Security Trading Policy

August 2026

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1 Introduction

1.1 Purpose of this policy

Pursuant to the ASX Listing Rules, Mirvac Group is required to have a securities trading policy in place which complies with the requirements of those ASX Listing Rules.

The purpose of this policy is to:

(a) assist Directors and Employees to comply with their legal obligations when Dealing in Relevant Mirvac Securities; and
(b) protect the reputation of the Mirvac Group, Directors and Employees.

If you do not understand any part of this policy or how it applies to you, you should contact the Group Company Secretary before Dealing in any Relevant Mirvac Securities.

1.2 Application of the policy

This policy applies to all:

(a) Directors of the Mirvac Group;
(b) Employees of the Mirvac Group; and
(c) consultants and contractors of the Mirvac Group whose terms of engagement apply this policy to them.

1.3 Breach of policy and penalties for insider trading

A breach of this policy by any person is serious and may lead to disciplinary action, including dismissal in serious cases. It may also constitute for the Director or Employee and/or the Mirvac Group a breach of the law and lead to severe fines and/or imprisonment, and potential civil liability for any loss suffered as a result of a prohibited Dealing in Securities.

A breach of insider trading laws is a criminal offence. You must not deal in any securities (including Relevant Mirvac Securities) at any time whilst in possession of Inside Information. Appendix A contains additional information on this prohibition. Any Director or Employee who becomes aware of a breach or suspected breach of this policy must immediately report the breach or suspected breach to the Group Company Secretary.

1.4 Definitions

Terminology used throughout this policy is defined in section 9 of this policy.

1.5 Related Policies

This policy is to be read in conjunction with the following related policies:

- Continuous Disclosure and External Communications Policy; and
- Code of Conduct.

2 Permitted Dealings

Subject at all times to not being in possession of Inside Information, a Director or Employee may only Deal in Relevant Mirvac Securities, or procure another person to Deal in Relevant Mirvac Securities:

(a) during a Trading Window, and after first obtaining on a confidential basis the written consent of the Approving Officers in accordance with section 4 of this policy;
(b) outside of a Trading Window only if Special Circumstances exist, and after first obtaining on a confidential basis the written consent of the Approving Officers in accordance with section 5 of this policy; or
(c) if the Dealing is an Excluded Dealing.

Any Director or Employee who is in possession of Inside Information must not Deal or communicate such Inside Information at any time, regardless of whether or not it is during a Trading Window**.**

3 Approval to Deal and Reporting

3.1 Notice of Intention to Deal

Any Director or Employee who wishes to Deal in Relevant Mirvac Securities must complete and submit a Notice of Intention to Deal Form (which is available on the Mirvac Group intranet).

3.2 Approval from Approving Officers

The Approving Officers must, within 7 days of the receipt of a completed Notice of Intention to Deal, notify the Director or Employee as to whether their request is approved or not approved. A Notice of Intention to Deal (whether approved or unapproved) becomes void immediately upon the closure of a trading window.

A Director or Employee must not Deal without a written approval from the relevant Approving Officers (if such approval is required under this policy).

In considering whether to approve, the Approving Officers may take into account future matters, plans and intentions of the Mirvac Group. The Approving Officers may not approve a Dealing by a Director or Employee if the Approving Officers believe the proposed Dealing may breach this policy or any law or could result in reputation or may otherwise adversely impact the Mirvac Group. No reason will be given for the grant or refusal of approval to Deal. A Director or Employee must keep confidential whether their request to Deal is approved or not approved.

An approval must:

(a) be in writing (including email or any other form of electronic communication) and must specify the duration of the approval;
(b) not be retrospective in relation to past Dealing; and
(c) not be for a period of more than 5 business days (i.e. the instruction to trade must be placed before the earlier of the end of the Trading Window or the expiry of the approval. For the avoidance of doubt, once the instruction to trade has been placed, the Dealing may settle outside of the Trading Window or approval period).

An approval lapses immediately and without further notification if a Director or Employee to whom an approval has been given acquires Inside Information or if a Trading Window closes.

3.3 Notification of Dealing by Directors

A Director must give the Group Company Secretary details of any approved Dealing in Relevant Mirvac Securities (including the date and number of Securities) within 2 business days of the Dealing.

In the event that a Director of Mirvac Limited, Mirvac Funds Limited or any other listed entity within the Mirvac Group Deals in Relevant Mirvac Securities, an ASX Appendix 3Y must be lodged by the Group Company Secretary (or their delegate) within 5 business days after the Dealing takes place.

