

ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) & RESPONSIBLE INVESTMENT POLICY

PURPOSE

The purpose of this Policy is to set out RMBL's position in relation to responsible investment and environmental, social and governance (ESG) issues as it relates to RMBL's operations as both a Responsible Entity of the RMBL Mortgage Income Investments Scheme and as a corporate entity.

SCOPE

This Policy applies to all RMBL business operations and all directors, employees and business partners of RMBL.

DEFINITIONS

ESG Factors – Environmental, social and governance risks and opportunities that may impact the value of RMBL, its investors and/or borrowers and are identified or assessed in responsible investment processes.

Lending Guidelines – the guidelines that set out the parameters that RMBL considers when approving a new loan. All lending must be consistent with RMBL's duty in its capacity as Responsible Entity of the Fund to act in the best interests of the investors in the Fund.

POLICY STATEMENT

RMBL Investments is committed to responsible investment and the integration of ESG Factors into our investment processes and decision-making. We recognise the importance of sustainable and responsible investment practices in driving long-term value for our stakeholders, enhancing the long-term performance and resilience of our portfolio and operations, and contributing to the broader societal good.

RMBL understands that the actions we take now and the way we do business can have a significant impact on the future, both environmentally and socially. We also understand that ESG issues can greatly influence financial and investment performance over time. We aim to identify and mitigate potential ESG risks that may impact investment performance and value. The inclusion of ESG risks within our risk management framework reflects our commitment to a holistic consideration, assessment and management of enterprise and investment risks.

RMBL also believes in applying ESG standards to the operation and management of the company, and in particular our supply chain and human resource practices. Wherever possible, RMBL will choose to deal with suppliers and partners who share similar ESG policies and values. We do not knowingly procure any goods or services from suppliers involved in modern slavery or ESG practices that do not meet expected community standards. We promote a fair and equitable work environment that respects and values our employees, collaboration and diversity and is free from all forms of discrimination and harassment.

RMBL is strongly committed to positively supporting the communities we serve and the environments in which we operate and can influence. We uphold the value of stewardship in all ESG practices, to support ethical growth and societal well-being.

RMBL approaches its business with investors' interests at the heart of everything we do, to protect investors' privacy, wellbeing and to create meaningful connections and long-standing relationships. RMBL's approach to ESG aligns with our values of:

Walk the talk. We act with authenticity, integrity and professionalism. We expect and promote ethical conduct, regulatory compliance, responsible and transparent decision-making, and strong governance practices in all our business operations and dealings.

We care. We demonstrate a commitment to healthy and enduring relationships. We are committed to building and maintaining strong relationships with our investors, borrowers and other stakeholders and ensuring the sustainability of these relationships by addressing environmental and social issues that reflect our stakeholders' values and expectations.

Be better. We demonstrate a commitment to innovation and continuous improvement. Long-term success for our company and stakeholders is dependent on consideration of ESG Factors and ensuring risks and opportunities across our business operations and lending activities are identified and managed, and ESG practices are adopted and continuously improved upon.

Value diversity. We respect and welcome diversity of thought, collaboration and inclusion. Regularly engaging, seeking input and feedback from our employees, investors, borrowers and broader stakeholder group is critical to ensure we are aligned and able to adapt our approach to meet evolving expectations and requirements.

1. Responsible Investment

RMBL has a responsibility to act in the best interests of our investors in our Fund. We recognise that ESG Factors can significantly influence financial and investment performance over time. Therefore, we are committed to integrating ESG principles and considerations into our investment activities.

In 2023 RMBL became a signatory to the United Nations supported Principles for Responsible Investment (PRI), signifying our commitment to learning, adopting and improving our responsible investment practices. As a signatory RMBL commit to the following key principles:

Principle 1: We will incorporate ESG issues into investment analysis and decision-making processes.

Principle 2: We will be active owners and incorporate ESG issues into our ownership policies and practices.

Principle 3: We will seek appropriate disclosure on ESG issues by the entities in which we invest.

Principle 4: We will promote acceptance and implementation of the principles within the investment industry.

Principle 5: We will work together to enhance our effectiveness in implementing the principles.

Principle 6: We will each report on our activities and progress towards implementing the principles.

1.1 RMBL's Lending Guidelines

RMBL's Lending Guidelines reflect our commitment to ESG and we encourage and support our borrowers to consider and adopt best practice environmental and social standards. ESG considerations are documented in Loan Approval Forms and Credit Committee Memorandums where relevant, and the Credit Committee has regard to how these matters impact on the viability and/or sustainability of the project and therefore the credit risk for the loan. As a credit investment manager in commercial real estate, it may not always be possible for us to influence the outcome of developments and projects from an ESG perspective, however where possible we integrate ESG Factors into our investment process and encourage adoption of ESG standards, for example, we:

- (a) Enquire into the use of properties being used as security properties and encourage borrowers to consider appropriate environmental measures in line with contemporary environmental and social guidelines; and
- (b) Encourage our borrowers (developers) and as required, review environmental recommendations and requirements pertinent to the proposed developments, such as energy ratings for new housing, social housing components in developments, and the use of green space to enhance utility and health of future residents.

