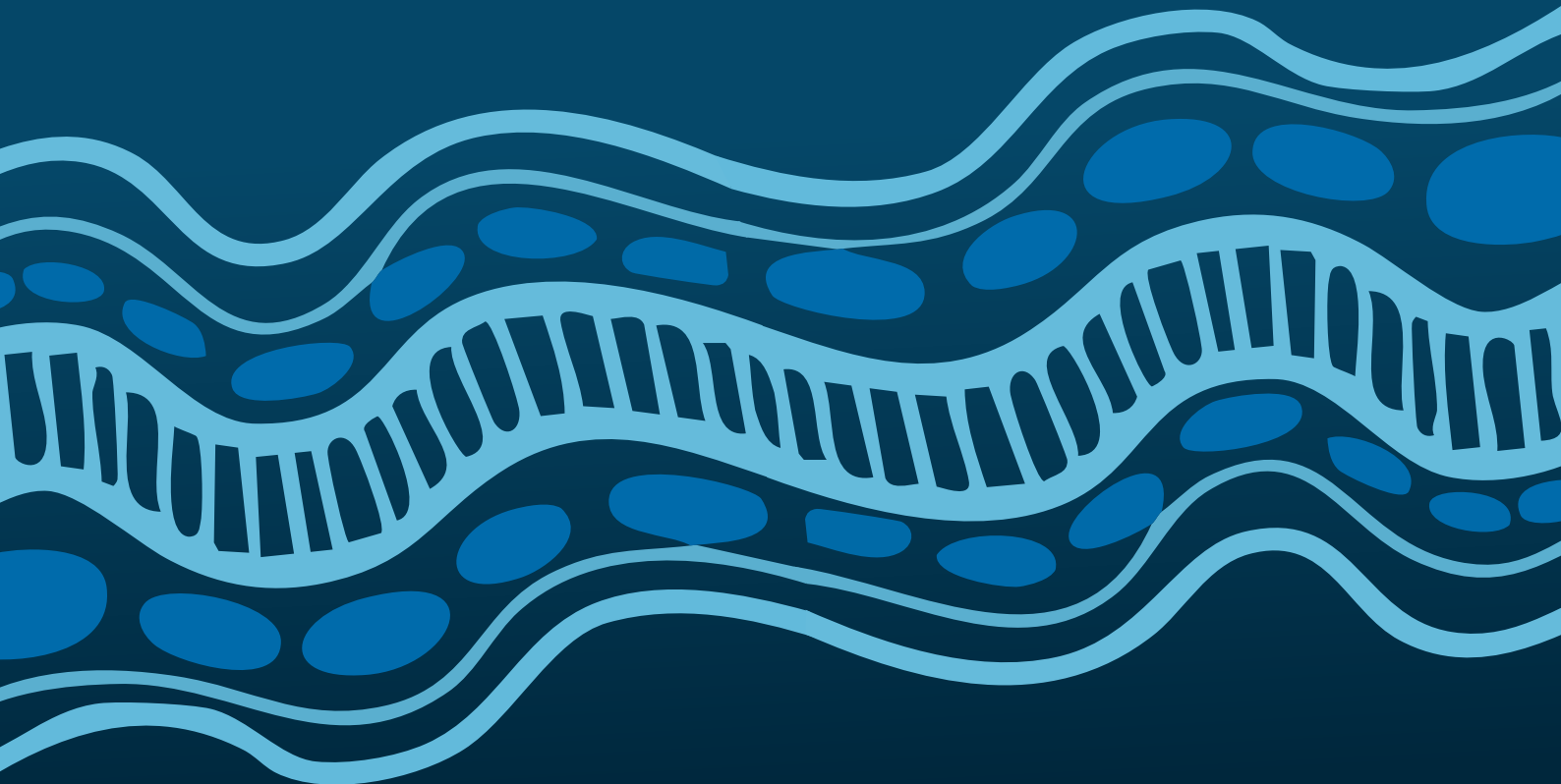




# Reconciliation Action Plan **Reflect**

August 2025 - December 2026



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RAP Framework





Cromwell Property Group acknowledges the Traditional Custodians of the lands on which we live, work, and operate. We honour the enduring connection of Aboriginal and Torres Strait Islander peoples to Country, culture, and community.

We pay our respects to Traditional Custodians and Elders past, present, and future and deeply respect the cultural, spiritual and educational practices of Aboriginal and Torres Strait Islander peoples.



