

Policy

Title: Human Rights Policy

1. Purpose

The purpose of this policy is to define the Cromwell Property Group (Cromwell) approach to managing, promoting and preserving human rights across business operations and supply chains.

2. Scope

Respecting human rights is integral to Cromwell's values and culture. This policy outlines the rights and obligations of both internal and external stakeholders, including employees, contractors and suppliers of goods or services.

3. Policy Commitments

Cromwell supports the protection of human rights, the upholding of ethical labour practices in our work force and supply chains, and the provision of controls to avoid corruption in all its forms. In managing business operations and supply chains, Cromwell commits to:

1. Support and respect the protection of internationally proclaimed human rights, including:
 - UN Guiding Principles on Business and Human Rights; and
 - The International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work.
2. Uphold the elimination of all forms of forced and compulsory labour;
3. Uphold the effective abolition of child labour;
4. Engage and support external stakeholders to encourage adoption of the above commitments.

These fundamental principles of human rights are integrated throughout business practices to protect the rights of both internal and external stakeholders, as shown in Figure 1.

4. Policy Framework

The policies shown in Figure 1 of this document create a framework which acts to ensure a consistent approach throughout the organisation to deliver:

- Compliance with legislative provisions relating to the protection of human rights, fair labour practices, and the prevention of Modern Slavery practices in supply chains
- Compliance with relevant legislation in relation to the occupational health & safety of both internal and external stakeholders
- Ongoing human rights training to internal stakeholders to ensure awareness of fair labour practises, including rights and obligations in relation to whistleblowing, anti-corruption, modern slavery and diversity and inclusion
- Continuous development of suppliers of goods and services to encourage participation in human rights training and relevant industry initiatives
- An organisational culture that actively promotes responsibility for management of human rights issues in all aspects of business activities and the development of associated risk mitigation and remediation strategies
- Sustainability and governance frameworks which enable reporting and complaints handling that promotes integrity, enables transparent communication, disclosure and remediation
- Continuous improvement of processes, systems and controls to achieve the objectives of this framework and associated policies

This framework is developed and approved at a Group level and applied through local policies and procedures to ensure compliance with regional jurisdictions.

Figure 1:

| Associated Policies | FUNDAMENTAL HUMAN RIGHTS PRINCIPLES | | | | | | | | | |
|--------------------------------------|-------------------------------------|-------------------------------|-------------------|-----------------------------|----------------------------------|---|--------------------|---------------------------|------------------|----------------------------|
| | Freedom of opinion and information | Right to freedom from slavery | Right to equality | Freedom from discrimination | Right to a safe work environment | Right to organise and collective bargaining | Right to education | Right to rest and leisure | Right to privacy | Right to fair remuneration |
| Supplier Code of Conduct | | | | | | | | | | |
| Whistle-blower Policy | | | | | | | | | | |
| Procurement Policy | | | | | | | | | | |
| Equal Opportunity Policy | | | | | | | | | | |
| Diversity Policy | | | | | | | | | | |
| Workplace Health & Safety Policy | | | | | | | | | | |
| Learning & Development Policy | | | | | | | | | | |
| Flexible Working Arrangements Policy | | | | | | | | | | |
| Privacy Policy | | | | | | | | | | |
| Investor Relations Policy | | | | | | | | | | |

Scope Key:

| |
|---|
| Internal Stakeholders: aims to protect and promote the rights of internal stakeholders including both casual, permanent, and contracted staff and board members |
| External Stakeholders: aims to protect and promote the rights of external stakeholders including investors, suppliers, and the communities in which we operate |

5. Reporting

Cromwell is dedicated to protecting human rights and ethical practices across our operations and reports under Modern Slavery legislation where regionally applicable (including within Australia and the UK). Cromwell will continue to investigate opportunities for continuous improvements in this field and publicly report on progress against benchmarks, targets and industry metrics (as appropriate), including within the annual Sustainability Report.

6. Grievance Mechanisms

Any breach of this policy will be documented in accordance with the Breach Reporting Policy. The Whistleblower Protection Policy outlines the protections available to eligible whistleblowers. Should you have any concerns with regard to compliance with this policy, please report to governance@cromwell.com.au.

7. Management Approval

Development and review of this policy is the responsibility of the Chief Sustainability Officer. This policy has been approved and endorsed by the Global Leadership Team. The Policy will be reviewed considering legislation, benchmarking, reporting and organisational changes and development in sustainability best practice, at least annually. Where material changes are noted the Policy will be referred to the Global Leadership Team for approval.