



Whistleblower Policy

**GDI Property Group (“GDI”)
GDI Property Group Limited (ACN 166 479 189)
GDI Funds Management Limited (ACN 107 354 003)**

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GDI Property Group
Level 23
56 Pitt Street
Sydney NSW 2000
Australia
T +61 2 9223 4222
F +61 2 9252 4821
www.gdi.com.au

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1. Objective

GDI Property Group is committed to promoting and supporting a culture of corporate compliance and ethical behaviour in which employees are responsible, accountable and behave with honesty and integrity and can raise concerns regarding unethical, unlawful or undesirable conduct, without fear of reprisal. This policy seeks to comply with Section 1317AI of the *Corporations Act 2001* and it incorporates ASIC's *Regulatory Guide RG 270*.

2. Purpose

This policy sets out the frameworks that have been established to encourage employees to report without fear of reprisal and with the support and protection regarding disclosable matters.

For a Whistleblower to qualify for protection under *Corporations Act*, the following criteria listed below apply:

As GDI is a body corporate, an eligible Whistleblower is an individual; spouse, relative or dependent who is, or has been, within any of the following categories:

- Current or Former employees - permanent, part-time, fixed term, temp, secondees, managers and directors
- Supplier of goods and services to GDI including their employees
- Associate of GDI

3. Disclosable Matters the Policy applies to

Based on GDI's business operations and practices, the types of wrongdoing that can be reported include:

- Illegal conduct;
- Conduct in breach of the *Corporations Act 2001* (Cth) or the *Australian Securities and Investments Commission Act 2001* (Cth);
- Matters that may cause financial or non-financial loss to GDI or damage the reputation of GDI;
- Unsafe work practices;
- Breaches of the Modern Slavery Act
- Fraudulent, dishonest or unethical conduct; or
- Any other conduct that is contrary to GDI's Code of Conduct, ("**Improper Conduct**").

Disclosures that are not about "disclosable matters" do not qualify for protection under the *Corporations Act*.

4. Scope

All GDI employees and Directors must comply with this Policy.

Employees making a report of disclosable matters will be kept informed of the outcomes of the investigation, subject only to the considerations of privacy of those against whom the allegations were made and customary practices of confidentiality within GDI.

Where it is found that an employee has knowingly or recklessly made a false report of disclosable matters, that conduct itself will be considered a serious matter.

8.1 Monitoring and reporting on Whistleblower disclosable matters

Internal reporting arrangements have been established to ensure that all verifiable Improper Conduct is dealt with appropriately, and systemic and recurring problems are identified and addressed.

The Company Secretary has a direct line of reporting to the Chief Executive Officer (“CEO”) and the Board.

9. Roles and Responsibilities

The Company Secretary is responsible for safeguarding the interests of the Whistleblower in terms of this policy, other GDI policies (e.g. Code of Conduct) and other applicable legislation, and for establishing a framework to support regular communication and the reinforcement of this policy.

Managers are responsible for ensuring that employees in their team are aware of and comply with this policy and notifying the Company Secretary if there is an emerging concern about compliance with this policy.

Employees are responsible for raising concerns they have regarding Improper Conduct with their Manager or through other reporting channels made available by GDI.

10. Further information

GDI’s expectations in relation to the reporting of disclosable matters are outlined as part of the new employee induction program and as part of ongoing training and awareness programs.

If you require additional information about this policy and / or have any questions, issues, concerns or suggestions for improvement to this policy, please contact the Company Secretary.

Trust means GDI Property Trust.

Trustee means GDI Funds Management Australia Ltd ACN 107 354 003.

Whistleblower means an Employee who alerts the Group and/or a regulatory authority to disclosable matters within the GDI Property Group.

Whistleblower Protection Officer means a person nominated by the GDI Property Group whose key responsibilities include protecting Whistleblowers who report concerns under this Policy.