

Australian Unity Investment Real Estate Limited

Whistleblower Protection Policy

Background

Australian Unity Investment Real Estate Limited (AUIREL, or the Company) is the Responsible Entity of the Australian Unity Office Fund (the Fund, or AOF). AUIREL is a wholly owned subsidiary of Australian Unity Keppel Capital Pty Ltd, a joint venture company owned equally by subsidiaries of Australian Unity Limited (AUL) and Keppel Capital Holdings Pte Ltd the asset management arm of Singapore-based Keppel Limited (Keppel Capital).

About this policy

It's important that our people feel supported and encouraged to speak up against actual or suspected improper conduct – no matter what the situation is. This policy helps us do this, outlining what it means to make a whistleblower report and an overview of the process involved.

The Whistleblower Protection Policy helps us to:

- manage and reduce the risk of improper conduct within or by the Company
- support all our current and former directors and executives to freely raise concerns about actual or suspected Reportable Conduct – without fear of repercussions
- reinforce and protect the values of the Company, and the principles of our Code of Conduct.

Who does the policy apply to?

- This policy applies to all 'Eligible Whistleblowers' defined as a current or former directors, officers, executives, contractors or volunteers of the Company
- a supplier of services or goods to the Company (paid or unpaid), or employed by someone (or employed by a related party) who supplies services or goods to the Company
- a relative or dependent of anyone who is employed by or supplies services or goods to the Company.

What conduct is covered by the policy?

The conduct covered by this policy is called Reportable Conduct. In relation to the Company, it's defined as conduct that an Eligible Whistleblower has reasonable grounds to suspect is:

- dishonest, fraudulent or corrupt behaviour (including bribery)
- illegal activity, including theft, drug sale or use, discrimination, violence, bullying, harassment or intimidation or criminal damage
- unethical or in breach of the Company's policies (such as dishonestly altering company records or data, Modern Slavery concerns within our supply chain, insider trading, insolvent trading, not managing conflicts of interest appropriately, adopting questionable accounting practices or wilfully breaching other policies or procedures)
- an activity which represents a danger to the public or the financial system
- potentially damaging to the Company, a director, executive, contractor or volunteer of

the Company, such as unsafe work practices, environmental damage, health risks or abuse of the Company's property or resources

- an abuse of authority
- misconduct or improper circumstances relating to tax affairs of the Company
- a contravention of laws relevant to the business and operations of the Company
- any conduct that may have serious negative impact on the Fund or the Fund's unitholders
- any conduct that may have serious negative impact on the Company's customers, members, employees, contractors, reputation, interests or financial position

Reportable Conduct usually relates to the conduct of suppliers and their employees, directors, executives, contractors or volunteers of the Company, but it can also relate to the actions of a third party, such as a customer, supplier or service provider of the Company.

What conduct isn't covered by the policy?

If there are any other conduct-related matters not listed above, they aren't covered by this policy and don't qualify for whistleblower protection. This includes personal work-related grievances about your employment or former employment, which you should report to your Manager or People & Culture representative.

However, if you have any personal work-related grievances which relate to Reportable Conduct, or which may be considered Detrimental Conduct resulting from a Whistleblower Disclosure, these will be covered by this Policy.

How can you make a report?

The process we have in place to make a Whistleblower Disclosure of Reportable Conduct allows for easy and safe reporting. It also includes the option of using an external reporting service.

To qualify for the whistleblower protections under this policy and the Corporations Act (or the Tax Administration Act, as applicable), you must make a report about Reportable Conduct to an 'Eligible Recipient'. An Eligible Recipient includes the following:

External Alert Service

We've established access to an external, independent Alert Service managed by Linchpin Legal Management Pty Ltd. We encourage you to make Disclosures via the Alert Service, which can be done either by:

- email on audisclosure@llm.net.au
- calling the Disclosure Hotline on 1300 794 250

Whistleblower Protection Officers

We've also appointed internal Whistleblower Protection Officers (WPO). They have specific responsibilities around receiving Disclosures and protecting the people who make them. The WPOs include:

- the Chair of the board of directors
- the Company Secretary

Other Eligible Recipients

You can also make a Disclosure to these Other Eligible Recipients:

- other directors of the Company
- a member of the executive team
- the external auditors

If you're reporting to Other Eligible Recipients, you can make the Disclosure in person or on the telephone. Either way, you must make it known that you're making a report under the Whistleblower Policy.

If you make Disclosures to the above Eligible Recipients, you'll qualify for protection. However, we prefer that you make them directly to the Alert Service or to the Whistleblower Protection Officers – so we can take action quickly.

If Other Eligible Recipients consider it appropriate, they may advise you to make your report to the external Alert Service or the designated WPOs.

