

WINTON

ENVIRONMENT AND CORPORATE RESPONSIBILITY POLICY

Purpose

This policy is designed to ensure that actions of Winton Land Limited and its subsidiaries (together the **Group**) support our ability to create long-term value for ourselves and for others.

Sustainability Framework

The Group will use the commitments within the Sustainability Framework as guiding principles across its business operations.

Environment

Winton must develop and build to adapt to the physical risks of climate change and protect the natural environment in which it operates. Accordingly, at a minimum:

1. the Group's operations are to comply with relevant statutory and regulatory requirements;
2. the Group will regularly monitor its environmental performance, objectives and targets and ensure that support functions exist to effectively maintain and continually improve environmental standards;
3. the Group must ensure that environmental care is important to every facet of the Group's management and operations; and
4. the Group will continue to promote individual commitment to safe and environmentally responsible behaviour through the training and education of, and dissemination of information to, all relevant team members.

Community & Suppliers

The Company prides itself on adding social value to enable people within its reach, including residents within Winton communities, customers, employees, and contractors, to thrive. It has established relationships with other key stakeholders including local councils, Iwi, industry bodies, suppliers and investors.

The Group's contractors and suppliers include a range of organisations across different regions. While the Company has a relatively small team, it works with many contractors on each site to develop the land and construct homes and commercial spaces. A non-price attributes assessment to reflect historical performance in areas like health and safety, environmental conduct and performance during the tender process to select contractors. Onsite contractors are required to report health and safety information on an ongoing basis and are further required to regularly report on their waste and fuel usage.

Policy Review

The Board will review this policy as required and at least every two years.

Last reviewed: August 2026