

# Code of Conduct

Great companies are based on great values. They're what drive us. They're what set us apart.

Goodman has its own distinctive blend of values: **Performance** • **Drive**, **Open** • **Fair**, **Team** • **Respect**, **Innovative** • **Dynamic**, **Customer** • **Focus**. These values help to guide us in the way we think, act and behave; they reflect our commitment to our customers, partners and each other; and they challenge us to make the right decisions for all.

Our Code of Conduct is a natural extension of these values and is equally important. After all, the way we conduct ourselves is directly linked to our continued success.

We all need to read and adhere to the Goodman Code of Conduct. If we can commit to this while we live and breathe our values, I believe we will make our company truly great.

Greg Goodman, CEO, Goodman Group



## Why does Goodman have a Code of Conduct?

Wherever Goodman conducts business, maintaining our reputation, integrity and fair dealing is critical. Our Code of Conduct operates alongside our employee policies and sets the standard of professional and ethical behaviour that is expected from all those who represent us.

Our Code of Conduct has the full support of the Board and extends to all team members, directors, contractors and secondees of Goodman in the performance of their duties for Goodman. It is applicable in all locations around the world and compliance with it is crucial. Any breach can have serious consequences such as damage to Goodman's reputation, legal liability, and disciplinary action including termination of employment.

You have a responsibility to report any breaches of our Code of Conduct to your manager or Legal, Risk or HR executive in accordance with our Ethical Concerns Policy – even if you're not sure whether it is a breach. Significant breaches will also be reported to the Board.

## What are Goodman's guiding principles?

Within our Code of Conduct there is a set of eight guiding principles that help us uphold Goodman's reputation and do the right thing by our customers and other team members. Our guiding principles are:

1. Act in a professional manner.
2. Work as a team and respect others.
3. Treat stakeholders fairly.
4. Value honesty and integrity.
5. Follow the law and our policies.
6. Respect confidentiality and do not misuse information.
7. Manage conflicts of interest.
8. Strive to be a great team member.





These principles operate alongside our values, policies and procedures and everyone is expected to follow them when representing Goodman. Here's a little more detail about each one.

### **1. Act in a professional manner.**

We take responsibility for our professional conduct. When representing Goodman, we remain professional and ethical, and act in line with Goodman's values. We are always courteous, considerate, well-presented and act responsibly – whether we're in the office, at social functions, travelling on company business, or on social media.

### **2. Work as a team and respect others.**

We work as a team and we compete as a team. We promote a diverse environment where everyone can thrive. We value and respect our differences. We do not tolerate bullying, harassment, unlawful discrimination or any other offensive conduct. We are supportive and look after the health, safety and wellbeing of ourselves and those around us.

### **3. Treat stakeholders fairly.**

We understand how important it is to treat customers, suppliers, partners and other third parties fairly. We listen to them and we act promptly on all issues. We do what we say we'll do. Our word means something.

### **4. Value honesty and integrity.**

We base all our dealings on honest and ethical behaviour – whether it's with our customers, partners, team members or other external parties. We build trust by acting with integrity and accountability and doing what's right. We have zero tolerance for any unacceptable conduct such as theft, fraud or misuse of company assets. We have a responsibility to report any instances of unethical or unlawful conduct and co-operate with any internal or external investigations.

### **5. Follow the law and our policies.**

We comply with all our legal and regulatory obligations, including our Code of Conduct, employee policies and procedures. If there is any inconsistency in the law or regulation in our region then we automatically defer to the higher standard and raise the inconsistency with our manager. If ever we're unsure about which policies and procedures apply we speak with a Legal, Risk or HR executive. We understand if we fail to comply with laws and regulations, both Goodman and individual team members may face criminal sanctions or other serious consequences.

### **6. Respect confidentiality and do not misuse information.**

We respect all confidentiality and privacy laws. We do not misuse or disclose any confidential information concerning Goodman, or any confidential or personal information concerning our customers, partners, team members or other external parties, whether it be for a personal benefit or a benefit for others. We continue to respect these obligations even after we have left Goodman.

### **7. Manage conflicts of interest.**

We don't participate in any activities that involve a conflict between our personal interests and our duties and obligations to Goodman. We understand there are times when potential conflicts of interest do arise. When this is the case we disclose this information immediately so it can be properly managed.

The way we manage conflicts of interest are:

- + We immediately report any unethical or inappropriate behaviour by other team members or our customers.
- + We do not solicit, accept or offer money, gifts, entertainment, favours or bribes that might influence, or be seen to influence, business decisions.
- + We deal with Government officials with integrity and transparency and do not make political donations.
- + We do not trade in Goodman securities if we have obtained market sensitive information, or pass that information on to others.
- + We do not process our own transactions or those of our friends, relatives or business associates.
- + We keep accurate and transparent records of dealings with customers and suppliers.
- + We do not participate in activities outside our employment that could adversely affect our ability to carry out our duties and responsibilities to Goodman.
- + We seek approval before accepting a directorship role of a non-Goodman company.
- + We do not use funds, property or information belonging to Goodman or our customers for personal benefit, or help others to do so.

If you are unsure of whether you have a personal conflict of interest you are encouraged to speak with your manager, HR Legal or Risk Executive.

### **8. Strive to be a great team member.**

We value those who aspire to be great team members – people who apply their time efficiently to their role and adhere to this Code of Conduct, and its principles and live and breathe our values.