

Policy

Title:	Greenhouse Gas (GHG) Emissions Management Policy
Effective From	1st July 2018
Version	9

1. Purpose

The purpose of this policy is to define the Cromwell Property Group (Cromwell) approach to managing greenhouse gas emissions (emissions).

2. Scope

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 the adoption of emission management best practice.

For real estate assets where Cromwell does not have operational control, we will seek to engage with our tenants and encourage them to share consumption data and to support them in adopting emissions management and reduction strategies. .

3. Policy Statement

Cromwell's commitment to emissions management is to undertake, where practicable, activities in a best practice sustainable manner. Cromwell is committed to:

- minimising emissions;
- fulfilling its' health and safety obligations, with all reasonable measures taken to remove, mitigate and monitor risks;
- fostering an organisational culture that encourages emissions reducing behaviour within Cromwell and across relevant Cromwell stakeholders;
- developing and maintaining environmental management systems and practices that support data integrity, transparent disclosure and continuous improvement.

4. Policy Objectives

Cromwell will demonstrate its commitment to its emissions management principals by ensuring, where practicable, that it:

- sets interim annual targets for GHG reductions;
- incorporates risk management and workplace health and safety best practice in emissions management;
- fosters an organisational culture that promotes best practice emissions management;
- engages stakeholders and encourages best practice emission management behaviour;
- develops and maintains environmental frameworks and reporting that promotes data integrity, transparent communication & continuous improvement.

5. Management Approach

Manages emissions in line with the central aim of the Paris Agreement. Our emissions reduction commitment is to manage direct and indirect sources of emissions, targeting the following areas in order of priority:

Management Approach	Emissions Source
Avoid, minimise and offset	Direct Operations
Avoid and minimise	Asset Management (Scope 1 & 2 emissions)
Influence and support	Indirect Emissions (Scope 3)

6. Governance and Responsibilities

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 GHG emission 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.