Whistleblower Policy - Overview

At Dexus, we actively encourage and support our employees, suppliers and relatives to speak up with any concerns they may have.

We take pride in our values: *rally to achieve together* and *build trust through action.* These values are the driving force behind how we work and our culture.

Our Whistleblower Policy has been designed to offer protection, confidentiality, and assistance for all Dexus employees, suppliers, and relatives. If an employee, supplier, or relative is concerned that there has been a breach of Dexus's Codes of Conduct or another Dexus policy, an incident of fraud, corruption, bribery, or a breach of the law, or any conduct inconsistent with our values, we encourage you to act with initiative, take responsibility, and report your concerns.

We will not tolerate any discrimination or retaliation as a result of reporting a concern, and we are committed to fostering an environment in which employees, suppliers, and relatives feel safe, supported, and protected. In this Policy we outline how you can report an incident and how Dexus will respond.

The below summary has been designed to give you an overview of our Whistleblower Policy. The full Whistleblower Policy follows at page 3.

Who does this Policy affect?

Our Policy applies to an individual who is (or has been):

- a Dexus employee, including a contractor, consultant, intern or director
- a supplier of goods or services (including their employees) to Dexus;
- a relative, spouse or dependant of the above

What can be reported?

Generally, a reportable incident under our Policy would include any conduct that:

- constitutes fraudulent activity
- is dishonest, corrupt or illegal
- abuses human rights
- may indicate wilful or intentional breaches of the Group's key policies, including the Code of Conduct, or other unethical behaviour
- is a contravention of the Corporations Act, the Australian Securities and Investments Commission Act 2001 (Cth), the Competition and Consumer Act 2010 (Cth) or the Income Tax Assessment Act 1936 (Cth)

A more comprehensive list is available at Section 3 of the Policy.

Who should you report an incident to?

Dexus has several channels for you to report a suspected incident. Our Whistleblower Protection Officers (**WPO**) are Dexus's:

- General Counsel
- Head of Governance
- Chief People Officer
- Lead Statutory Auditor (KPMG)
- Lead Internal Auditor (EY)

Contact details (including email addresses) for the above officers are outlined in the Policy.

Whistleblower Reports may also be made to any officer or senior manager[1] of the Group.

We have also appointed an independent disclosure management service provider, Your-Call, to help you make a report. You can complete an online form on the Your-Call website at yourcall.com.au/report or call 1300 790 228 between 9:00am and midnight AEST (excluding weekends and public holidays) using Dexus's ID: DEXU5000. Your-Call is available to all Eligible Whistleblowers under this policy (including their relatives, spouses or dependants).

Investigation

If required, an investigation will take place as soon as possible. You will be updated on the matter accordingly. All investigations will be conducted in a thorough, fair and independent manner in accordance with best practice.

Protection for Eligible Whistleblowers

All reasonable steps will be taken by Dexus to ensure that you do not suffer detrimental treatment. Detrimental treatment includes dismissal, injury, demotion, discrimination, harassment, intimidation, disciplinary action, bias, threats or other unfavourable treatment. When requested by the Whistleblower, anonymity will be maintained.

Statutory protections

You also have statutory protections which are outlined in Section 10 of the Policy.

[1] Dexus employees with a title of "Head of…." are regarded as senior managers for the purpose of this Policy

Whistleblower Policy

Compliance Policy

Purpose and Scope

1. Purpose

Dexus's Whistleblower policy (**Policy**) has been established to ensure that each Australian domiciled entity in the Dexus Group (collectively, **the Group or Dexus**) conducts itself to the highest standards of honesty and integrity in its business activities, and reinforces and promotes the Dexus purpose that:

- We are a passionate and lively team who strive to make a difference
- We come to work to unlock potential and create tomorrow
- We believe in creating value for customers, investors, communities and our people
- Our values are to rally to achieve together and build trust through action

The purpose of this Policy is to provide a mechanism to encourage, protect and support the reporting of incidents of misconduct, fraud, questionable accounting, inappropriate behaviour or an improper state of affairs or circumstances or any other conduct inconsistent with our values or policies. The Policy also seeks to ensure those people who report a concern can do so without being subject to detrimental treatment.

