# GOVERNMENT RELATIONS POLICY

August 2023



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## 1.1 Purpose

This policy aims to protect and enhance Mirvac's brand and corporate reputation, satisfy regulatory requirements, deliver on our Environmental, Social, and Governance (ESG) commitments and minimise adverse stakeholder outcomes. It outlines the terms by which Mirvac manages its relationships with politicians or political parties at all levels of government, and our approach to engaging with stakeholders as well as industry groups.

Mirvac prides itself on having a high level of engagement with all levels of government. We strive to be a trusted partner of governments by coordinating this engagement across the organisation. We do not make donations to politicians or political parties at any level of government.

Federal, state and local governments set the regulatory environment in which we operate. We maintain a bipartisan approach and actively engage with all levels of government including politicians and their offices, public servants, regulators and our industry bodies in New South Wales, Victoria, Queensland, Western Australia and the Australian Capital Territory, as well as the Federal Government, about policy decisions in general and those that affect our properties and projects. Our advocacy may include canvassing the full range of project planning options at all levels of government and with relevant agencies.

#### 1.2 Scope

This policy applies to Mirvac and all Mirvac employees including, but not limited to non-executive directors, permanent, casual, fixed-term employees and temporary workers. Compliance with this policy is mandatory.

# 1.3 Political donations and gifts

Mirvac is a property developer and its employees and Restricted Officers<sup>1</sup> are prohibited by law in certain jurisdictions (including NSW, Queensland and ACT) from making any political donations or soliciting another to make a political donation on behalf of Mirvac.

Mirvac does not make any political donations in any jurisdiction. We expect that all of our projects will be assessed on their merits. This includes donating money, services or good in kind to politicians or political parties directly or through third parties. The prohibition applies to a Restricted Officer (which includes their spouse or de facto partner), regardless of whether or not they are acting in their personal or private capacity.

Mirvac employees and Restricted Officers must not attend political fundraisers such as party forums or conferences, seminars, breakfasts, lunches or dinners, irrespective of who is paying. For the avoidance of doubt, this restriction applies to attendance at any political fund raisers in any capacity (personal, private or otherwise) outside of the Mirvac Group.

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Last Revised Date: June 2023 by Amy Menere

<sup>&</sup>lt;sup>1</sup> Restricted Officer means:

i. any director or Officer of Mirvac Limited and its Related Bodies Corporate

ii. any director or Officer of any entity that Mirvac Group has more than 20% of voting power (either direct or indirectly) where that entity is engaged in a business that regularly involves the making of relevant planning applications by or on behalf of the corporation in connection with the residential or commercial development of land, with the ultimate purpose of the sale or lease of the land for profit;

iii. any spouse or de facto partner of a director or Officer set out in (i) or (ii) above

iv. where relevant, a word used in this policy has the same meaning as in the Corporations Act 2001 (Cth).



Where an elected representative is supporting a charity or worthy cause, for any payment to that charity or cause, approval can be sought for such payment from Stakeholder Relations provided that doing so will not constitute a political donation.

It is acknowledged that from time to time, Non-executive Directors of Mirvac Group are invited to attend political forums in their capacity as Non-executive Director of another entity, at that entity's expense.

#### 1.4 Access to our properties

Mirvac does not consent to political canvassing, advertising or campaigning in free or casual leased space in our retail centres. Elected representatives are welcome to be a permanent tenant and the Stakeholder Relations team should be advised.

Subject to agreement with Mirvac, sitting Federal and State MPs and Mayors may conduct community-oriented events in our centres up to three times a year in the course of carrying out their representative duties. These visits must not have a campaigning tone and must not impede the everyday operations of the centre.

Federal or State party leaders can visit our Centres during elections, subject to prior notification to Mirvac. Relevant Ministers, Shadow Ministers, MPs and Mayors are permitted to visit our assets and projects for site tours and media statements, subject to prior approval.

## 1.5 Our approach to Stakeholder Engagement

Our Stakeholder Engagement Framework sets out the vision, principles, and tools to guide our interactions with our stakeholders. Its purpose is to:

- Set a consistent one Mirvac approach, with key principles for engagement across all our projects
- Build and maintain strong, healthy relationships with our stakeholders and the communities in which we operate
- Actively monitor issues and proactively respond
- Share and learn from our previous experiences
- Develop the capability of our people to embed a stakeholder centric culture

We are committed to maintaining strong, healthy relationships with our stakeholders and communities in which we operate. We strive to understand the diverse and changing needs of all of our stakeholders to develop strong communities with an enduring legacy. We recognise that creating value for our stakeholders while managing and leveraging our reputation helps to strengthen our operating environment, supports better project outcomes and allows us to deliver on our purpose, to Reimagine Urban Life.

Project teams are responsible for identifying and escalating issues in a timely manner to Stakeholder Relations.

# 1.6 Policy Review and Approval

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 once every 2 years.

This Policy was approved and adopted by the Mirvac Group Board on 15 August 2023.