3.4 Records

The Approving Officers must send a written record of:

(a) any information received from a Director or Employee in connection with this policy (including Notice of Intention to Deal forms); and
(b) any approval or non-approval given under this policy,

to the Group Company Secretary, who must keep a file of those records.

Directors and Employees must keep a record of their Dealings in Relevant Mirvac Securities and make a copy of those records available to the Mirvac Group on request.

4 Confirmation of Compliance

Directors and Employees must, upon request and at any time, confirm in writing that they have complied with the requirements of this policy.

From time to time, the Mirvac Group may also undertake checks to verify compliance with this policy.

5 Declaration of Additional Trading Windows or Trading Blackouts

The Mirvac Group may, at any time, declare additional trading windows or trading blackouts, or vary or cancel any existing trading windows or trading blackouts in Relevant Mirvac Securities at any time at its discretion and without prior notice if considered necessary. Trading Windows will operate automatically at the time described above. The Group Company Secretary will notify Directors and Employees by email when a Trading Window commences and closes.

6 Prohibited Dealings and Actions

6.1 Speculative Dealing

No Director or Employee may Deal in Relevant Mirvac Securities or options or derivatives over Relevant Mirvac Securities on considerations of a short-term nature (being a period of 6 months or less).

6.2 Hedging

No Director or Employee may enter into any:

(a) transactions in financial products or other arrangements to hedge the value of either:
    (i) unvested awards; or
    (ii) vested awards that remain subject to a holding lock granted under any employee security scheme;
(b) derivative agreements in respect of any unvested Securities, performance rights, options or other awards pursuant to any employee security scheme; or
(c) derivative agreements in respect of any Relevant Mirvac Securities.

6.3 Margin loans or other security arrangements

No Director or Employee may enter into, or maintain, any loan or other financial arrangement under which security rights over Mirvac Relevant Securities are granted to a third party.

6.4 Short selling

No Director or Employee may engage in short selling of Relevant Mirvac Securities at any time.

7 General

7.1 Distribution of policy

This policy must be:

(a) distributed to all Directors and Employees;
(b) published on the Mirvac website; and
(c) made available to all Directors and Employees via Mirvac Group's intranet.

From time to time, the Mirvac Group will facilitate training on this policy for Directors and Employees.

7.2 Review of this policy

This policy will be reviewed periodically to ensure it continues to comply with the law and remains relevant and effective. It is intended that this review be conducted at least every 3 years.

Material changes made to this policy arising from periodical reviews will be disclosed to the ASX within 5 days of the changes being made.

8 Definitions and Interpretation

8.1 Definitions

In this policy:

Approving Officers has the following persons under this policy:

Notice of Intention to Deal form	Approving Officer(s)
Employees (other than those officers listed below)	Any two members of the Executive Leadership Team, one of which must be one of the following: • Group Chief Executive Officer and Managing Director; or • Chief Financial Officer.
Non-Executive Directors (other than the Chair of Mirvac Limited, Mirvac Funds Limited or any other listed entity within the Mirvac Group)	The Chair of the Board of Mirvac Limited and Mirvac Funds Limited, with the support of the Group Chief Executive Officer and Managing Director.
Chair of Mirvac Limited, Mirvac Funds Limited or any other listed entity within the Mirvac Group	The Chair of the Mirvac Group Audit, Risk and Compliance Committee, with the support of the Group Chief Executive Officer and Managing Director.
Group Chief Executive Officer and Managing Director	The Chair of the Board of Mirvac Limited and Mirvac Funds Limited and the Chair of the Mirvac Group Audit, Risk and Compliance Committee, with the support of the Chief Financial Officer.
Executive Leadership Team (other than the Group Chief Executive Officer and Managing Director and Chief Financial Officer)	The Group Chief Executive Officer and Managing Director (or their delegate, being the Chief Financial Officer) and the Mirvac Group Audit, Risk and Compliance Committee Chair (or their delegate).
Chief Financial Officer	The Group Chief Executive Officer and Managing Director and the Mirvac Group Audit, Risk and Compliance Committee Chair (or their delegate).