Once you make a Disclosure to an Eligible Recipient, they'll:

- contact you quickly, acknowledge receipt and check on your wellbeing (if you've provided your name and/or contact details)
- put the right measures in place to support and protect you
- carry out preliminary inquiries to determine whether an investigation is possible and appropriate; and if so
- arrange for an investigator with the right experience, background, capability and independence to investigate your report.

We're committed to making sure Disclosures are managed in line with the policy and any other relevant laws, and that we provide all the required whistleblower protections. These protections include the following:

- You can choose to remain anonymous. However, we encourage you to disclose your identity so that we can better support you and ensure you get the right protections. It will also help us get further information about the report.
- If you choose anonymity, it's illegal for us to identify you – unless it's specifically required by law to do so externally.
- We'll protect your confidentiality by ensuring:
 - disclosures are handled and investigated by qualified staff
 - personal information is de-identified in reports relating to the Disclosure
 - all paper, electronic documents and other materials relating to the Disclosure are stored securely
 - only a restricted number of people who are directly involved in handling and investigating the report will be aware of your identity, provided you haven't requested anonymity
 - your identity will only be disclosed where have your consent, or where we're legally required to do so.
- If you make a Disclosure, you won't be subject to any 'Detrimental Conduct' for doing so. You're also protected from any civil, criminal and administrative liability that may result from making it.
- If you're an employee or contractor who threatens or engages in Detrimental Conduct

towards an Eligible Whistleblower, who has made or is about to make a Disclosure, you'll be investigated and possibly subject to disciplinary action.

- If you suffer loss, damage or injury because of a Disclosure and we've failed to take reasonable precautions, or exercise due diligence to prevent Detrimental Conduct, you're entitled to seek compensation and other remedies through the courts.
- If you're involved in the Reportable Conduct, making a Disclosure won't shield you from the consequences. However, your admission may be taken into account when considering disciplinary or other action.
- You should immediately notify one of the WPOs if you're concerned that you may be, are being, or have been subjected to Detrimental Conduct, or your Disclosure hasn't been dealt with in line with this policy.
- You can still qualify for these protections even if the Disclosure turns out to be incorrect.

You may also qualify for the whistleblower protections if you've:

- made a Disclosure directly to ASIC, APRA or another Commonwealth body prescribed by regulation¹
- made a Disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act
- made an emergency or public interest disclosure to a journalist or parliamentarian in line with the definition in the Corporations Act.

We make the following commitments in how we investigate and handle Disclosures:

- All investigations will be conducted in a fair and independent manner.
- The investigation process and duration will vary depending on the nature of the Reportable Conduct and the amount of information provided. We'll aim to investigate and resolve the matter as soon as practically possible.
- If you wish to remain anonymous, your identity won't be disclosed to the investigator or to any other person throughout the investigation.
- To avoid jeopardising an investigation, you must keep your report confidential and not tell anyone you've made one. Exceptions may include if you wish to obtain independent legal advice, access the Employee Assistance Program or seek support from your People & Culture representative or Manager.
- If you've made a Disclosure and haven't chosen to remain anonymous, you'll be kept informed on how the investigation progresses. How often you get these updates may depend on the nature of the Disclosure.
- Where a person is found to have engaged in misconduct, the matter will be dealt with in line with the Company's disciplinary procedures. Serious criminal matters will be reported to the police or other appropriate regulatory authorities.

¹ s.1317AA Corporations Act

- The type and number of Disclosures will be reported to the board. The name of the person making the disclosure won't be reported.
- The outcome of any investigations will be reported to the Board or its other Committees as considered appropriate and/or necessary.

We understand that making a Disclosure, or being involved in one, can be a stressful and emotional experience to manage and we can assist you to find extra support services. Please let one of the WPOs if you need this kind of assistance and we will put you in touch with suitable service providers.

This policy will be available on the Fund's website australianunityofficefund.com.au

This policy will be supported by training delivered to all who are required to be aware of the policy and the whistleblower protections available.

Policy breaches

If you fail to comply with this policy this could result in consequences for you and the Company.

Policy exemptions

To apply for an exemption to this policy, you'll need to submit a request to the Company Secretary.

Legal obligations

If you believe that you've got a legal obligation that's inconsistent with this policy, immediately report it to the Company Secretary, and comply with the higher of the standards.

Any questions?

If have any questions about the policy or whistleblower process, contact the Company Secretary or one of the nominated WPOs.

If you're a former director, executive, contractor or volunteer or external party, contact the external Alert Service

Policy Administration

Policy owner	Australian Unity Wealth & Capital Markets Governance
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Superseded Policy	Nil