**CROMWELL**  
PROPERTY GROUP

### **Cromwell Property Group**

Cromwell Property Group (Cromwell) is a real estate investment manager with A\$4.5 billion of assets under management in Australia and New Zealand.

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## Dungula

**Yorta Yorta word  
for River -  
River Dreaming**

Emma Bamblett

Wemba Wemba,  
Gunditjmarra, Ngadjonji  
and Taungurung

Megan Van Den Berg

Dja Dja Wurrung, Yorta  
Yorta and Boon Wurrung

# About the artwork

This artwork represents Cromwell's reconciliation journey.

One of the main features of the artwork is the blue stream running across the centre which represents the Brisbane River. Within the river there is symbols of Connection which are represented by the small circles connected by the curved lines. They have dots around them to represent the many stories shared along the River by the mobs. The line work with the smaller lines and stones represents Cromwell's connections the River.

Behind the River is a large beige area reflecting on the surrounding lands of Meanjin (Brisbane). There are strong orange circles with curved lines making Connections to each other. Within these circles are stones which represents the vision of Cromwell. Each of the circles talk to the vision – trust, investment, transparency, authenticity and creativity.

To the left top corner of the artwork is buildings standing tall. These building represents Cromwell. Each building has artwork and symbols to highlight the many different places where Cromwell sits.

To the right in the teal section, there are figures of people across the artwork which represents the diverse workforce. Each figure is a different size and line work within them to represent the many different ages, Cultures and wisdom each person carries. In the background you will see circles with curved lines connecting. These are

the processes of engagement with staff and work from the RAP journey that everyone will take.

To the left side of the artwork where the green area is, are circles with straight lines joining. These lines share Cromwell's passion for Aboriginal Culture. The many circles are opportunities shared through events, art and engagement for Cromwell Staff.

On the bottom of the artwork is strong foundational hill formations in black with rock and line work. These highlight the strong engagement processes used to Connect to Traditional Owners, stakeholders and people when working across the lands.

## ABOUT KINYA LERRK

KINYA LERRK (Wemba Wemba for 'women coming together') is the collaboration of Aboriginal visual artists Emma Bamblett (Wemba Wemba, Gunditjmarra, Ngadjonji and Taungurung) and Megan Van Den Berg (Dja Dja Wurrung, Yorta Yorta and Boon Wurrung) who have a strong history of collaboration on design/arts based projects.

Kinya Lerrk focuses on using design and art to make homes and offices come alive with colourful designs which celebrate Aboriginal culture and respectfully acknowledge traditional owners of land.



# Letter from Reconciliation Australia

Reconciliation Australia welcomes Cromwell Property Group to the Reconciliation Action Plan (RAP) program with the formal endorsement of its inaugural Reflect RAP.

Cromwell Property Group joins a network of more than 3,000 corporate, government, and not-for-profit organisations that have made a formal commitment to reconciliation through the RAP program.

Since 2006, RAPs have provided a framework for organisations to leverage their structures and diverse spheres of influence to support the national reconciliation movement. The program's potential for impact is greater than ever, with close to 3 million people now working or studying in an organisation with a RAP.

The four RAP types — Reflect, Innovate, Stretch and Elevate — allow RAP partners to continuously develop and strengthen reconciliation commitments in new ways. This Reflect RAP will lay the foundations, priming the workplace for future RAPs and reconciliation initiatives.

The RAP program's strength is its framework of relationships, respect, and opportunities, allowing an organisation to strategically set its reconciliation commitments in line with its own business objectives, for the most effective outcomes.

These outcomes contribute towards the five dimensions of reconciliation: race relations; equality and equity; institutional integrity; unity; and historical acceptance.

It is critical to not only uphold all five dimensions of reconciliation, but also increase awareness of Aboriginal and Torres Strait Islander cultures, histories, knowledge, and leadership across all sectors of Australian society.

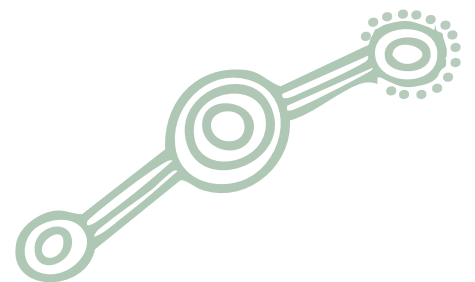
This Reflect RAP enables Cromwell Property Group to deepen its understanding of its sphere of influence and the unique contribution it can make to lead progress across the five dimensions. Getting these first steps right will ensure the sustainability of future RAPs and reconciliation initiatives, and provide meaningful impact toward Australia's reconciliation journey.