Associate of a Director or Employee includes:

(a) their spouse, de facto or partner;
(b) their dependent children and any other dependent persons;
(c) any trustee of a trust or other fiduciary arrangement under which they, their spouse or partner, or their dependents, is or may be a beneficiary;
(d) any company in which they, their spouse or partner, or their dependants, hold a majority of the shares or otherwise control (directly or indirectly);
(e) any other entity in which they are a director, secretary or executive officer; and
(f) any investment manager who acts on behalf of the Director or Employee or on behalf of a Director or Employee's Associates.

ASX means ASX Limited or, depending on the context, the financial market that it operates.

Chief Executive Officer and Managing Director means the person holding the office of Chief Executive Officer and Managing Director of the Mirvac Group.

Corporations Act means the Corporations Act 2001 (Cth) as affected by any class order or other instrument of the Australian Securities and Investments Commission applying to the Mirvac Group.

Dealing includes:

(a) applying for, acquiring or disposing of, Securities or entering into an agreement to do so; and
(b) arranging, granting, accepting, acquiring, disposing, exercising or discharging an option or other right or obligation to acquire or dispose of Securities,

and **Deal** has a corresponding meaning.

Employee means an employee of the Mirvac Group, and contractors required to comply with Mirvac Group's policies and procedures.

An **Excluded Dealing** in relation to Relevant Mirvac Securities by a Director or Employee means Dealing in the Relevant Mirvac Securities:

(a) that results in no change in beneficial interest in the Relevant Mirvac Securities;
(b) where the Dealing occurs via investments in a scheme or other arrangement where the investment decisions are exercised by a third party;
(c) where the Director or Employee has no control or influence with respect to Dealing decisions; or
(d) where the Dealing occurs under an offer to all or most of the holders of the Relevant Mirvac Securities.

See Appendix A for examples of Excluded Dealings

Information is **Generally Available** if it:

(a) is readily observable, that is, accessible to the public by whatever means;
(b) has been made known in a manner that would, or would be likely to, bring it to the attention of persons who commonly invest in Securities of the relevant type and since it was made known, a reasonable period for it to be disseminated; or
(c) consists of deductions, conclusions or inferences made or drawn from information that is readily observable or has been made known in the manner referred to in paragraph (b) of this definition.

Group Company Secretary means the person holding the office of Group Company Secretary of the Mirvac Group.

Inside Information is information relating to Relevant Mirvac Securities that:

(a) is not Generally Available; and
(b) if it were Generally Available, a reasonable person would expect it to have a material effect on the price of the Relevant Mirvac Securities.

This includes all oral or written information, whether matters of uncertain nature, rumours, matters of supposition, matters relating to the intentions of a person (including an entity in the Mirvac Group or an entity which has a Mirvac Group member which acts as its trustee or responsible entity), indefinite matters that are not required to be disclosed to the public, and whether accurate, inaccurate or incorrect. It is not limited to information regarding the Mirvac Group but may relate to other persons, including customers, suppliers, counterparties, investors or other persons with whom the Mirvac Group is in discussions. *See Appendix A for examples of Inside Information.*

Mirvac Group means Mirvac Limited, the Mirvac Property Trust and their respective controlled entities.

Non-Executive Director means a non-executive director of each of Mirvac Limited, Mirvac Funds Limited or any other Mirvac Group entity.

Relevant Mirvac Securities means the Securities in:

(a) Mirvac Group (being ASX ticker code MGR); or
(b) any other listed entity within the Mirvac Group.

Special Circumstances means one of the following circumstances**:**

(a) to comply with the requirements of a court order or other legal or regulatory requirement;
(b) severe financial hardship for a pressing financial commitment which cannot be satisfied other than by disposing of Relevant Mirvac Securities; or
(c) any other circumstance which is considered to be an exceptional circumstance by the Approving Officers.

Securities include:

(a) stapled securities, shares or bonds issued or proposed to be issued by a company;
(b) derivatives including swaps, equity or credit derivatives;
(c) units in a managed investment scheme;
(d) debentures, stocks or bonds issued or proposed to be issued by a government;
(e) options; and
(f) any other financial products that are able to be traded on a financial market.

Trading Window means:

(a) the 6-week period commencing the next business day after the day on which the half-year or full year results are released (as applicable to the relevant entity), as may be varied or cancelled in accordance with section 5;
(b) the 2-week period commencing the next business day after the day of the Annual General Meeting, as may be varied or cancelled in accordance with section 5; or
(c) any period advised by the Mirvac Group to be a Trading Window.

