

Enterprise Risk Management Policy

GDI Property Group ("GDI")
GDI Property Group Limited (ACN 166 479 189)
GDI Funds Management Limited (ACN 107 354 003)

Dated 27 June 2019

GDI Property Group

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Enterprise Risk Management Policy

1 Policy

The GDI Board recognises the importance of a pro-active enterprise wide risk management program and have adopted this Enterprise Risk Management Policy for GDI Property Group.

GDI Property Group's Enterprise Risk Management Policy and framework aim to promote increased risk awareness, improved stakeholder confidence and a minimisation of exposure to financial losses and earnings volatility.

Management will ensure that a supporting framework, consistent with Australian/New Zealand Standard AS/NZS ISO 31000 is in place. The supporting framework should clearly define responsibilities for managing risk under GDI Property Group's risk management process. All material risks impacting GDI Property Group's business, including operational, financial, legal and compliance risks are required to be regularly identified, managed, monitored and reported. Methods for treating and mitigating risks include avoiding or retaining and transferring, reducing, accepting or exploiting risks following assessment using a variety of methods.

While the Board retains ultimate responsibility for risk management throughout GDI Property Group, day to day responsibility for managing risk rests with GDI Property Group's management generally and the Risk Manager specifically.

Under the guidance of the Audit, Risk and Compliance Committee, GDI Property Group is committed to continually enhancing its risk management framework. The Audit Risk and Compliance Committee plays a key role in developing and building an approach to assist staff to identify, monitor and treat risk and is responsible for reporting material risks to the Board.

This policy and its supporting framework will allow GDI Property Group to:

- Capture GDI Property Group's accumulated experience of managing business risks:
- Provide the Board and management with confidence that GDI Property Group's business risks have been identified and are being effectively managed;
- Provide opportunities to improve cost management by implementing more targeted and effective risk management and control processes; and
- Provide efficient allocation of resources and management activity to enterprise risk management objectives.

The Board believes risks arise at every level of business, from the implementation of high-level strategies through to the physical security and safety of any working environment. The risks that GDI Property Group is exposed to will be regularly reviewed, including any material exposure to economic, environmental and social sustainability risks.

To facilitate monitoring and evaluation of the effectiveness of internal control and risk mitigation activities, GDI Property Group has established a Compliance Plan, various internal policies and procedures and risk management and compliance reporting systems to keep the Board informed of strategic, reputational, financial and operational risks. Monthly and quarterly management certifications confirm the appropriate internal controls and treatments are in place and that GDI Property Group's Enterprise Risk Management Policy, key guidelines, policies and procedures are being observed.

2 Review and changes to this Policy

The Enterprise Risk Management Policy and framework are reviewed at least annually by the Audit, Risk and Compliance Committee with the results to be reported to the Board. The aim of the review is to consider and assess the effectiveness of this policy and its supporting frameworks and to ensure their continued application and relevance.

3 Approved and adopted

This Enterprise Risk Management Policy was approved and adopted by the Board on 27 June 2019.