2. Who does this Policy affect?

This Policy applies to an individual who is (or has been):

- an officer, employee or associate of any entity in the Group, including contractors, consultants, interns and directors
- suppliers of goods or services (whether paid or unpaid) to any entity in the Group, including an individual who is or has been employed by such a supplier
- a relative, spouse or dependant of any of the above.

An individual identified above is described as an **Eligible Whistleblower or Reporting Person** in this Policy.

3. What can be reported?

It is not possible to provide an exhaustive list of the activities that should be reported for the purposes of this Policy (**Reportable Conduct**). However, generally, Reportable Conduct includes any conduct of any entity in the Group or any conduct of any employee or officer of the Group, which an Eligible Whistleblower has reasonable grounds to suspect:

- constitutes misconduct or an improper state of affairs (for these purposes misconduct includes fraudulent activity including any breach of the Group's Fraud Prevention Policy and/or, Anti-Bribery and Corruption Policy, negligence, default, breach of trust and breach of duty), in relation to any entity in the Group
- is dishonest, corrupt or illegal activity (including criminal damage against property, theft, violence or threatened violence, drug sale or use or other breaches of State or Federal laws)
- are wilful or intentional breaches of the Group's key policies, including the Code of Conduct, or other unethical behaviour
- abuses of human rights including occurrences of modern slavery in either Dexus's operations or Dexus's supply chain
- is intentional withholding or manipulation of information provided to an auditor or regulator or misleading or deceptive conduct including practices or representations which amount to improper or misleading accounting or financial reporting
- is an offence under a law of Australia which is punishable by imprisonment for 12 months or more
- is a contravention of the Corporations Act, the Australian Securities and Investments Commission Act 2001 (Cth), the Competition and Consumer Act 2010 (Cth) or the Income Tax Assessment Act 1936 (Cth)
- is a contravention of anti-money laundering or anti-bribery legislation or the Group's policy relating to these matters
- is a danger to the health or safety or one or more persons, a danger to the public or the financial system; or
- is conduct that may cause financial loss to any entity in the Group or is otherwise detrimental to the interests of any entity in the Group

Reportable Conduct can also include the conduct outlined above engaged in by an external party who has an association with the Group where the conduct could have legal implications for the Group or materially impact Dexus's reputation.

4. What is excluded from reporting?

Personal workplace grievances are generally not covered by this Whistleblower Policy and do not qualify for protection under the Corporations Act. Personal workplace grievances should be referred to your Manager or the People & Culture team in accordance with Dexus's Grievance Resolution Procedure which has been established to receive these complaints.

Examples of grievances that may be personal workplace grievances include:

- an interpersonal conflict between the discloser and another employee
- a decision relating to the engagement, transfer or promotion of the discloser
- a decision relating to the terms and conditions of engagement of the discloser
- a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser

However, the above rules do not apply where:

- the personal grievance relates to alleged detrimental treatment in breach of this Policy or if the concerns being raised may have significant implications for the Group
- the personal grievance includes information about misconduct, or information about misconduct includes or is accompanied by a personal grievance (mixed report)
- Dexus has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the Reporting Person's personal circumstances
- the Reporting Person seeks legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act

In these cases, the report may be considered to be Reportable Conduct under this Policy.

Reporting a Concern

5. Who should reports of Reportable Conduct be made to?

Dexus has several channels for an Eligible Whistleblower (or Reporting Person) to make a report of suspected Reportable Conduct (**Whistleblower Report**).

These are addressed below.

