

CLARK Property Partners Pty Ltd

ABN 68 641 858 737

t/as CLARK Commercial | CLARK Prestige | and associated divisions

CPP-POL-10

Whistleblower Protection Policy

Version 1.2 | June 2026 | Approved: Stephen Clark, Managing Director

Defined Term

CLARK Property Partners Pty Ltd (ABN 68 641 858 737) trading as CLARK Commercial, CLARK Prestige, and associated divisions and business names is referred to throughout this Policy as "**CPP**". All references to CPP in this document apply to the entire organisation including all trading divisions, business names, personnel, directors, contractors and agents acting on behalf of CPP.

Legislative Context

This Policy reflects CPP's obligations under the Corporations Act 2001 (Cth) as amended by the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019, and applicable Queensland legislation.

CPP is committed to a culture where misconduct can be reported safely, confidentially and without fear of retaliation.

01 Policy Statement

1. Policy Statement

CLARK Property Partners Pty Ltd (ABN 68 641 858 737) trading as CLARK Commercial, CLARK Prestige, and associated divisions and business names ("CPP") is committed to maintaining the highest standards of ethical conduct across all divisions. CPP recognises that personnel, contractors, clients and other stakeholders play a vital role in identifying and reporting misconduct. This Policy establishes a safe, confidential and protected mechanism for making disclosures — and provides absolute protection from retaliation for anyone who does so in good faith.

02 Who Can Make a Disclosure

2. Who Can Make a Disclosure

The following persons may make a protected disclosure under this Policy:

- Current and former CPP employees, officers and directors
- Contractors, consultants and suppliers engaged by CPP
- Clients, tenants and other persons who have a relationship with CPP
- Relatives, dependants and spouses of any of the above

03 What Can Be Reported

3. What Can Be Reported

A protected disclosure may relate to any of the following:

- Fraud, corruption, bribery or financial misconduct
- Breach of applicable laws or regulations
- Breach of any CPP policy — including this Policy and related ESG policies
- Modern slavery concerns in CPP's operations or supply chain
- Workplace health and safety risks or breaches
- Bullying, harassment or discrimination
- Misuse of client, tenant or trust funds
- Any conduct that is dishonest, unethical or likely to cause harm to CPP, its clients, tenants or the community

04 How to Make a Disclosure

4. How to Make a Disclosure

Disclosures under this Policy should be directed to:

- Stephen Clark, Managing Director — stevec@clarkproperty.net.au — 0400 338 434

Where the concern involves the Managing Director directly, the disclosure should be made to CPP's external legal adviser or accountant, details of which are available on request.

Disclosures may be made in writing using the Disclosure Form or verbally, and may be made anonymously. CPP will make all reasonable efforts to investigate anonymous disclosures but notes that anonymity may limit CPP's ability to provide feedback to the discloser.

05 Confidentiality

5. Confidentiality

CPP is committed to protecting the confidentiality of all disclosures made under this Policy:

- The identity of a discloser will not be revealed without their consent, except where required by law
- Information relating to a disclosure will be shared only with those persons who need to know for the purposes of investigation
- All persons involved in the investigation of a disclosure are required to maintain strict confidentiality

06 Protection from Retaliation

6. Protection from Retaliation

CPP will not tolerate retaliation against any person who makes a disclosure in good faith under this Policy:

- No CPP personnel may threaten, dismiss, demote, disadvantage, harass or discriminate against any person for making a protected disclosure
- Any retaliation will be treated as serious misconduct and dealt with accordingly
- A discloser who believes they have been subjected to retaliation should report this to the Managing Director immediately
- CPP will take all reasonable steps to support and protect the wellbeing of disclosers

07 Investigation Process

7. Investigation Process

CPP will investigate all disclosures promptly, fairly and impartially:

- Receipt of disclosure acknowledged within 5 business days
- Initial assessment of the disclosure completed within 10 business days
- Full investigation conducted by an appropriate, impartial person — which may be an external investigator for serious matters
- Findings documented in writing and, where appropriate, disclosed to the discloser
- Remedial action taken where a breach is confirmed

Stephen Clark

Managing Director

CLARK Property Partners Pty Ltd

June 2026

Version 1.2

Review Due: June 2027

Policy Owner: Managing Director, CPP