Cromwell's website ([www.cromwellpropertygroup.com](http://www.cromwellpropertygroup.com)) as soon as practicable after release to the ASX.

### 4.2 Website

Cromwell's website, [www.cromwellpropertygroup.com](http://www.cromwellpropertygroup.com), is the primary tool to communicate rapidly with securityholders, and acts as a source of meaningful and current information about the Group.

Cromwell will place on its website all ASX announcements and relevant news releases and any other information that is an official release of material information to the market as soon as reasonably practicable after such information is released to the ASX.

### 4.3 Email

Securityholders may elect to receive securityholder communications from Cromwell via email. Securityholders can register for this service by contacting the Group's registry – Link Market Services Limited – at the details listed on Cromwell's website at [www.cromwellpropertygroup.com/contact](http://www.cromwellpropertygroup.com/contact). Registered securityholders will receive an email advice with a link to the relevant part of the Cromwell or registry website when distributions are paid, annual reports and annual updates are released and when notices of meeting and other securityholder communications are sent.

A securityholder may change their communication election at any time by revisiting [www.linkmarketservices.com.au/corporate/home](http://www.linkmarketservices.com.au/corporate/home) and following the instructions.

It is the responsibility of the securityholder to maintain a current email account and email address and to notify Cromwell's registry – Link Market Services Limited – of any changes to these details.

### 4.4 Post

Cromwell regularly communicates with securityholders via post and will continue to do so where a securityholder has not elected to use an electronic form of communication.

## 4.5 Meetings

Cromwell holds an annual general meeting (AGM) of its securityholders each year. Cromwell provides live webcasting of its AGM so that securityholders can hear proceedings online if they are unable to attend the meeting in person.

## 4.6 Cromwell's Investor Services Team

Cromwell's Investor Services Team is primarily retail investor focussed. Investors can email or call to speak with a Cromwell representative to ask questions or lodge a complaint about Cromwell.

## 5. Types of communication

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### 5.1 Price sensitive disclosures

These relate to any information which may have an influence on the security price of Cromwell and is a requirement of all ASX-listed entities.

### 5.2 Corporate governance announcements

Examples of corporate governance announcements include director disclosure forms (Appendices 3Y, 3X and 3Z), announcements relating to the issue of new securities (Appendix 3B) and Appendices to financial results announcements (Appendices 4E and 4D). These types of communication are a requirement of the Corporations Act.

### 5.3 Statutory requirements

This includes financial results for the half year dated 31 December (reported in February each year). The financial results for the full year ended 30 June are reported in August each year. The half year and full year results are announced to the ASX pursuant to the ASX Listing Rules and as required by the Corporations Act.

### 5.4 Annual Report

The Annual Report contains key financial information about Cromwell, as well as important operating and corporate information, and will be released via the ASX announcements platform and made available online at [www.cromwellpropertygroup.com](http://www.cromwellpropertygroup.com).

The Annual Report will be available to all securityholders prior to the AGM and within the timeframe set by the Corporations Act.

Cromwell Property Group securityholders can elect (via Cromwell's registry – Link Market Services Limited) to be notified by email when the Annual Report becomes available online.

Securityholders do not receive a printed copy of the Annual Report unless an election is made with Cromwell's registry – Link Market Services Limited. If an election is made, the securityholder will receive the printed copy free of charge.

## 5.5 Insight magazine

Insight is Cromwell's magazine which is published for securityholders and other stakeholders. Insight is distributed quarterly and features Cromwell's views on the Australian property market, news, education and industry trends. Cromwell also shares its achievements and reports on the progress of each of its investment funds.

Insight is available at [www.cromwell.com.au/insights](http://www.cromwell.com.au/insights).

## 5.6 AGM

Cromwell's AGM is held in Brisbane. At the discretion of the Board, general meetings may at times be held at other locations.

Prior to the AGM, securityholders will be provided with a Notice of Meeting outlining the resolutions to be voted upon. This will be sent to securityholders in electronic or printed form (as elected) within the timeframe set by the Corporations Act. This material relating to the AGM will be released via the ASX announcements platform and made available on the Cromwell website.

