



# CODE OF CONDUCT

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

Goodman has its own distinctive blend of values: Innovation, Determination, Integrity, and Sustainability. These values reflect not only who we are today, but who we want to be, long into the future. Our values also 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 (Code) 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 follow the Code. You are also encouraged to speak up if something doesn't seem right.

If we can commit to this while we live and breathe our values, I believe we will make our company truly great.

James Spence, CEO, Goodman New Zealand

## Why does Goodman have a Code of Conduct?

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

## Who must follow our code?

**All of us. Our Code has the full support of the Board and extends to anyone who works for Goodman including:**

- a) Directors or Officers of Goodman
- b) Team members (full-time, part-time, and casual employees, or secondees) of Goodman
- c) Workplace participants (contractors and consultants) of Goodman
- d) All sites, operations, and business activities of Goodman

It also applies to how we interact with everyone we encounter at work, including our customers, suppliers, partners, regulators, and securityholders. Compliance with it is crucial.

## Why do we need to follow the Code?

Not following the Code can have serious consequences such as damage to Goodman's reputation, legal liability, and may result in disciplinary action up to and including termination of employment.

## What if I have concerns or someone is not following the Code?

We foster an environment that encourages and supports our people to report concerns about something that doesn't feel right, is inconsistent with our Code, or doesn't reflect our values. When you speak up and report any concerns – even if you're not sure whether it is a breach, we'll listen and act.

Any concerns can be disclosed to the CEO, Legal, or HR. Concerns can also be emailed to [ethicalconcerns@goodman.com](mailto:ethicalconcerns@goodman.com) or reported anonymously via Contact us on the Goodman website.

Concerns will be taken seriously and treated confidentially. Where there has been a breach of the Code it will be reported to the Audit Committee and if serious reported to the Board.

## How to apply the Code?

It's important that you get to know and follow the Code. This will help you do the right thing, including when faced with difficult situations, or when you are not sure what to do. In some cases, you will need to look at the policies referred to in the Code for further guidance. Our Code also includes a set of guiding principles that can further help you make the right decision.

## What are Goodman's guiding principles?

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

### 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. Support our sustainability strategy and targets
8. Manage conflicts of interest
9. 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, working flexibly, at social functions, travelling on company business, or on social media. We use social media responsibly in accordance with our social media and media guidelines. We can like, comment on, or share Goodman content to promote Goodman's brand and increase engagement with our stakeholders. We keep our comments positive, factual, and free of controversial opinion and political views. We do not share sensitive or confidential information about Goodman, our customers, or securityholders. We do not make statements to the media – we leave that to those that are authorised to do so.

### Key policies and more information

- + [Media Policy](#)
- + [Media Spokesperson List](#)
- + [Social Media Guidelines](#)
- + [Market Disclosure Policy](#)

## 2) Work as a team and respect others

We work as a team and promote a welcoming, inclusive, and diverse environment where everyone can thrive. We value and respect our differences. We have zero tolerance for bullying, harassment, discrimination, or any other offensive conduct. We are supportive and look after the health, safety, and wellbeing of ourselves and those around us. We raise any issues that can create a risk to the health and safety of others.

### Key policies and more information

- + Workplace Bullying and Harassment Policy
- + Sexual Harassment Policy
- + Inclusion and Diversity Policy
- + Safety Framework

## 3) Treat stakeholders fairly

We understand how important it is to treat customers, suppliers, partners, and other external parties fairly. We listen to them, and we act promptly on all issues. We try to pursue the best outcome for all our stakeholders. We do what we say we'll do. Our word means something. We think about whether the decision is aligned with our values, whether we are being clear and transparent and whether the decision is fair for our stakeholders.

## 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 form of fraud, bribery, or corruption. This includes bribes, kickbacks, facilitation payments, theft of funds (including falsifying invoices, timesheets, or personal expense claims), or misuse of company assets (including IT equipment and vehicles). We act within our authority as delegated to us by the Board, where applicable.

We are alert to any activity associated with money laundering or terrorist financing or transactions that may involve entities or individuals who are subject to sanctions. We have a responsibility to report any suspicious activity or any unethical or unlawful conduct and co-operate with any internal or external investigations.

### Key policies and more information

- + Anti-Bribery and Corruption Policy
- + Anti-Money Laundering and Counter-Terrorism Financing and Sanctions Policy
- + Delegations of Authority

## 5) Follow the law and our policies

We comply with all our legal and regulatory obligations, including the Code, key policies, and procedures. If there is any inconsistency with the law or regulations then we automatically defer to the higher standard and raise the inconsistency with our manager. If we're unsure about which policies and procedures apply, we speak with our manager, Legal, or HR.

We understand if we fail to comply with laws and regulations, both Goodman and individual team members may face criminal penalties or other serious consequences. We also complete any training as directed to make sure we are up to date with relevant laws and policies and to help us understand what is expected of us.

[Go to the Greenroom for our key policies.](#)





## Questions

Should you have any questions about this policy, please speak with your manager, Legal, or HR.

Date approved	March 2024
Responsible Department	Human Resources
Version number	2.0
Last review date	March 2024
Next review date	March 2026
Approved by	Chief Executive Officer – New Zealand
Related policies, procedures, and forms	<ul style="list-style-type: none"> <li>Media Policy</li> <li>Media Spokesperson List</li> <li>Social Media Guidelines</li> <li>Market Disclosure Policy</li> <li>Workplace Bullying and Harassment Policy</li> <li>Sexual Harassment Policy</li> <li>Inclusion and Diversity Policy</li> <li>Safety Framework</li> <li>Anti-Bribery and Corruption Policy</li> <li>Anti-Money Laundering and Counter-Terrorism Financing and Sanctions Policy</li> <li>Delegations of Authority</li> <li>Privacy Policy</li> <li>IT Policies</li> <li>Sustainability Policy</li> <li>Statement of Business Ethics</li> <li>Modern Slavery Statement</li> <li>Sustainable Sourcing Framework</li> <li>Ethical Concerns (Whistleblower) Policy</li> <li>Gifts and Entertainment Policy</li> <li>Political Donations Policy</li> <li>Securities Trading Policy</li> </ul>
Legacy policy or document	Code of Conduct v1.0