

# Anti-Competitive Behaviour Policy

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## 1. Purpose

Stockland is committed to conducting its operations with integrity and in a manner that is consistent with laws and business practices that are aimed at fostering an open, competitive and fair market environment and which will best serve the long-term interests of our customers, our stakeholders and the wider community.

This Policy sets out Stockland's approach to anti-competitive behaviours. Stockland is committed to dealing fairly and honestly with our customers, suppliers, competitors and any other business partners and the community (collectively "Stakeholders"), and observing relevant legislation, regulation, contractual obligations and Stockland's corporate policies – in particular the provisions of the Competition and Consumer Act 2020 (Cth) ("CCA").

## 2. Scope

This Policy applies to Stockland Corporation Limited, Stockland Trust and their related companies and trusts (collectively "**Stockland**") and all Stockland employees (including but not limited to non-executive directors, permanent, casual and fixed term employees and temporary workers) ("**Employees**").

Compliance with this Policy is mandatory.

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## 3. Principles

The key principles which guide Stockland's approach to anti-competitive behaviour are as follows:

- 3.1. The CCA governs anti-competitive and unfair behaviours. It is regulated by the Australian Competition & Consumer Commission ("ACCC").
- 3.2. The CCA promotes fair competition and prohibits practices that have the purpose or effect of substantially lessening competition or fair trade. A breach of the CCA may result in serious consequences for you and Stockland.
- 3.3. Consequently, Stockland has a commitment to complying with the CCA as by doing so it can enhance the welfare of Australians by:
  - (a) promoting competition among business;
  - (b) promoting fair trading by business; and
  - (c) protecting consumers in their dealings with business.

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## 4. Detecting Anti-Competitive Conduct

Employees should be alert to behaviour which may indicate anti-competitive conduct. This behaviour may include:

- Agreeing terms with a competitor which restrict free and fair competition, including price fixing, discounts, rebates or other procurement activities;
- Cartel conduct and collective boycotts between competitors, including arrangements aimed at restricting outputs or supply
- Agreeing with a competitor to exclusivity arrangements within defined territories or markets (known as market sharing or allocation arrangements);
- Conduct affecting the supply chain such as resale price maintenance and third line forcing;
- Coordinating bidding activities with a competitor;
- Conduct that has the purpose of limiting or preventing competitors from entering or competing in markets such as misuse of market power
- Exchanging commercially sensitive information with an existing or potential competitor;
- Unlawful acquisitions, partnerships and joint ventures; and
- Agreeing with competitors to boycott particular suppliers.

Employees must report any situations where they suspect that anti-competitive conduct has occurred in line with the Escalation Policy.

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## 5. Raising Concerns

Stockland is committed to providing an environment in which all Employees feel comfortable reporting incidents of anti-competitive conduct. Stockland is also committed to supporting people who report anti-competitive conduct in good faith, regardless of whether any wrongdoing was identified.

If an Employee or Stakeholder becomes aware of any anti-competitive behaviour, then they should raise their concern:

- **To their line Manager:** Report to the relevant line Manager and escalate to Group Risk
- **To Group Risk:** If an Employee does not feel comfortable making a report to their Line Manager, they can raise the matter directly with Group Risk by emailing [compliance@stockland.com.au](mailto:compliance@stockland.com.au);
- **To Stockland's Whistleblower Protection Officers ("WPO's"):** Report in accordance with the Whistleblower Policy by emailing [whistleblowing@stockland.com.au](mailto:whistleblowing@stockland.com.au); or
- **Anonymously** If an Employee is not comfortable with reporting to Line Management or Group Risk, they are encouraged to report the incident in accordance with the Whistleblowing Policy and via the channels available below:
  - Stockland's intranet (for Employees only)  
<https://stocklandnet.sharepoint.com/AdvisoryServices/strategicrisk/Pages/Tellme.aspx>
  - Stockland's external website (for Employees & Stakeholders)  
<https://www.stockland.com.au/about-stockland/corporate-governance/whistleblower-channel>

## 6. Policy Compliance

Failure to comply with this Policy may result in substantial fines and penalties being imposed upon Stockland, and may expose Stockland and/or its Employees to civil or criminal liability or other financial or reputational damage. It may put our Australian Financial Services (AFS) licences and other business Licences at risk. Employees who breach this Policy may face disciplinary action including dismissal.

Employees must adhere to Stockland's Escalation Policy in reporting any breach of this Policy that they are involved in or become aware of and do so in a timely manner.

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## 7. Review, Approval and Ownership

This Policy (and any material changes) is approved by the Stockland Board. Non-material changes may be approved by the Chief Legal and Risk Officer.

The General Manager – Legal Operations is the Policy Owner and is required to review the Policy:

- When applicable and appropriate, including when there are changes in business practice, legislation and compliance obligations; and
  - At least every 2 years.
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## 8. Related Policies

Stockland Code of Conduct

Fraud, Bribery and Corruption Prevention Policy

Whistleblower Policy

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## 9. Contact for Questions

Please contact the Chief Legal & Risk Officer for questions on this document.