(a) Whistleblower Protection Officers

For the purpose of this Policy, Whistleblower Reports should be made to any one of the Whistleblower Protection Officers (**WPO**) listed below:

General Counsel (Dexus)
Brett Cameron
brett.cameron@dexus.com
P: +61 2 9017 1173

Head of Governance (Dexus)
Scott Mahony
scott.mahony@dexus.com
P: +61 2 9017 1122

Chief People Officer (Dexus)
Marjan van der Burg
marjan.vanderburg@dexus.com
P: +61 2 9017 1337

Dexus's Lead Statutory Auditor, KPMG (external)

Brendan Twining
btwining@kpmg.com.au
P: +61 2 9335 8400

Dexus's Lead Internal Auditor, EY (external)
Amy Grace
amy.grace@au.ey.com
P: +61 402 330 886

The WPO to whom a Whistleblower Report is made will determine the appropriate action to be taken in respect of the report (in consultation with the General Counsel or Head of Governance), including whether it should be subject to investigation under this Policy. By making a Whistleblower Report, a Reporting Person consents to the detail of the Whistleblower Report (including their identity unless they have elected to remain anonymous) being disclosed to the General Counsel and/or Head of Governance for this purpose.

Where a Reporting Person has concerns that involve, or where there is a potential conflict of interest involving, any of the WPOs listed above, the Reporting Person should direct their Whistleblower Report to any other WPO who is not the subject of the concern, or alternatively to Your-Call or to a member of the DXFM Board. If a concern involves all internal WPOs, the Reporting Person may make a report directly to the Lead Statutory Auditor (KPMG) or Lead Internal Auditor (EY), or directly to ASIC or another relevant regulator.

(b) Senior Managers

Whistleblower Reports may also be made to any officer or senior manager of the Group.

While Whistleblower Reports can be made to any "officer" or "senior manager" (within the meaning of the Corporations Act) of any entity in the Group, we encourage Whistleblower Reports made for the purpose of this Policy to be made to the designated WPOs above (or through Your-call) to ensure the report is handled in accordance with this Policy.

An officer or senior manager who receives a Whistleblower Report will provide details of the report to a WPO so the report may be handled in accordance with this Policy. By making a Whistleblower Report to an officer or senior manager (who is not a WPO) a Reporting Person consents to the details of the Whistleblower Report (including their identity unless they have elected to remain anonymous) being disclosed to a WPO so it can be addressed in accordance with this Policy.

(c) Your-Call

Dexus has also appointed an independent disclosure management service provider, Your-Call, to enable a Reporting Person to make a Whistleblower Report under this Policy.

Your-Call will provide details of the Whistleblower Report to a Dexus WPO. A Reporting Person who makes a Whistleblower Report to Your-Call consents to Your-Call sharing the details of the Whistleblower Report (including their identity unless they have elected to remain anonymous) being disclosed to a WPO so the Whistleblower Report may be investigated in accordance with this Policy.

(d) Regulatory and other bodies

Complaints can be lodged with a regulator such as ASIC, APRA, the ATO or another Commonwealth body prescribed by regulation.

Further information about external reporting can be found below:

- ASIC
- APRA
- ATO

A Reporting Person may seek additional information before formally making a Whistleblower Report to a Regulatory or other body by contacting a WPO, or by seeking advice from an independent legal practitioner.

(e) Public Interest Disclosures and Emergency Disclosures

Within Australia, in certain circumstances, disclosures can be made to a journalist or parliamentarian and qualify for protection under the whistleblower provisions of the Act.

Emergency Disclosure

An Emergency Disclosure is the disclosure of information to a journalist or parliamentarian, where:

- you have previously made a disclosure of the information to ASIC, APRA or another Commonwealth body prescribed by regulation
- you have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment
- before making the emergency disclosure, you have given written notice to the body to which the previous disclosure was made that:
    - includes sufficient information to identify the previous disclosure and
    - states that you intend to make an emergency disclosure and
- the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger

Public Interest Disclosure

A Public Interest Disclosure is the disclosure of information to a journalist or parliamentarian, where:

- at least 90 days have passed since you made the disclosure to ASIC, APRA or another Commonwealth body prescribed by regulation

- you do not have reasonable grounds to believe that action is being, or has been taken, in relation to your disclosure
- you have reasonable grounds to believe that making a further disclosure of the information is in the public interest and
- before making the public interest disclosure, you have given written notice to the body to which the previous disclosure was made that:
    - includes sufficient information to identify the previous disclosur; and
    - states that you intend to make a public interest disclosure

It is important to understand the criteria for making a public interest or emergency disclosure. Before making a public interest or emergency disclosure, it is recommended that you seek independent legal advice.

