

# Westfield Group

## Whistleblower Policy: Summary

## Whistleblower Policy

Westfield's whistleblower policy has been adopted to ensure that concerns regarding unethical, unlawful or improper conduct can be raised without fear of reprisal.

The policy applies to employees and officers of the Westfield Group, whether full-time, part-time or casual, at any level of seniority and wherever employed.

Employees are encouraged to report any genuine matter or behaviour that they honestly believe contravenes Westfield's Code of Conduct, policies or the law. Matters may include any actual or suspected:

- conduct or practices which are illegal or breach any law;
- corrupt activities;
- theft or fraud;
- misleading or deceptive conduct of any kind;
- harm to public health or safety or the health or safety of any Westfield employee.

If an employee becomes aware of any matter or behaviour that they think contravenes Westfield's Code of Conduct, policies or the law, they are encouraged to take the matter up with their immediate supervisor or manager or, in the case of employment issues, Human Resources.

Westfield has appointed Whistleblower Protection Officers in each country in which it operates. Employees are encouraged, in the first instance, to report any matter to their immediate supervisor or manager. If an employee is not satisfied with the response of their supervisor or manager (or if the matter involves their supervisor or manager), they can contact the Whistleblower Protection Officer.

When the Whistleblower Protection Officer receives a report it will inform the appropriate member of senior management (Group General Counsel and Company Secretary).

Westfield will investigate all reported concerns appropriately and will, where applicable, provide feedback regarding the investigation's outcome. Westfield will take any necessary action in response to a report and where no action is taken an explanation will be given. Where appropriate, a third party may be engaged to assist in the investigation.

Each six months a report will be made to the Westfield Group Audit and Compliance Committee summarising the whistleblower activities for the period. This report may be used to make general proposals to improve the compliance culture of Westfield. The Audit and Compliance Committee will present any findings on this report to the Board.

Any complaint which alleges criminal or fraudulent activity, a significant threat to the health and safety of employees or the public or is likely to receive media or public attention must be reported immediately by the Whistleblower Protection Officer to the Audit and Compliance Committee.

A whistleblower will not be discriminated against in their employment with Westfield for making a report nor will they be disadvantaged or the subject of reprisals for their actions in making a report.

Westfield will review this policy on an annual basis to ensure that it remains effective.