Risk Management Policy

1. Overview

The GPT Group's risk management approach incorporates culture, people, processes and systems to enable the organisation to realise potential opportunities whilst managing adverse effects.

GPT recognises the requirement for effective risk management as a core capability and consequently all employees are expected to be managers of risk.

GPT's approach to risk management is consistent with AS ISO 31000:2018: Risk Management – Guidelines and ASIC Regulatory Guide 259 – Risk Management Systems of Fund Operators.

2. Purpose

This policy is part of GPT's enterprise-wide risk management framework and sets out the principles, objectives and approaches that have been established to maintain GPT's commitment to integrated risk management.

3. Scope

This policy applies to all directors and employees in all legal entities owned, established or managed by The GPT Group and, to the maximum extent possible, to the agents and contractors that act for or on behalf of The GPT Group and its legal entities.

4. Policy

4.1 Risk Management Principles

GPT recognises that:

- Investor value is driven by taking considered risks
- Effective risk management is fundamental to achieving strategic and operational objectives
- By understanding and efficiently managing risk, the business can create and protect value and provide greater certainty and confidence for investors, employees, business partners and the communities in which GPT operates.

4.2 Risk Management Objectives

GPT's risk management objectives include the following:

- Raising the cultural awareness of risk
- Ensuring the ownership of risks and controls at all levels of the business

- Prioritising key risks to enable the business to make informed decisions and take appropriate action
- Supporting the business to validate the effectiveness of key controls
- Promoting the adoption of GPT risk management practices by associated entities and business partners.

4.3 Risk Management Approach

GPT has an active enterprise-wide risk management approach that incorporates the culture, people, processes and systems to enable the organisation to realise potential opportunities whilst managing adverse effects.

The key components of this approach include the following:

- GPT has implemented a three lines of accountability risk management model
- The GPT Board, Executive Team, employees and contractors all understand their risk management accountabilities, promote a culture of risk awareness and management, and apply risk processes to achieve the organisation's objectives
- Specialist risk management expertise is developed and maintained internally and provides second-line risk management advice and monitors compliance with the risk management policies and procedures
- Risks are identified and assessed in a timely and consistent manner
- Controls are effectively designed, embedded and assessed
- There is an established internal audit program
- Where issues are identified, action plans are put in place to address them
- The Risk Management function monitors key risk indicators and provides reports, in accordance with GPT's governing framework, confirming assurance that the risk profile is aligned with GPT's risk appetite, strategy and values.

5. Roles and Responsibilities

Role	Responsibility
GPT Board	The GPT Board is ultimately accountable for risk governance and the appropriate management of risk across GPT. The Board sets the risk appetite and oversees GPT's risk profile and risk culture to ensure activities are consistent with the strategy and values of the organisation.
GPT Funds Management (GPTFM) Board	The GPTFM Board is ultimately accountable for risk governance and appropriate management of risk in relation to the GPT Wholesale Office Fund and the GPT Wholesale Shopping Centre Fund. The GPTFM Board oversees key fund risk, sets the strategy and approves the risk appetite for each fund.

Role	Responsibility
GPT Platform Pty Ltd	Having regard to the terms of third-party arrangements entered into by GPT Platform and its duties as the holder of an AFSL and as a trustee, the GPT Platform Board is accountable for risk governance and appropriate management of risk
GPT Audit and Risk Committee (ARC)	The GPT Audit and Risk Committee supports the GPT Board. The Committee is responsible for overseeing and reviewing the effectiveness of GPT's Risk Management Framework.
GPTFM Audit, Compliance and Risk Management Committee (ACRMC)	The GPTFM Audit, Compliance and Risk Management Committee supports the GPTFM Board in the management of risk as it pertains to the GPT Wholesale Office Fund and the GPT Wholesale Shopping Centre Fund.
Executive Team	The Executive Team supports the Framework and culture of risk management at GPT, and each member is accountable for developing and promoting this within their business area. The Executive Team is responsible for appropriately managing key risks and for the ongoing maintenance of the control environment.
General Counsel	The General Counsel is responsible for designing, implementing and reporting on the adequacy of GPT's Risk Management Framework to the Board, the GPT Audit and Risk Committee and the Executive Team.
All Employees	Employees are responsible for ensuring they comply with all legislative, regulatory and company policy requirements including reporting any identified risks to the appropriate management in a timely manner. GPT is committed to effective risk management and recognises it as a core capability. All employees are expected to be risk managers. Employees who knowingly and recklessly operate outside of the Risk Management Policy or Framework will be subject to disciplinary action.

6. Related Policies, Procedures and Guidelines

- Risk Management Framework
- Risk Appetite Statement
- Code of Conduct
- Anti-Bribery, Fraud and Corruption Prevention Policy
- Health and Safety Manual
- GPT Delegations of Authority

- Whistleblower Policy
- Compliance Management Framework
- Anti-Money Laundering and Counter-Terrorism Financing Program

7. Document Control

Version	Document Owner	Author	Description	Document Approver	Approval / Revision Date
4.0	General Counsel		• Updated references from 'Chief Risk Officer' to 'General Counsel' to reflect change in structure • Added 'Ownership and Version Control' section (Section 8) • Replaced reference to 'Sustainability Risk Committee (SRC)' with 'Audit and Risk Committee (ARC)'.	Audit & Risk Committee (ARC)	October 2024
5.0	General Counsel		- No changes following review	General Counsel	October 2025
6.0	General Counsel		- Minor amendments reflecting changes in business operations - Inclusion of reference to GPT Platform	General Counsel	May 2026
7.0	General Counsel	Risk Team	- Minor drafting and administrative corrections.	General Counsel	October 2026