6. How to make a report

Whistleblower Reports can be made through one of the following means:

- by an email or phone call to the WPOs
- by an email or phone call to one of the officers or senior managers. Where a Whistleblower Report is made by email, the subject of the email should make it clear that the email is a report under this Policy or
- by completing an online form on the Your-Call website at https://www.yourcall.com.au/report, or by calling 1300 790 228 between 9.00am and 12.00am AEST, Monday to Friday (excluding public holidays). To complete an online report, log on to the "Your-Call" website and click on the "make a report" button. Follow the prompts after entering **Dexus's ID: DEXU5000** to supply information in an electronic form. Your-Call is available to all Eligible Whistleblowers under this policy (including their relatives, spouses or dependants).

Information received from a Reporting Person via any of these channels will be kept confidential to the extent possible, subject to the Group's escalation and reporting procedures and ongoing compliance with legal and statutory obligations. In particular, the Group may be required to disclose the information received to appropriate regulatory authorities including ASIC, APRA, the Australian Federal Police or other governmental agencies. By making a Whistleblower Report under this Policy, a Reporting Person also consents to the Whistleblower Report being escalated and reported in accordance with this Policy.

At the time of making a Whistleblower Report, a Reporting Person should also indicate whether they consent to the recipient of their report disclosing their identity to other persons (including the designated whistleblower investigation team if established), the Group's external legal advisors, the Chief Executive Officer & Managing Director and the Board of the relevant entity in the Group. A Reporting Person who makes a Whistleblower Report under this Policy will be taken to consent to their identity being shared to these limited persons for the purpose of this Policy unless they positively indicate they wish to remain anonymous.

A Reporting Person may elect to make a report anonymously and will still be protected under the Corporations Act. Dexus will respect the Reporting Person's right not to identify themselves and will support ongoing two-way anonymous communication through Your-Call where available. However, if a Reporting Person chooses to make a report anonymously, it may mean that any investigation by Dexus is limited.

Protections, Support and Investigation

7. Confidentiality

Dexus is committed to ensuring that Whistleblower Reports are managed with appropriate confidentiality and in accordance with statutory confidentiality regimes in the Corporations Act and the Tax Administration Act where applicable.

Subject to compliance with legal reporting obligations when implementing any process under this Policy, Dexus will:

- not disclose the identity of a Reporting Person without their consent
- ensure that information contained in a Whistleblower Report is only disclosed to the extent necessary to conduct an investigation or administer this Policy and
- take reasonable steps to reduce the risk that the Reporting Person will be identified as part of any process conducted under this Policy

Nothing in this Policy prevents Dexus or any person from disclosing information required by law.

Other than in circumstances required by law, the disclosure of information in a Whistleblower Report (other than as permitted by this Policy) will be a breach of this Policy and will be dealt with under the Group's disciplinary procedures.

All records produced as part of receiving or investigating a Whistleblower Report will be securely retained with access restricted. A Reporting Person who makes a Whistleblower Report consents to this information being handled in this way.

8. Investigation

Where it has been determined a Whistleblower Report should be subject to further investigation, it will be investigated as soon as practicable after the matter has been reported. Dexus is committed to ensuring that investigations are undertaken in a timely manner and will provide the Eligible Whistleblower with an indicative timeframe for the completion of the investigation.

A workflow has been developed to assist the reporting and investigation process and facilitate a consistent approach to assessing and responding to disclosures. The workflow is subject to periodic review.

In most instances, investigations will be undertaken by designated members of the Governance team or People & Culture team (the **Whistleblower Investigation Team** and each a **Whistleblower Investigation Officer**). In certain circumstances, an external investigator may be appointed.

Where appropriate, the Whistleblower Investigation Team will provide updates to the Eligible Whistleblower regarding the investigation's progress and/or outcome.