Furthermore, subject to meeting lending guidelines, we look favourably on new loan proposal projects that include:

- High NABERs (National Australian Built Environment Rating System) or similar ratings;
- Minimal carbon footprint or carbon neutrality;
- Acquisition of property that has sustainable native habitat (subject to appropriate environmental audit or report) that is to be used to support nature (biodiversity) offsets for developments;
- Social housing projects including those under NDIS support; and
- Environmentally sustainable and energy efficient commercial and residential developments.

Exclusions

RMBL does not accept property as security or lend to borrowers that operate in certain industries due to the risk to our fund and ESG principles that we uphold. We negatively screen out any security or potential loan to borrowers that operate in the following industries:

- (a) Production and/or sale of military equipment, firearms or ammunitions;
- (b) The production, storage or transportation of nuclear or radioactive material (excluding medical products);
- (c) Production and/or sale of illegal products;
- (d) Adult entertainment venues, brothels and sale of pornography;
- (e) Industries that do not comply with labour conditions; and
- (f) Industries that do not comply with current environmental guideline and licensing requirements.

2. Environmental Factors

RMBL recognises the increasing risks and opportunities associated with climate change, particularly as it relates to our lending activities, and the effects those risks and opportunities have on our operations. We understand that our main influence on climate-related risks and opportunities is through the loans issued to our borrowers and that as a non-bank lender, we can influence the sector's transition to a low-emissions future through innovative and responsible financing solutions.

RMBL's Business Operations

In our own business operations, RMBL has the following in place to reduce our impact on the environment:

- (a) Operating from an office that has a 6-star energy rating;
- (b) Encouraging and promoting the use of technology over paper and unnecessary printing in all areas of the business. For example, using an electronic workflow system to manage payments, using an online document execution system and reducing the need for printed material.
- (c) Offering investors and borrowers the option to complete electronic or online application forms and receive communication and statements to be sent via email to reduce the need for paper-based communications and transactions.
- (d) Providing a self-service portal for investors and borrowers to easily access their investment and loan documentation, thereby reducing the need for printing and contributing to more sustainable business operations.

3. Social Factors

RMBL believes that social considerations are of critical importance in fostering a sustainable and ethical business environment. We are committed to the following social principles and ensuring they are instilled in our operations.

Diversity, Equity and Inclusion

For RMBL diversity means the range of different and unique characteristics among people and how they identify- this can include, but is not limited to, race, ethnicity, gender, age, marital or family status, education, religion, disability, sexual orientation and socio-economic background.

We believe that diversity of thought, collaboration and inclusion leads to innovative problem-solving and better decision making. We respect and welcome difference, recognising the unique contributions that individuals make, as well as ensuring our workplace is one where people can feel heard, valued and respected. As such, we seek to attract, recruit, develop and retain our people in a culture that embraces individual differences.

We are committed to upholding our workplace environment and support inclusion and well-being through company-wide policies including our Code of Conduct, Workplace Respect Policy, Workplace Health & Safety Policy, Flexible Working Policy, Leave Policy, Parental Leave Policy and Study Assistance Policy. In addition, we have activities and programs in place that support our employees and foster well-being including regular opportunities to socialise and engage, company supported participation in charitable and well-being activities, subsidised gym memberships and access to an independent Employee Assistance Program.

Human Rights and Modern Slavery

RMBL recognises its responsibility to uphold human rights standards and believe we have an obligation to avoid infringing upon any human rights.

We are committed to supporting human rights and combating modern slavery by having an approach in place to identify and mitigate human rights and modern slavery risks in our operations and supply chain. We also recognise the risk that our provision of capital to other entities may indirectly contribute to modern slavery. Hence knowing our suppliers and borrowers, undertaking due diligence, and ongoing monitoring are ways in which we ensure we can understand and address modern slavery risks.

Other company practices in place to support human rights include:

- Ensuring that our recruitment, performance management, remuneration and promotion practices are free from discrimination based on race, gender, age and other protected characteristics.
- Safeguarding our clients' and employees' personal information against unauthorised access and misuse, complying with the Australian Privacy Principles.
- Ensuring fair labour practices are in place including fair wages, safe working conditions and reasonable working hours for our employees.

Our company-wide policies that address human rights considerations include Code of Conduct, Workplace Respect, Social Media, Privacy - Personal Information, Privacy - Credit Information, IT Security and Modern Slavery.