Congratulations Cromwell Property Group, welcome to the RAP program, and I look forward to following your reconciliation journey in the years to come.

## **Karen Mundine**

Chief Executive Officer

Reconciliation Australia



# Message from Cromwell



## Jonathan Callaghan

### Chief Executive Officer

Since forming our RAP Working Group in 2022, we've taken deliberate steps to build relationships, deepen cultural understanding of Aboriginal and Torres Strait Islander histories, cultures, and contributions and embed reconciliation into our business practices. From installing Acknowledgement of Country plaques and commissioning First Nations artwork, to engaging Indigenous suppliers and fostering respectful partnerships with local communities—we're proud of the progress we've made.

We've also invested in education, delivering cultural capability training to our executive team and RAP Working Group, and rolling out the SBS Inclusion Program to all staff. These efforts reflect our belief that reconciliation begins with awareness, empathy, and respectful collaboration.

This RAP will guide us through the next stage of our journey, as we continue to take thoughtful, practical steps—continuing to educate ourselves, strengthening our relationships with First Nations communities, and preparing our organisation for long-term, meaningful action through initiatives in cultural learning, employment and supplier diversity, governance, and community engagement.

I want to thank our RAP Working Group and everyone who has contributed to this important milestone. Together, we look forward to walking this path with humility, purpose, and a shared commitment to a more just and equitable future.



## Michelle Dance

### Chief Financial Officer

As Executive Sponsor of our Reconciliation Action Plan, I'm deeply committed to ensuring Cromwell plays a genuine and lasting role in advancing reconciliation with Aboriginal and Torres Strait Islander peoples. In real estate, our work is grounded — quite literally — in land. We operate on land that was never ceded, and our business is built on an ongoing relationship with Country.

That demands acknowledgement and respect for the deep, unbroken connection First Nations peoples have with these lands, a connection that has existed for tens of thousands of years and will continue long after our buildings are gone. This commitment also means embedding First Nations participation into how we do business. Setting clear targets for engaging First Nations suppliers ensures inclusion is part of the plan, not an afterthought, an approach that does not necessarily result in increased costs.

Even modest initiatives can deliver real impact. When Adidas funded a building-sized image of Mary Fowler on our 207 Kent Street asset during the World Cup, the donation went to the Moriarty Foundation to support Aboriginal and Torres Strait Islander children's participation in sport. It's a powerful example of how commercial activity can drive meaningful outcomes. It's not about spending more, it's about spending smarter and with purpose. For me, my role is about listening and learning with humility and helping ensure that our actions — not just our intentions — help build a more inclusive, equitable, and respectful future.



## Roxanne Ewing

### Chief Operating Officer

As an organisation with over 100 employees, we recognise and respectfully engage with the rich diversity of cultures across Australia, including Aboriginal and Torres Strait Islander peoples. We deeply value the profound knowledge First Nations peoples hold about Country, community, and sustainable stewardship. These insights offer invaluable lessons. With this RAP, we are committed to listening, learning and embedding reconciliation into the fabric of our organisation.

We will continue to focus on creating a workplace culture that is safe, inclusive and welcoming for Indigenous peoples. We want all of our people to feel a strong sense of belonging, and for Cromwell to be a place where cultural identity is respected and celebrated.

We have already begun the work of lifting our people's cultural capability and we will continue to invest in this journey through training, reflection and meaningful collaboration, one of our core values, with community. By acknowledging and learning about the histories, cultures and contributions of Aboriginal and Torres Strait Islander peoples, we aim to cultivate a culture where everyone can belong.

This Reflect RAP represents a dedication to building deeper understanding and relationships, showing genuine respect and creating opportunities that support the aspirations of First Nations communities. Reconciliation is a collective effort; I thank our RAP Working Group for their work to-date, and I invite all of our people to take an active role in this journey, to be curious, courageous and to contribute to a culture of respect and belonging.