(a) Anonymous Whistleblower Reports

Where a Whistleblower Report has been made anonymously via Your-Call, this information will be loaded onto Your-Call to allow the individual to anonymously access the file to receive an update on the investigation.

Where a Whistleblower Report has been made partially anonymous via an eligible recipient, where appropriate, the eligible recipient will provide updates to the Eligible Whistleblower regarding the investigation's progress and/or outcome.

All investigations will be conducted in a thorough, fair and independent manner in accordance with best practice having regard to the interests of all parties involved. Implemented measures and mechanisms to ensure fair treatment of individuals mentioned in a disclosure include:

- disclosures will be handled confidentially, when it is practical and appropriate in the circumstances
- each disclosure will be assessed and may be the subject of an investigation
- the objective of an investigation is to determine whether there is enough evidence to substantiate or refute the matters reported
- an employee who is the subject of a disclosure will be advised about the subject matter of the disclosure as and when required by principles of natural justice and procedural fairness and prior to any actions being taken and
- an employee who is the subject of a disclosure (or who has made the disclosure) may contact Dexus's Employee Assistance Provider, Sonder. Refer to the **Respectful Workplace Policy** for further information on Dexus' Employee Assistance Program (EAP).

9. Resources and protections for Eligible Whistleblowers

Dexus is committed to ensuring that a Reporting Person who makes a Whistleblower Report in accordance with this Policy will not suffer detrimental treatment or be disadvantaged as a direct consequence of making that report, and may still qualify for statutory protections, even if the report is subsequently determined to be incorrect or is not substantiated. The law offers further protections where Eligible Whistleblowers make a disclosure outside this Whistleblower Policy (for example, if potential misconduct is reported to people other than Whistleblower Protection Officers).

Where appropriate, Dexus will appoint a Whistleblower Support Officer (WSO) (or designate a person performing this function) to support Reporting Persons and help protect them from detriment. The WSO will be independent from the investigation function to the extent practicable. All reasonable steps will be taken by Dexus to ensure that a Reporting Person does not suffer detrimental treatment (during or after the investigation) as a direct consequence of having made a report and is not subject to any form of victimisation or detrimental treatment. Detrimental treatment includes dismissal, injury, demotion, discrimination, harassment, intimidation, disciplinary action, bias, threats or other unfavourable treatment connected with making a report in accordance with this Policy. Detrimental treatment does not include administrative action that is reasonable for the purpose of protecting a Reporting Person or appropriately addressing conduct in accordance with Dexus's performance management framework.

A Reporting Person may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO if the Reporting Person believes they have suffered detriment.

Dexus is also committed to providing appropriate support to Reporting Persons. The nature of the support that may be offered will depend on the nature of the conduct reported and the personal circumstances of the Reporting Person.

Examples of the support provided by the Group include:

- the provision of the Your-Call hotline
- a fair and objective investigation process
- access to the Dexus's Employee Assistance Program
- support from People & Culture where reasonably required by a Reporting Person
- consideration of offering alternate work locations for the Reporting Person (where applicable) while the investigation is underway

Questions about the availability of support should be directed to a WPO and may also be addressed as part of the process of investigating a Whistleblower Report.

Both the Corporations Act and the Taxation Administration Act 1953 (Cth) (**Taxation Administration Act**) provide special protections available for Eligible Whistleblowers in respect of disclosures which qualify for protection under each Act. Dexus is committed to ensuring these legislative protections are complied with.

10. Statutory protections

This section sets out the special protections available for Eligible Whistleblowers who make disclosures that qualify for protection under the Corporations Act and/or Tax Administration Act.

(a) Corporations Act

The Corporations Act gives special protection to an individual who is an Eligible Whistleblower and who makes a disclosure which qualifies for protection under the Corporations Act.

This Policy is designed to comply with the requirements of the Corporations Act and to ensure that the protections available in the Corporations Act are afforded to Reporting Persons who make a disclosure, including disclosures to legal practitioners, regulatory and other external bodies, public interest and emergency disclosures which qualifies for protection under the Corporations Act.