A proxy form, allowing securityholders to appoint a proxy in the event they cannot attend the AGM, will accompany the Notice of Meeting.

At the AGM, securityholders are encouraged to participate and ask questions. Cromwell will also ensure that the external auditor is in attendance to answer any applicable securityholder questions.

The Chairman's presentation will be released to the ASX just prior to the commencement of the AGM and will be made available to securityholders in the same manner as other ASX announcements.

## 5.7 Analyst, institutional investor and media briefings

Analyst and media briefings will generally be conducted at the time of release of half year and full year results. Such briefings may also be conducted at other times throughout the year. Where practicable, such briefings will be recorded. Links to any recording along with any materials distributed will be posted to the Cromwell website as soon as practicable after they are finalised.

Institutional investor meetings, site visits and one-on-one briefings with institutional investors or analysts may be held from time to time. At those meetings, Cromwell will not disclose any information that a reasonable person might regard as being price sensitive unless such information has previously been released to the market through the ASX or is otherwise already in the public domain.

## 5.8 Distribution statements

Securityholders will receive statements each quarter outlining their distribution entitlement.

## 5.9 Sustainability Report

Cromwell's Sustainability Report is prepared annually and made available on the Cromwell website at [www.cromwellpropertygroup.com/sustainability/performance-and-approach](http://www.cromwellpropertygroup.com/sustainability/performance-and-approach).

## 5.10 Annual securityholder survey

Each year, Cromwell surveys a random sample of retail securityholders to seek their feedback on the performance of Cromwell. This survey is conducted online and participation is voluntary. A summary of the results is published in the Sustainability Report and feedback is used to continually improve the operation of the business.

Cromwell utilises this survey to engage with securityholders – a key stakeholder group – about their expectations about Cromwell's economic, social and environmental performance. The feedback is used to help strengthen Cromwell's sustainability reporting, ensuring the needs of Cromwell's stakeholders are considered.

## 6. Handling questions / complaints

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### 6.1 Questions

Questions from retail securityholders will be handled by Cromwell's Investor Services Team, while institutional securityholder questions will be handled by the Manager – Strategy and Investor Relations.

Where Cromwell's Investor Services Team is not able to answer a question, they will refer the question to the Manager – Strategy and Investor Relations for the appropriate response for the securityholder.

In responding to questions, Cromwell will ensure that no price sensitive or confidential information is passed on to the securityholder, and all of Cromwell's statutory and ASX responsibilities on information disclosure are maintained.

### 6.2 Complaints

Complaints about Cromwell are handled under the Cromwell Complaints Handling Policy.

In short, complaints should be acknowledged immediately and addressed promptly according to their urgency. Complainants should be treated courteously and kept informed of the progress of their complaint throughout the resolution process.

Each complaint should be addressed in an equitable, objective and unbiased manner through the resolution process. Access to the complaints handling process will be free of charge for the complainant.

The Dispute Resolution Officer is ultimately responsible for the management of a complaint. The Compliance Manager is responsible for monitoring the complaints handling process, for maintaining the Complaints Register and for reporting to the Compliance Committee and the Board (via the Compliance Committee) at each meeting.

All complaints will be recorded in the Complaints Register. The Compliance Manager will conduct an annual review of the register to identify any systemic issues and to help eliminate the underlying causes of complaints. A report on the review and any recommendations will be given to the Compliance Committee and the Board (via the Compliance Committee).

## **7. Access to this Policy**

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This Policy will be available for viewing on Cromwell's website.

## **8. Policy breaches**

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If an employee or Director breaches this Policy, s/he may face disciplinary action, including dismissal in serious cases.

## **9. Questions**

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Any questions about Cromwell Property Group's Investor Relations Policy should be referred to the CEO or the Company Secretary.

## **10. Review and changes**

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The Company Secretary will review this Policy as often as necessary, but no less than annually. It will be reviewed to take into account ongoing feedback from securityholders and the results of the annual securityholder survey.

The Board may change this Policy from time to time by resolution.

## **11. Approved, adopted and reviewed**

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This Policy was approved and adopted by the board on 29 July 2015.

The Policy was last reviewed in September 2018.