19 George Street, Dandenong VIC



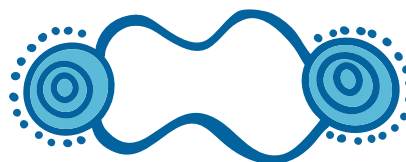
# Our business

## About Cromwell Property Group

Cromwell Property Group (ASX:CMW) is a real estate investment manager with A\$4.5 billion of assets under management in Australia and New Zealand. Cromwell is a trusted capital partner and fund manager to a range of global and local investors, capital providers and banking partners and has a strong track record of creating value and delivering superior risk-adjusted returns throughout the real estate investment cycle.

Cromwell manages relationships with more than 200 tenant customers with a fully integrated platform providing all investment needs. This includes funds and investment management, asset management (including leasing), and development and project management, all with a sincere commitment to Environmental, Social and Governance initiatives.

Cromwell employs approximately 130 staff in Australia. Our two main offices are situated on Yuggera (Brisbane) and Eora (Sydney) Lands, with satellite offices in assets on Kurna (Adelaide), Woiworung (Melbourne), Ngunawal (Canberra), Awabakal (Newcastle) and Bindal (Townsville) Lands. Currently, Cromwell employs one staff member who identifies as an Aboriginal and/or Torres Strait Islander person.



Cromwell Property Group is a 'values led' organisation, guided by our core values of accountability, progressiveness and collaboration.

### Our values

Cromwell Property Group is a 'values led' organisation, guided by our core values of accountability, progressiveness and collaboration, which underpin all our day-to-day business decisions. Developing a RAP aligns with these values. All employees are expected to act with integrity and inclusiveness and strive to enhance the reputation and performance of Cromwell Property Group. We are committed to acting respectfully and planning effectively for the long-term benefit of investors, our employees and wider communities.

### Our values



we are  
**accountable.**



we are  
**progressive.**



we are  
**collaborative.**

# Our RAP

Cromwell respects and values the 65,000-year histories that Australia's First Nations communities have with the land and waterways across Australia. We respect the deep cultural and spiritual significance the land holds in the identity of Australia's First Nations peoples. We believe that jointly, we can ensure the prosperity and protection of the lands on which Cromwell operates by sharing learnings through open and honest communication between the local groups who live on and operate businesses on these lands.

As part of our RAP, we include key elements from Cromwell's ESG strategy including the development of strategies to deliver resilient and sustainable assets. We believe that our reconciliation journey is inherently intertwined with Cromwell's wider business goals and community and environmental goals.

## Community conscious

Engaging and supporting the local communities in which we operate, or own property, is critical to providing Cromwell with a "social licence". Additionally, we recognise the importance of communities indirectly affected by our supply chain, to ensure our practises positively impact all stakeholders involved.

## Diversity, equity, and inclusion

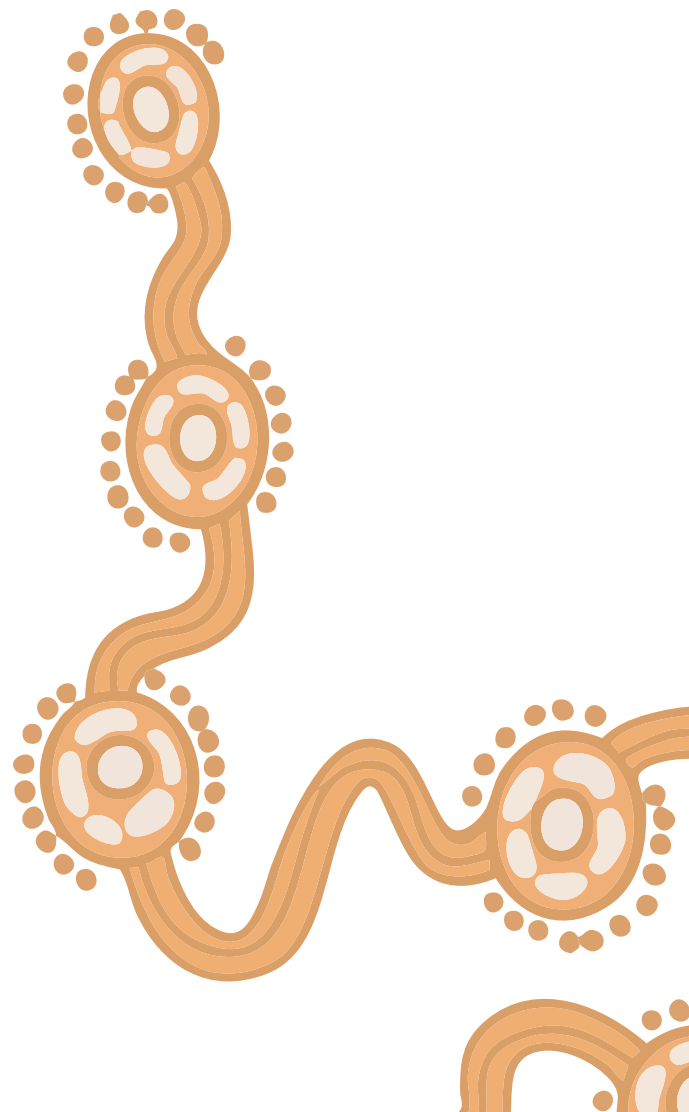
The benefits of diversity, equity and inclusion include an increase in unique viewpoints; new and better innovations; creative problem-solving; improvement in employee engagement and talent attraction; and challenging the status quo. Creating a diverse workforce and ensuring an equitable employment experience will support both talent attraction and retention, as well as corporate social responsibilities.

