



# Investor Relations Policy

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**CROMWELL PROPERTY GROUP**

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Cromwell Corporation Limited ACN 001 056 980

Cromwell Property Securities Limited ACN 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 reflects the ASX Corporate Governance Council's *Corporate Governance Principles and Recommendations (4<sup>th</sup> edition)*, is referred to in Cromwell's Corporate Governance Statement and 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) ensure that Cromwell has effective two-way communication with all Cromwell securityholders (institutional and retail) and other financial market participants;
- b) ensure that Cromwell gives all Cromwell securityholders and other financial market participants easy and timely access to balanced and understandable information about Cromwell's business, governance, financial performance and prospects;
- c) ensure that Cromwell securityholders can easily participate in general meetings and are encouraged to do so; and
- d) detail how questions from Cromwell securityholders about Cromwell 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. Contact details are 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](http://www.linkmarketservices.com.au) 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 will continue to communicate with a securityholder via post where the securityholder has not elected to use an electronic form of communication.

To assist Cromwell with its commitment to the environment and its focus on cost control, Cromwell encourages its securityholders to receive communications electronically.

Cromwell's Sustainability reporting outlines how initiatives like this are helping Cromwell become a more sustainable business. Cromwell's Sustainability Report is prepared annually and made available on the Cromwell website at [www.cromwellpropertygroup.com/sustainability](http://www.cromwellpropertygroup.com/sustainability).

## 4.5 Securityholder meetings

Cromwell holds an annual general meeting (AGM) of its securityholders each year and general meetings of its securityholders as required. Cromwell provides 'virtual' online participation through a platform provided by Cromwell's registry, Link Market Services Limited, so that securityholders can participate (including asking questions and voting online) if they are unable to attend the meeting in person

## 4.6 Investor relations

Cromwell's Investor Services Team is primarily retail investor focussed. Investors can contact a Cromwell representative to ask questions or lodge a complaint about Cromwell by calling Cromwell's Investor Services Team on 1300 268 078 (within Australia) or +61 7 3225 7777 (outside Australia) or emailing [invest@cromwell.com.au](mailto:invest@cromwell.com.au) or visiting [www.cromwellpropertygroup.com](http://www.cromwellpropertygroup.com) for more information.

Cromwell's Investor Relations Manager is institutional investor focussed. Investors can contact the Investor Relations Manager to ask questions or provide feedback about Cromwell by calling +61 7 3225 7777 or emailing [libby.langtry@cromwell.com.au](mailto:libby.langtry@cromwell.com.au).

Significant comments or concerns raised by investors or their representatives are conveyed to the Board and relevant senior executives.

## 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 and statutory requirements

Examples of corporate governance announcements include the corporate governance statement, director interest notices and the issue of new securities.

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

### 5.3 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.

To assist Cromwell with its commitment to sustainability and the environment and its focus on cost control, Cromwell encourages its securityholders to receive communications electronically.

Cromwell's Sustainability reporting outlines how initiatives like this are helping Cromwell become a more sustainable business. Cromwell's Sustainability Report is prepared annually and made available on the Cromwell website at [www.cromwellpropertygroup.com/sustainability](http://www.cromwellpropertygroup.com/sustainability).

## 5.4 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 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).

## 5.5 Securityholder meetings

Cromwell facilitates and encourages participation at meetings of securityholders, whether the AGM or any other general meeting of securityholders.

Cromwell's AGM and any other general meetings are held at the Group's registered office in Brisbane. At the discretion of the Board, meetings may at times be held at other locations. Securityholder meetings are held during business hours and at a location which is accessible by public transport and near paid carparking locations. The notice of meeting invites securityholders to join the Directors for morning tea or afternoon tea (as applicable) after the meeting.

Cromwell provides 'virtual' online participation through a platform provided by Cromwell's registry, Link Market Services Limited, so that securityholders can participate (including asking questions and voting online) if they are unable to attend the meeting in person.

Prior to the meeting, 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 (if elected) printed form within the timeframe set by the Corporations Act. This material relating to the meeting 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 meeting, will accompany the notice of meeting.

The Chair's address, the CEO's address and the meeting presentation materials will be released to the ASX before the commencement of the meeting and will be made available to securityholders in the same manner as other ASX announcements.

At the AGM, the Chair and the CEO each address the meeting and provide securityholders with an update on the Group's business, governance, financial performance and prospects and any areas of concern or interest to the Board and management. Cromwell will also ensure that the external auditor is in attendance to answer any applicable securityholder questions.

Securityholders are encouraged to participate and ask questions at securityholder meetings.

The notice of meeting for the AGM advises that securityholders entitled to cast their vote at the AGM may submit written questions to the auditor relevant to the content of the auditor's report or the conduct of the audit of the annual financial report being considered at the AGM, or otherwise may submit written questions about or comments on the management of the Group. A securityholder wishing to submit a question is asked to submit the question in writing to the Company Secretary in the timeframe specified in the noting of meeting. A list of the questions submitted is made available to securityholders attending the AGM at or before the start of the AGM. Where appropriate, these questions and comments are addressed at the meeting by being read out and then responded to at the meeting. At the AGM, the Chair reminds securityholders of the opportunity to ask questions, including questions about or comments on the management of the Group.

At all securityholder meetings, the Chair provides securityholders with an opportunity to ask questions about and discuss the specific resolutions put to the securityholder meeting. Resolutions are decided by a poll.

## 5.6 Analyst, 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, one-on-one briefings with institutional investors or analysts, and retail investor meetings and roadshows 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.

## 5.7 Distribution statements

Securityholders will receive statements each quarter outlining their distribution entitlement.

## 5.8 Sustainability Report

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

## 5.9 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 Investor Relations Manager and/or relevant senior executives.

Where Cromwell’s Investor Services Team is not able to answer a question, they will refer the question to the Investor Relations Manager and/or relevant senior executive 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 available on the Cromwell website at [www.cromwellpropertygroup.com](http://www.cromwellpropertygroup.com).

Cromwell will acknowledge a complaint within 24 hours (or one business day) of receiving it or as soon as practicable. Cromwell will investigate the complaint in an equitable, objective and unbiased manner. Cromwell will typically respond to a complaint within 30 calendar days of receiving the complaint unless the complaint is complex or there are circumstances beyond Cromwell’s control which are causing delays.

If the complainant is dissatisfied with Cromwell’s decision for the complaint, the complainant may refer the complaint to the Australian Financial Complaints Authority (AFCA), which is an external, independent and impartial ombudsman service of which Cromwell is a member.

## **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, they 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 November 2022.