

Policy

Title: Climate Change Position Policy

Version 6

Effective Date 27 March 2019

1. Purpose

The purpose of this Policy is to define Cromwell Property Group's ('Cromwell'; 'we, our, us') approach to assessing, reporting and managing the risk of, and potential financial implications from Climate Change to the organisation.

Cromwell recognises the risks and opportunities associated with a changing climate, and the transition to a zero-carbon economy.

To address this, we have sought to adopt the Financial Stability Board's Task Force on Climate-Related Financial Disclosure (TCFD) recommendations.

2. Scope

This Policy applies to the Cromwell Property Group.

3. Policy Statement

Cromwell acknowledge that disclosure improves the understanding of our key stakeholders to the material physical and transitional risks associated with climate change across our assets and our wider business operations.

In order to understand the impacts of physical and transitional climate change risks, we are committed to embedding risk management and resilience assessments within our acquisitions and operational strategies to support the appropriate allocation of capital and procedures that deliver climate resilient assets and operations.

4. Policy Objectives

The objective of this policy is to support the implementation of effective processes to identify and manage the organisation's financial exposure to climate related risk.

Cromwell will:

- Implement a robust risk management framework to support Cromwell's activities. This will include taking into consideration different climate related scenarios, including testing the resilience of the organisation against the impacts likely to occur from a 2°C rise in global temperatures.

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- Engage with stakeholders likely to be impacted by the identified social and environmental change shocks and stressors.
- Remain open to continuous improvement.

5. References

5.1 Legislation

Any relevant Country, County, State, Territory and Municipality legislation in relation to Financial Reporting and Auditing, Sustainability, Environmental Protection, Climate Change and Response etc.

5.2 Benchmarking Codes and Guides

Any relevant Benchmarks, Codes and Guides, including:

- FSB Task Force on Climate-Related Financial Disclosure (TCFD) recommendations.
- CDP (formerly the Carbon Disclosure Project)
- Local financial reporting and audit Standards
- Local climate change response requirements

6. Delegation of Authority

The Board have delegated authority for environmental, social and governance (ESG) topics to the Chief Executive Officer (CEO) who has appointed the Chief Sustainability Officer (CSO) for oversight of Cromwell's sustainability strategy, and for reporting on sustainability matters.

7. Management Approval

This Policy has been approved and adopted by the Board. The Policy will be reviewed considering legislation, benchmarking, reporting and organisational changes and developments in sustainability best practice, at least annually. Where material changes are noted the Policy will be referred to the Board for approval.