## Biodiversity and land management

Responsible environmental management through the protection of natural resources and the land on which our properties are located. Minimising the negative impact of our buildings and embracing new opportunities to positively impact the environment is critical to maintaining Cromwell's social licence to operate.

Building and fostering relationships with local First Nations communities will align Cromwell in the history of the places we manage. We believe that acknowledging and engaging with the Traditional Custodians of the lands on which our assets are built, will enable us to be able to best protect and sustain these areas over the longer term.

Whilst Cromwell already promotes an inclusive work environment, it is important to expressly differentiate inclusivity and safety for Australia's First Nations communities through our RAP and identified actions. We want to attract a diverse group of talented staff and foster a truly diverse group of employees at Cromwell and those associated with our Group.





## ESG VISION

Elevating real estate investment. Empowering our people. Delivering a resilient future for our investors, tenants, communities, and planet.

### ENVIRONMENT

Deliver resilient, revitalised, and sustainable asset portfolios that generate value and meet investor and other stakeholder expectations.

### PEOPLE

Create a culture of authenticity and creativity. Build capability and diversity. Nurture wellbeing.

### PLACES AND COMMUNITIES

Connect meaningfully to build authentic relationships. Generate value by meeting our tenants' evolving needs. Contribute positively to the communities we operate in.

### GOVERNANCE

Embed ESG across our business. Manage opportunity and risk by integrating environmental and social value in our decisions. Demonstrate accountability and transparency.

# Our RAP Working Group

Cromwell has established a RAP Working Group who will drive development, engagement and implementation of the RAP across the Group.

Members of the RAP Working Group include a champion representative from the Cromwell Executive Team, Michelle Dance, Chief Financial Officer, as well as committee members from a variety of other business areas such as People & Culture, Marketing, Funds Management, Property Management, Finance, and Development. There is one staff member who identifies as Aboriginal on the RAP Working Group.

The RAP Working Group is about making space for reconciliation every day.

**Rebecca Q.** RAP Working Group Co-Chair

The RAP Working Group has engaged the business to initially develop a RAP framework and will regularly review and update requirements to align with business growth. The RAP Working Group will assess, lead and manage engagement with Community Organisations and related Industry partners for business consultation, staff education and other key events.





## RAP Working Group

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### **Anne McKinnon**

Portfolio Asset Manager

### **Ash Lane**

People & Culture Business Partner

### **Fabiene Evans**

People & Culture Manager - Operations

### **Kylie Myles**

Funds Management Systems & Data Analyst

### **Libby Langtry**

Investor Relations Manager

### **Maria Frey**

Operations & WHS Manager

### **Marita Sweeney**

National Manager - Funds Management Operations

### **Michelle Dance**

Chief Financial Officer

### **Peter Gollagher**

ESG Manager

### **Rebecca Quade**

Marketing Lead - Brand and Property

### **Shantelle Davidson**

National Tenant Engagement Manager

### **True Swain**

Head of Project Management & Development

# Our journey

## RAP Working Group established

In 2022, Cromwell formed the RAP Working Group to explore ways to reflect and implement reconciliation. This group included representatives from different levels and departments.



### Key dates

Our RAP Working Group has delivered internal activities for NAIDOC Week and National Reconciliation Week and provided communications and initiatives to our tenant customers.