To be protected by the Corporations Act:

- the individual must have reasonable grounds to suspect that the information they are reporting concerns misconduct or an improper state of affairs relating to an entity in the Group. This would include most cases of Reportable Conduct under this Policy and
- the report has been made to any of the following:
  - ASIC
  - APRA
  - the auditor for an entity in the Group, or a member of an audit team conducting an audit of the entity
  - a director, company secretary or senior manager of an entity in the Group
  - a WPO (or the Your-Call service)
  - a legal practitioner for the purpose of obtaining legal advice or representation in relation to the operation of the whistleblower protections in the Corporations Act

The Corporations Act also provides protection for public interest disclosures and emergency disclosures which meet specific requirements prescribed by the Corporations Act.

The protections available under the Corporations Act to an individual who meets the requirements above include:

- the right to have their identity protected in accordance with the provisions of that legislation
- the right to have information provided as part of the disclosure handled in accordance with the provisions of that legislation
- the right to be protected from civil, criminal or administrative liability (including disciplinary action) for making disclosure, from contractual or other remedy on the basis of the disclosure and from the admissibility of the information provided in evidence against the person, in each case in accordance with the provisions of that legislation
- the right to be protected from detrimental treatment or any form of victimisation in accordance with the provisions of that legislation
- the right to compensation and other remedies in accordance with the provisions of that legislation (including a right not to be required to pay costs incurred by another person when litigation is commenced)
- the right not to be required to disclose their identity before any court or tribunal in accordance with the provisions of that legislation

Disclosures that are not classified as Reportable Conduct do not qualify for protection under the Corporations Act, however, may be protected under other legislation. These protections do not grant immunity to a Reporting Person if it is revealed the Reporting Person engaged in any misconduct.

Any questions about these protections should be directed to a WPO. We encourage Reporting Persons to seek independent legal advice.

(b) Tax Administration Act

The Taxation Administration Act also provides protection for disclosures of information which indicates misconduct or an improper state of affairs in relation to the tax affairs of an entity, or an associate of an entity, where the discloser considers that the information may assist the Australian Taxation Office (ATO), Tax Practitioner Board (TPB) or an eligible recipient to perform functions or duties in relation to the tax affairs of the entity or an associate.

Protection is provided for disclosures made to the Commissioner of Taxation, Tax Practitioner Board (TPB), Inspector-General of Taxation (IGT) or an eligible recipient in accordance with the Tax Administration Act.

The protections available to an individual making a protected disclosure under the Taxation Administration Act are the same as those outlined above.

Disclosures that are not classified as Reportable Conduct do not qualify for protection under the Tax Administration Act, however, may be protected under other legislation.

11. Training

Dexus staff will be required to undertake training relating to Dexus's Whistleblower Policy on induction and at least every two years thereafter. Eligible Recipients, Whistleblower Protection Officers and any staff involved in triage, case management or investigations will receive periodic specialised training.

Successful completion of training is compulsory.

12. Escalation and Group reporting procedures

On a quarterly basis, the Head of Governance (in consultation with the General Counsel), will consider all reports made under this Whistleblower Policy. The Executive Committee will be provided with a list of all newly reported incidents and updates on existing incidents to ensure they are addressed in a timely manner. Reporting will be provided to relevant Boards and Board delegated committees on a quarterly basis. Reports will be provided on a thematic basis only and will not contain any information that could lead to the identification of a Reporting Person.

Dexus will also periodically seek feedback from employees on awareness of and trust in the whistleblower program and speak-up culture.

13. Availability of this Policy

This Policy is available on the Dexus intranet (including via the dedicated whistleblower webpage) and the Dexus external website.

Dexus will take reasonable steps to promote awareness of this Policy and the whistleblower reporting channels, including periodic communications and training.

14. Review of the Policy

This Policy will be reviewed from time to time (but at least annually), so the Policy complies with relevant standards and legislative requirements.

Version	Document Owner	Author	Approving Authority	Approved Date
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			Board Risk Committee	12 May 2026
			Dexus Asset Management Limited Board	7 August 2026
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