

A GUIDE

to asking *good* questions and making *good* choices.

Every day, we make thousands of choices that contribute to Mirvac's success, today and tomorrow. Sometimes these choices are easy, and sometimes the right choice isn't always as clear.

For example, sometimes we are faced with a situation which may cause delays, add risks, increase costs, or create an issue for one stakeholder, while making other stakeholders happy.

Our leaders can't make all our choices for us – it's just not efficient. So, Mirvac trusts us all to do the right thing. But how do we know what that is?

The truth is that sometimes, we can't know for sure. The most we can do is feel confident we've made the best choice we could, under the circumstances we were in, with the information we had, at a particular time.

THIS GUIDE

This guide is a process and set of principles to prompt you to ask the right questions, consider the right factors, and have the right conversations to find the best option. It outlines the principles we stand by when facing tough choices.

But principles will only ever get you so far. Principles don't deliver easy answers. Often, there is no one right answer, and the details really do matter.

Sometimes right or wrong is a legal matter, or there is an incident that requires an immediate response, and knowing which is which, and when to escalate in these situations is important.

To find the best possible answer to ethical challenges, we make sure we have the facts, apply our principles and processes to ask good questions, share the issue with others, and act with the trust of Mirvac.





STEPS



1

FIND OUT THE FACTS

No two situations are the same. Be as clear as you can be on the details you have.



2

USE OUR PRINCIPLES

Make sure you're asking yourself good questions. Does making this choice compromise any of our principles? What harm might be caused? How might it change who we are at Mirvac?



3

SHARE AND DISCUSS THE ISSUE

None of us knows it all. Better understand the problem by sharing it with people in and outside of your team – different perspectives can help shed light on it. Diversity matters.



4

ESCALATE EFFECTIVELY

Some problems are not ethical ones. If you suspect a crime has been committed or there is an incident, the issue should be escalated to the right people for management.



5

TRUST

We trust you – not to always get it right, but to act carefully, and with consideration and good judgement within our policies and processes. Integrity is what we do when no one is watching.

1. FIND OUT THE FACTS – GOOD QUESTIONS TO ASK YOURSELF

- > What do we know, not know, need to know, should know, can't know?
- > What **must** we do? What are our obligations by law, regulation, contract, internal policy, or tender process to act and/or to communicate?
- > Who might be **impacted** by our choices? Who might be **interested**?
- > What do these stakeholders **expect** of us?
- > Have we or others had a situation like this before from which we could learn?
- > What might our options be?

2. USE OUR PRINCIPLES

OUR PRINCIPLES	THIS MEANS...	AND NOT...
Duty of care	Human impact We think about the human impacts of our choices – on our employees, our customers, our communities, our partners, and our securityholders.	Simply doing no harm Doing no harm is not enough. We want people to be better off because of the choices we've made.
Creating long-term value	Force for good When we act as a force for good, we create enduring value – imagine the value delivered by this choice in 20-30 years' time.	Just taking the short-term gain We don't just act in the short-term interests of partners and securityholders. Sometimes we give up short-term gain for long-term value.
Enhancing our brand and reputation	Our promise We're proud of our history delivering quality and care in every little detail. Does this choice help us to grow our reputation by keeping the Mirvac promise?	Cutting corners Even if no one else ever knows we cut a corner, we'll know, and we won't forget it. Cutting corners can cut away a bit of who we are.
Transparency	The 'sunlight' test If this choice made the front page of the newspaper your family reads, would you be comfortable? We make choices which stand up to the sunlight test – when everybody knows, are we happy to defend it?	Excuses Using complicated and long-winded excuses for our actions won't pass the sunlight test. If it seems suspicious, there is a good chance it might be.

3. SHARE AND DISCUSS THE ISSUE

If this is an ethical issue, here are some examples of people with whom you might discuss it.

- > **Your manager:** test your thinking, and explore the options and the potential consequences. Does this need to be escalated to your manager?
- > **Other senior managers in your division:** ask someone with a bit of distance from the issue.
- > **Your team:** what are you concerned about? Do they share your concerns?
- > **Other teams:** diversity matters. Ask someone who can give you another perspective.
- > **Group Stakeholder Relations:** for advice on how to anticipate and manage social risk, which could extend project timelines and increase costs.
- > **Group Communications:** for advice on what our reputational risks are.
- > **Group Sustainability:** for help navigating this ethical principles guide.
- > **Group HSE:** for advice on non-conforming building materials.
- > **Group Procurement:** balancing quality, expertise and cost.

4. ESCALATE EFFECTIVELY

When you face a challenging ethical question, escalating to your manager can help.

And some problems are not just ethical; they may also be incidents or crimes. Mirvac has established policies and procedures for responding to these.

If an **incident** has occurred, the first step is to determine if there has been a safety, reputation or infrastructure impact that requires escalation. Our Crisis and Incident Management Plan Quick Reference Guide provides a clear process to determine whether an incident is business as usual or needs to be escalated, with HSE managers as the first point of contact for potential safety issues, and divisional MLT or ELT members as the first point of contact for all other issues.

If you have concerns about **misconduct** like theft, fraud, corruption, violence, illegal or unethical behaviour, these need to be reported. Our Whistleblower Policy provides a clear process for reporting these kinds of issues.

If you see or suspect any **fraudulent activity, bribery or corruption** or the potential for any activity, you must comply with our Code of Conduct and Fraud, Corruption, Bribery policy by reporting the possible breach. Our Whistleblower policy provides a clear process for identifying and escalating these kinds of issues.

5. TRUST

We trust you to act carefully and considerately. You are not alone in making the call on what action should be taken and we encourage you to use the processes designed to help you make a decision on how to act.

Type of problem	Situation	Supports available
ETHICAL	You're not sure what 'doing the right thing means' when facing a tough choice	<ul style="list-style-type: none"> > These guidelines > Your manager > Mirvac's Code of Conduct > Your judgement
INCIDENT	You become aware of an incident that poses a safety, reputation or infrastructure risk to Mirvac	<ul style="list-style-type: none"> > Your HSE manager > Crisis and Incident Management Plan
BREACH	You have concerns about misconduct at Mirvac	<ul style="list-style-type: none"> > Your manager > Whistleblower Policy > Any eligible recipients as defined by the Whistleblower Policy

