



Enterprise Risk Management Policy

CROMWELL PROPERTY GROUP

Cromwell Corporation Limited ABN 44 001 056 980

Cromwell Property Securities Limited ABN 11 079 147 809

Cromwell Funds Management Limited ABN 63 114 782 777

Cromwell Real Estate Partners Pty Ltd ABN 23 152 674 792

Cromwell European Holdings Limited Company Number 938 1845

Enterprise Risk Management Policy

1. Objective

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).

The Board of Directors of Cromwell understands that identifying and managing risk is central to the successful delivery of the Group's strategy.

The Board has adopted this Enterprise Risk Management Policy, which is a general statement of Cromwell's approach to proactive, enterprise wide risk management.

2. Enterprise risk management at Cromwell

At Cromwell, enterprise risk management is embedded in the day to day management of the business and aligned to the achievement of Cromwell's business objectives.

Cromwell's Enterprise Risk Management Policy and Framework promote an understanding of risk and the opportunities to manage those risks for the benefit of our securityholders and other stakeholders.

The key benefits of enterprise risk management are to:

- embed the identification and management of risk as a central part of planning and analysis;
- balance risks and business objectives when developing risk treatment plans;
- capture Cromwell's accumulated experience of managing business risks to the benefit of the business now and in the future;
- provide the Board and management with confidence that Cromwell's business risks have been identified and are being effectively managed;
- provide opportunities to improve cost management by implementing more targeted and effective risk management and control processes; and
- provide efficient allocation of resources and management activity to manage risk objectives.

The Board of Directors is responsible for ensuring that an appropriate risk management framework is in place and setting the risk appetite within which the Board expects management to operate.

The Audit and Risk Committee helps the Board achieve its objectives in relation to risk management. The Committee oversees the Enterprise Risk Management Framework, including the establishment, implementation and supervision of risk management practices across the Group.

Led by the Chief Executive Officer/Managing Director, the Group Leadership Team is responsible for ensuring that there is a robust system of risk management consistent with this Policy embedded across the Group and that the Group operates within the risk appetite set by the Board.

Cromwell Property Group's approach to enterprise risk management is guided by relevant International Standards and regulatory guidance and the ASX Corporate Governance Council's *Corporate Governance Principles and Recommendations (4th edition)*.

3. Review and changes to Policy

The Audit and Risk Committee reviews the Enterprise Risk Management Policy at least annually to satisfy itself that the Policy continues to be sound. The Audit and Risk Committee makes recommendations to the Board in relation to any required changes.

The Policy was last reviewed by the Audit and Risk Committee in March 2021.

4. Approved and adopted

The Enterprise Risk Management Policy was approved by the Audit and Risk Committee on 29 April 2009 and adopted by:

- a) the Board of Cromwell Property Group on 29 April 2009;
- b) the Board of Cromwell Funds Management Limited on 21 October 2009;
- c) the Board of Cromwell Real Estate Partners Pty Ltd on 6 March 2012; and
- d) the Board of Cromwell European Holdings Limited in June 2017.

The Boards approved the Enterprise Risk Management Policy (following annual review) in June 2021.