8.2 Interpretation

(a) Where relevant, words used in this policy have the same meaning as in the Corporations Act.
(b) A reference to days is a reference to calendar days unless otherwise specified in this policy.

(c) A reference to 'including' is to be read as 'including (without limitation)'.
(d) A reference to Deal or Deals has the same meaning as 'Dealing'.

9 Approval

This policy was approved and adopted by the Mirvac Group Board on 18 August 2026.

Appendix A

Prohibition on Insider Trading

If a Director or Employee has Inside Information and that Director or Employee knows or ought reasonably to know, that the information is Inside Information, it is illegal for that Director or Employee to:

(a) Deal in the relevant Securities;
(b) procure another person to Deal in the relevant Securities; or
(c) communicate the information, or cause the information to be communicated to another person if he or she knows, or ought reasonably to know, that the other person would or would be likely to:
    (i) Deal in the Securities; or
    (ii) procure someone else to Deal in the Securities.

Insider trading is not restricted to trading in Relevant Mirvac Securities. A Director or Employee who is in possession of Inside Information in respect of any listed entity and then Deals in the Securities of that other entity with the benefit of Inside Information may be guilty of insider trading. An example may be a Director or Employee who comes into possession of Inside Information about another listed entity, arising as a result of a proposed transaction with the Mirvac Group, and that person subsequently Deals illegally in the Securities of the other listed entity.

A breach of the prohibition under this section may also constitute a breach of the Director or Employee's confidentiality obligations to the Mirvac Group.

Extension of prohibition to Associates of Directors and Employees

Where this policy places a restriction on a Director or Employee in Dealing in Relevant Mirvac Securities, the Director or Employee must not knowingly allow a Dealing in Relevant Mirvac Securities by any of its Associates.

In order to comply with this section, a Director or Employee must inform any Associate of the Director or Employee of the restrictions placed upon them under this policy. An Associate of the Director or Employee must not Deal in Relevant Mirvac Securities without approval being obtained in accordance with this policy.

Examples of Inside Information

Examples of Inside Information might include:

(a) a material change to forecast results of an entity;
(b) a material acquisition of an asset or sale of an asset;
(c) a proposed or actual takeover or scheme;
(d) a proposed or actual merger;
(e) proposed material legal proceedings being commenced by or against an entity;
(f) regulatory action or investigation by government authorities;
(g) a proposed or actual dividend or distribution or change in the dividend or distribution policy;
(h) a significant expansion or contraction of business operations;

(i) a change of a responsible entity;
(j) senior management or Board changes;
(k) the loss of a major tenant or a material breach of a lease by a major tenant which would have a material impact on earnings of the relevant entity;
(l) an industrial dispute or project delays on a material project or development; or
(m) any new or changes in ratings by a rating agency.

Examples of Excluded Dealings

Examples of Excluded Dealing might include:

(a) transfer of Relevant Mirvac Securities held by a Director or Employee into a superannuation fund or other saving scheme in which the Director or Employee is the **only** beneficiary;
(b) an investment in, or trading in units of, a fund or other scheme (other than a scheme only investing in Relevant Mirvac Securities) where the assets of the fund or other scheme are invested at the discretion of a third party;
(c) where the Director or Employee is a trustee, trading in the Relevant Mirvac Securities by that trust where the Director or Employee is not a beneficiary of the trust and any decisions to trade are taken by the other trustees or by investment managers independently of the Director or Employee;
(d) undertakings to accept, or the acceptance of, a takeover offer in relation to Relevant Mirvac Securities;
(e) trading under an offer or invitation made to all or most of the holders of Relevant Mirvac Securities such as, a rights issue, a security purchase plan and an equal access buy-back, where the plan that determines the timing and structure of the offer has been approved by the Board, including decisions relating to whether or not to take up the entitlements and the sale of entitlements required to provide for the take up of the balance of entitlements under the renounceable pro rata issue;
(f) an application for performance rights under any employee security scheme or an allotment of Securities pursuant to any employee security scheme in response to an offer made by the Mirvac Group in accordance with the terms of the relevant employee security scheme and where the timing and structure of the offer has been approved by the Board (for the avoidance of doubt, the subsequent disposal of Relevant Mirvac Securities acquired under an employee security scheme is subject to the prohibitions outlined in this policy); and
(g) an acquisition of Securities under a security purchase plan or a dividend or distribution plan where the Director or Employee did not enter into or amend their participation in the plan outside a Trading Window.