## Development milestones

Since establishing the RAP Working Group in September 2022, Cromwell has implemented initiatives to demonstrate the commitment to our reconciliation journey. We have introduced Acknowledgement of Country protocols at formal Group meetings and shared resources to encourage staff at informal meetings. Our Property Team engaged with a Melbourne-based Aboriginal owned business, Kinya Lerrk, to install acknowledgement plaques across all assets.



### Acknowledging asset lands

Partnering with Aboriginal-owned Kinya Lerrk to install Acknowledgement plaques across all properties.

207 Kent Street, Sydney NSW



### Enhancing development projects

As part of the 207 Kent Street lobby refurbishment, the projects team commissioned a striking feature artwork to honour connection to Country. 'Magalyinyara [Gadigal]'—a collaborative piece by Bunjalung artist Brad Turner and Gadigal artist Konstantina—translates to 'body decoration using clays or ochres' in the Gadigal language.



### Artwork and supplier diversity

We have introduced efforts to incorporate First Nations suppliers within the office and established employee targets on external contracts across our Development and Projects teams, which vary based on size and scale. In key projects, artwork has been commissioned to enhance and connect development projects. This includes artwork in the foyer refurbishment of 207 Kent Street, Sydney, End of Trip (EOT) artwork in Chesser House, Adelaide, and upcoming public art display at 400 George Street, Brisbane.



### Information and education

Providing information and resources to employees during key events and engagement activities including: NAIDOC Week, National Reconciliation Week, The Voice Referendum, Acknowledgement of Country and Welcome to Country, supplier diversity, and Indigenous Cultural Intellectual Property.

# Our partnerships

## Community partnerships

Early in FY24, Cromwell was named the principal sponsor of the Moriarty Foundation's 'Indigenous footballers call time on inequality' campaign. To coincide with the kick-off of the FIFA Women's World Cup 2023 in Australia and New Zealand, Cromwell made a \$20,000 donation to the Indigenous not-for-profit's fundraising drive for their John Moriarty Football (JMF) program.



### Contributions for the John Moriarty Football programme

In celebration of the FIFA Women's World Cup 2023, Cromwell proudly showcased Australian team players at 207 Kent Street, Sydney. Proceeds from the display supported the John Moriarty Football (JMF) program, helping to create opportunities for young Indigenous players.



### Working with our tenant community

In recognition of National Reconciliation Week 2025, the RAP Working Group collaborated with tenants at 540 Wickham Street to facilitate a tenant-led event. This initiative promoted respectful engagement and strengthened professional relationships across the building community.

## Internal activities/initiatives

### Education

We have completed face-to-face, cultural capability training through BlackCard for our executive team and RAP Working Group to engage and support with the implementation of our RAP. For the wider employee base, we have rolled out the SBS Inclusion Program including the First Nations modules to provide resources and education.

### Procurement

Engaging with First Nations owned businesses through procurement opportunities within new and existing projects and suppliers.

### Engagement

Fostering ongoing relationships with local First Nations organisations for new developments or redevelopments to ensure they are undertaken with care. We will ensure we have respect for the past and to collectively improve the built environment for future Australians.

# RAP Framework

## Relationships

Action	Deliverable	Timeline	Responsibility
1. Establish and strengthen mutually beneficial relationships with Aboriginal and Torres Strait Islander stakeholders and organisations.	Identify Aboriginal and Torres Strait Islander stakeholders and organisations within our local area or sphere of influence.	July 2026	Portfolio Asset Manager
	Research best practice and principles that support partnerships with Aboriginal and Torres Strait Islander stakeholders and organisations.	July 2026	Portfolio Asset Manager
	Continue already established relationships with Kinya Lerrk and BlackCard.	August 2025	Marketing Lead – Property & Brand
2. Build relationships through celebrating National Reconciliation Week (NRW).	Circulate Reconciliation Australia's NRW resources and reconciliation materials to our staff.	April – May 2026	Marketing Lead – Property & Brand
	RAP Working Group members to participate in an external NRW event.	27 May- 3 June, 2025	ESG Manager
	Encourage and support staff and senior leaders to participate in at least one external event to recognise and celebrate NRW.	27 May- 3 June, 2025	ESG Manager
	Continue to actively engage with tenant customers to distribute Reconciliation Australia's NRW resources and reconciliation materials.	May – June 2025	National Tenant Engagement Manager
3. Promote reconciliation through our sphere of influence.	Communicate our commitment to reconciliation to all staff.	August 2025	Chief Financial Officer
	Identify external stakeholders that our organisation can engage with on our reconciliation journey.	December 2025	Head of Project Management & Development
	Identify RAP and other like-minded organisations that we could approach to collaborate with on our reconciliation journey.	December 2025	Head of Project Management & Development
4. Promote positive race relations through anti-discrimination strategies.	Research best practice and policies in areas of race relations and anti-discrimination.	April 2026	People & Culture Manager - Operations
	Conduct a review of HR policies and procedures to identify existing anti-discrimination provisions, and future needs.	April 2026	People & Culture Manager - Operations



