

Whistleblower Policy

Scope and Purpose

Investa Office Management Pty Ltd, through its related bodies corporate (together, Investa Property Group), provides a full service, end-to-end offering across funds management, portfolio and asset services, property services, development and sustainability. It also controls subsidiaries which are trustees or responsible entities of trusts or managed investment schemes (which include listed real estate property funds).

Recognising the expectations of security holders, employees, customers, regulators and the community, the Board of Investa Office Management Pty Ltd is committed to best practice in corporate governance, compliance and ethical behaviour generally. One of the principal responsibilities of the Board includes monitoring compliance with regulatory, ethical and prudential requirements.

A key test of the corporate governance health in the Investa Property Group is whether there are both formal and informal structures in place to enable good news and bad news to travel rapidly to the appropriate destination. This policy is an important mechanism in being able to satisfy that key test.

Investa Property Group encourages openness, integrity and accountability. Accordingly, the purpose of this policy is to provide everyone working at Investa Property Group with the means to raise concerns, freely and without fear of repercussions, regarding actual or suspected improper conduct – conduct that is dishonest, fraudulent, corrupt, illegal, in breach of law, unethical, an unsafe work practice or a breach of the Investa Property Group Code of Conduct.

All Investa Property Group Personnel

All Investa Property Group personnel are encouraged, and have the responsibility to report any known or suspected incidences of improper conduct by making a protected disclosure in accordance with this policy. Reports under this policy may be made anonymously and Investa Property Group will ensure that those persons who make a report shall do so without fear of intimidation, disadvantage or reprisal.

Personnel should, in the normal course and if the report is not made on an anonymous basis, first report such matters to their immediate manager. However, if he or she has a concern with that, (for example he or she reasonably believes that the manager is involved in the improper conduct), the report can be made to the Whistleblower Protection Officer at: whistleblower@investa.com.au. By way of an example, anonymous reports can be sent to the Whistleblower Protection Officer at whistleblower@investa.com.au.

The Whistleblower Protection Officer is the person that occupies the position of General Manager, People & Culture.

Alternatively, if the protected disclosure is an allegation made against the General Manager, People & Culture, then the Chief Executive Officer (CEO) should be notified or if the protected disclosure is an allegation made against the CEO, either the Whistleblower Protection Officer or the Chairperson of Investa Office Management Pty Ltd should be notified. If the General Manager, People & Culture (or the CEO) judges the protected disclosure to be of significance, the General Manager, People & Culture (or the CEO) must form a committee to investigate it further. The committee will be comprised of the following officers from Investa Property Group, namely the Chief Executive Officer, the Group General Counsel, the Chief Financial Officer and the General Manager, People & Culture. If the protected disclosure is an allegation made against a member of this committee, the committee member shall not be involved in the investigation.

The members of the committee will ensure that the investigation process is conducted fairly.

All Investa Property Group personnel also have an important responsibility concerning the welfare of the whistleblower within the organisation. All Investa Property Group personnel must refrain from any activity that is, or could be perceived to be, victimisation or harassment of a person who makes a protected disclosure.

The members of the committee will ensure that the investigation process is conducted fairly.

Investa Property Group will rectify any wrongdoing verified by the investigation, to the extent practicable in all circumstances.

All Investa Property Group personnel also have an important responsibility concerning the welfare of the whistleblower within the organisation. All Investa Property Group personnel must refrain from any activity that is, or could be perceived to be, victimisation or harassment of a person who makes a protected disclosure.

Confidentiality

All Investa Property Group personnel must take all reasonable steps to attempt to maintain the confidentiality of a person they know or suspect to have made a disclosure. Maintaining confidentiality is crucial in ensuring reprisals are not made against a whistleblower.

Managing the Welfare of the Whistleblower

Commitment to protecting whistleblowers

The Investa Property Group views all whistleblowing reports seriously and is committed to the protection of genuine whistleblowers against action taken in reprisal for the making of protected disclosures. Investa Property Group will protect the identity of the whistleblower to the extent permitted by law, and prohibits reprisals, discrimination, harassment or victimisation against any suspected whistleblower, their colleagues or relatives.

To the extent possible, whistleblowers can also request positive action to protect them. This may include relocation or a leave or absence during the investigation where it will not be possible to maintain the anonymity of the whistleblower.

Keeping the whistleblower informed

Investa Property Group will, to the extent possible, ensure the whistleblower is kept informed of action taken in relation to his or her disclosure.

Whistleblowers implicated in improper conduct

Investa Property Group acknowledges that the act of whistle blowing should not shield whistleblowers from the reasonable consequences flowing from any involvement in improper conduct. A person's liability for his or her own conduct is not affected by the person's disclosure of that conduct. However, in some circumstances, an admission may be a mitigating factor when considering disciplinary or other action.

Reports Prepared Pursuant to This Policy

Copies of reports prepared pursuant to this policy will be provided to:

1. the Chief Executive Officer; and
2. the Audit & Operational Risk Committee of IOMPL.

Subject to the disclosure of the report as outlined above, the report will be kept confidential and secure within the law. Investa Property Group will ensure that copies of reports will not be made available to persons against whom a protected disclosure has been made unless otherwise required by law.

Review of Policy

This policy will be reviewed periodically to ensure it complies with relevant laws and remains relevant and effective. This policy may be changed at the discretion of the Board of Directors of Investa Office Management Pty Limited.

Appendix – Definitions

1. Definitions

1.1 Whistleblowing

For the purpose of this policy, *whistleblowing* is defined as: "the deliberate, voluntary disclosure of individual or organisational malpractice by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated wrongdoing within or by an organisation that is within Investa Property Group's ability to control." Examples of improper conduct include conduct that is dishonest, fraudulent, corrupt, illegal, in breach of law, unethical, an unsafe work practice or a breach of the Investa Property Group Code of Conduct.

1.2 Whistleblower

For the purpose of this policy, a *whistleblower* is defined as: "any employee, director, related officer, customer, tenant or contractor of any member of the Investa Property Group of companies, who whether anonymously or not makes or attempts to make a disclosure as contemplated in this policy."

1.3 Improper Conduct

For the purpose of this policy, *improper conduct* is defined as: "conduct that would, if proven, constitute by a member of the Investa Property Group or its personnel to be:

- a. a contravention of a material legal obligation;
- b. a criminal offence;
- c. reasonable grounds for dismissing or dispensing with, or otherwise terminating, the services of Investa Property Group personnel who was, or is, engaged in that conduct; or
- d. reasonable grounds for disciplinary action."

1.4 Protected Disclosure

For the purpose of this policy, *protected disclosure* is defined as: "any good faith communication based on reasonable grounds that discloses or demonstrates an intention to disclose information that may evidence an improper conduct".

Policy Information

Responsibility: Legal & Company Secretariat

Date Last Reviewed: Approved by the IOMPL Board on 1 August 2017