Sponsorship Programs and Community Volunteering

RMBL provides financial support for a range of health and community-based organisations, via the RMBL Foundation and RMBL sponsorships. Sponsorships and donations are generally made to organisations that have some connection or meaning to RMBL employees, investors or borrowers.

By sponsoring these organisations which are predominantly locally based, we are having a direct positive impact on our local community. In addition, each employee can take up to two days paid leave to volunteer in the community.

Monetary as well as volunteer support is provided in accordance with RMBL's Giving Policy which sets out the criteria used to determine where funds and time is allocated. RMBL's Executive Committee approves the allocation of sponsorship funds and volunteer organisations.

Reconciliation

RMBL is committed to supporting Indigenous reconciliation and acknowledging the importance of recognising and respecting the cultures, histories, and contributions of Aboriginal and Torres Strait Islander peoples. While we do not have a formal Reconciliation Action Plan (RAP) or notable influence in this area, we are dedicated to fostering an inclusive environment and promoting awareness and understanding within our organisation. We believe that small actions can contribute to broader reconciliation efforts and we are open to learning and supporting Indigenous communities respectfully and meaningfully.

4. Governance Factors

RMBL is committed to maintaining the highest standards of integrity, transparency, and accountability in all our business operations. We strive to uphold robust governance practices that ensure effective oversight, ethical decision-making, and compliance with all relevant laws and regulations. By fostering a culture of openness and responsibility, we aim to build trust with our stakeholders, support sustainable growth, and enhance long-term value for our investors, employees, and the broader community.

RMBL's ESG Working Group consisting of executive committee members, risk and compliance team members and other employees across the company, drives our commitment to ESG principles and supports the identification and implementation of ESG practices within our business operations. The assessment of material ESG risks and opportunities and their impacts on the business strategy is undertaken by the Working Group on an annual basis. ESG progress and updates are reported to the Executive Committee as a standard agenda item.

Risk Management and Compliance

RMBL is committed to having appropriate risk management and compliance practices in place to protect our business and stakeholders from financial losses and reputational damage. Our compliance processes focus on adherence to regulatory requirements, RMBL's Constitution and Compliance Plan.

RMBL's policies that establish and reinforce our governance, risk and compliance standards and activities include Risk Management Strategy, Anti-Money Laundering & Counter Terrorism Financing, Complaints, Conflicts of Interest, Delegations of Authority, Incidents & Breaches, Whistleblower and Accounting & Financial Reporting. These policies are supported by compulsory training for all staff where relevant.

5. Stewardship and Engagement

RMBL's stewardship objective is to actively integrate ESG principles into our investment and business practices to promote sustainability, enhance long-term value, and foster responsible corporate citizenship. We aim to achieve this by engaging with stakeholders, monitoring ESG performance, and continuously improving our practices to meet evolving standards and expectations.

Our membership and engagement in industry and other relevant organisations assists our ability to stay updated on industry trends, best practices and regulatory developments, supporting our collective knowledge and development of ESG Factors.

We are committed to regularly engaging with our investors and borrowers, both formally and informally, to seek their opinions and feedback through a range of channels. This includes engaging third parties to conduct research to understand our investor experience and expectations, including those related to ESG considerations, undertaking an ESG materiality assessment and applying these insights and learnings to improve our business and investment practices.

RESPONSIBILITY

The Board is responsible for approval of this Policy and for considering the ESG principles set out in this Policy when reviewing matters brought to the attention of the Board and confirming that management considers the principles in their decision making.

The Executive Committee is responsible for addressing the ESG principles set out in this Policy in its decision making and in aligning strategic projects with those principles.

The Senior Manager, People & Culture is responsible for maintenance and monitoring of this Policy, as well as approving non-material changes to this Policy.

All employees are required to follow the requirements of this Policy.

RELATED POLICIES

- Accounting & Financial Reporting
- Anti-Money Laundering & Counter Terrorism Financing (AML & CTF)
- Code of Conduct
- Complaints
- Conflicts of Interest
- Delegations of Authority
- Flexible Working
- Giving Policy
- Incidents & Breaches
- IT Security
- Leave
- Lending Guidelines
- Modern Slavery
- Parental Leave
- Privacy – Credit Information
- Privacy – Personal Information
- Risk Management Strategy
- Social Media
- Study Assistance

- Whistleblower
- Workplace Health & Safety
- Workplace Respect

APPROVAL AND REVIEW DETAILS

This Policy will be reviewed on an annual basis and is designed to be an iterative document that develops and evolves over time.

Version:	2		
Approved by:	RMBL Investments Ltd Board	Date:	September 2024
Next Review Date:	September 2025		

VERSION HISTORY

Version Number	Amended By	Details of Changes
1	Hayley Pope, Head of Risk and Compliance	Creation of Policy
2	Anne-Maree Nunan, Senior Manager, People & Culture	Complete review and rewrite of policy incorporating responsible investment