# Respect

Action	Deliverable	Timeline	Responsibility
5. Increase understanding, value and recognition of Aboriginal and Torres Strait Islander cultures, histories, knowledge and rights through cultural learning.	Develop a business case for increasing understanding, value and recognition of Aboriginal and Torres Strait Islander cultures, histories, knowledge and rights within our organisation.	October 2025	People & Culture Business Partner
	Conduct a review of cultural learning needs within our organisation with The BlackCard.	October 2025	People & Culture Business Partner
6. Demonstrate respect to Aboriginal and Torres Strait Islander peoples by observing cultural protocols.	Develop an understanding of the local Traditional Owners or Custodians of the lands and waters within our organisation's operational area.	December 2026	National Manager – Funds Management Operations
	Increase staff's understanding of the purpose and significance behind cultural protocols, including Acknowledgement of Country and Welcome to Country protocols.	December 2026	National Manager – Funds Management Operations
7. Build respect for Aboriginal and Torres Strait Islander cultures and histories by celebrating NAIDOC Week.	Continue to raise awareness and share information amongst our staff about the meaning of NAIDOC Week.	June 2026	Funds Management Systems & Data Analyst
	Continue to engage our staff to NAIDOC Week by promoting external events in our local area.	June 2026	Funds Management Systems & Data Analyst
	RAP Working Group to participate in an external NAIDOC Week event.	First week in July, 2026	ESG Manager
	Continue to actively engage with tenant customers to raise awareness and share information about NAIDOC Week.	June 2026	National Tenant Engagement Manager



# Opportunities

Action	Deliverable	Timeline	Responsibility
8. Improve employment outcomes by increasing Aboriginal and Torres Strait Islander recruitment, retention and professional development.	Develop a business case for Aboriginal and Torres Strait Islander employment within our organisation.	January 2026	People & Culture Business Partner
	Build understanding of current Aboriginal and Torres Strait Islander staffing to inform future employment and professional development opportunities.	January 2026	People & Culture Business Partner
9. Increase Aboriginal and Torres Strait Islander supplier diversity to support improved economic and social outcomes.	Develop a business case for procurement from Aboriginal and Torres Strait Islander owned businesses.	July 2026	ESG Manager
	Investigate Supply Nation membership.	October 2025	Operations & WHS Manager



# Governance

Action	Deliverable	Timeline	Responsibility
10. Establish and maintain an effective RAP Working Group (RWG) to drive governance of the RAP.	Maintain a RWG to govern RAP implementation.	July 2026	People & Culture Business Partner
	Draft a Terms of Reference for the RWG.	July 2026	ESG Manager
	Establish Aboriginal and Torres Strait Islander representation on the RWG.	December 2026	People & Culture Business Partner
11. Provide appropriate support for effective implementation of RAP commitments.	Define resource needs for RAP implementation.	August 2025	Marketing Lead – Property & Brand
	Engage senior leaders in the delivery of RAP commitments.	August 2025	Investor Relations Manager
	Maintain a senior leader to champion our RAP internally.	October 2026	Chief Financial Officer
	Define appropriate systems and capability to track, measure and report on RAP commitments.	August 2025	Marketing Lead – Property & Brand
12. Build accountability and transparency through reporting RAP achievements, challenges and learnings both internally and externally.	Contact Reconciliation Australia to verify that our primary and secondary contact details are up to date, to ensure we do not miss out on important RAP correspondence.	June annually	Marketing Lead – Property & Brand
	Contact Reconciliation Australia to request our unique link, to access the online RAP Impact Survey.	1 August annually	Marketing Lead – Property & Brand
	Complete and submit the annual RAP Impact Survey to Reconciliation Australia.	30 September, annually	People & Culture Business Partner
13. Continue our reconciliation journey by developing our next RAP.	Register via Reconciliation Australia's website to begin developing our next RAP.	September 2026	People & Culture Business Partner







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#### **Contact**

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