

Whistleblower Policy Summary

This summary has been designed to give you an overview of our Whistleblower Policy (the “Policy”). The full Policy is available below.

This Policy ensures that those who report a concern can do so without being subject to detrimental treatment. It provides a mechanism to encourage, protect and support the reporting of incidents of misconduct, fraud, questionable accounting, inappropriate behaviour or any other conduct inconsistent with our values or policies.

Who does this Policy cover?

This Policy applies to an individual who is (or has been) a Lifestyle Communities employee, a supplier (including their employees) of goods or services to Lifestyle Communities or a relative, spouse or dependent of either.

What can be reported?

As a general rule, a reportable incident under our Policy would include any conduct that constitutes fraudulent activity, is dishonest, corrupt or illegal or contravenes the Corporations Act, the ASIC Act 2001 (Cth), the Competition and Consumer Act 2010 (Cth) or the Income Tax Assessment Act 1936 (Cth). A more comprehensive list is set out in section 8 of the Policy.

Who should you report an incident to?

There are a number of channels through which you can report a suspected incident including:

Confidential Whistleblower Hotline (independent service: YourCall)	Internet: www.yourcall.com.au/report (24/7) Free call (within Australia): 1300 790 228 (9.00am to 12.00am AEST Mon-Fri, excluding public holidays) Quote Organisation ID: LIC
Whistleblower Protection Officers	Angela Farbridge-Currie – Chief Financial Officer Elect Angela.FC@lifestylecommunities.com.au Simône de la Harpe – Executive General Manager – Experience (People & Communities) Simone.delaharpe@lifestylecommunities.com.au Free call (within Australia): 1300 50 55 60
Any member of the Leadership Team, the Board of Directors or a Company Secretary	Free call (within Australia): 1300 50 55 60 for contact details
Lead Statutory Auditor	PwC (external), Melbourne Marcus Laithwaite - Partner marcus.laithwaite@au.pwc.com

Investigation

If required, an investigation will take place as soon as possible. All investigations will be conducted in a fair and independent manner and you will be updated on the matter as appropriate.

Protection for Disclosers

All reasonable steps will be taken by Lifestyle Communities to ensure that disclosers do not suffer detrimental treatment. Detrimental treatment includes dismissal, injury, demotion, discrimination, harassment, intimidation, disciplinary action, bias, threats or other unfavourable treatment. Disclosers may also have statutory protections which are outlined in the full Policy.

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Whistleblower Policy

1 Objective

- 1.1. Lifestyle Communities Ltd (“**Lifestyle**” or the “**Company**”) promotes and supports a culture of good corporate governance and values a workplace culture with open communication about our business practices.
- 1.2. This Policy has been developed in alignment with our values and aims to ensure that we observe the highest standards of integrity, corporate governance and risk management.
- 1.3. It provides a mechanism to encourage, protect and support the reporting of incidents of misconduct, fraud, questionable accounting, inappropriate behaviour or any other conduct inconsistent with our values or policies. It also tells our employees and suppliers that they can raise concerns regarding any wrongdoing in our business safely, securely and with confidence that they will be protected and supported.
- 1.4. Nothing in this Policy is intended to restrict a person from disclosing Disclosable Conduct, providing information to, or communicating with a government agency, law enforcement body or a regulator in accordance with any relevant law, regulation or prudential standard applicable in a jurisdiction in which Lifestyle Communities operates.

2 Purpose

- 2.1. This Policy aims to:
 - (a) promote transparency and ethical conduct within Lifestyle Communities by encouraging employees and suppliers to report potential misconduct;
 - (b) outline Lifestyle Communities’ mechanisms for reporting issues and investigating disclosures;
 - (c) fulfil our obligations under, and promote the operation of, the whistleblower laws under the *Corporations Act 2001 (Cth)* and the *Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)* (“**Whistleblower Laws**”)¹; and
 - (d) provide details of the protections available to individuals who report a concern under the Whistleblower Laws to ensure that they can do so without being subject to detrimental treatment.

3 Associated Policies and Procedures

- 3.1. This Policy operates independently of Lifestyle Communities’ other policies and procedures and applies only to disclosure of Disclosable Conduct.

4 Scope

- 4.1. This Policy applies to disclosures made by eligible Disclosers, as described in Section 7 of this Policy.
- 4.2. Disclosures relating to personal, work-related grievances (such as a disagreement between two employees or a decision about promotion) generally fall outside the scope of this Policy.

5 Roles and Responsibilities

- 5.1. The following roles and responsibilities are created in relation to disclosures reported under this Policy:

¹ Please note that there are slight differences between the whistleblower protections that exist under the Corporations Act 2001 (Cth) and the whistleblower protections that exist under the Taxation Administration Act 1953 (Cth). Please read this policy carefully before making a disclosure to ensure that you understand what is required for you to be afforded regulatory protection.

Eligible Recipient	A person to whom a Discloser is able to make a disclosure and qualify for protection under this Policy and the Whistleblower Laws.
Whistleblower Protection Officer (“WPO”)	A person appointed to receive disclosures, manage the process for actioning disclosures made under this Policy, and to safeguard the interests of Disclosers (see section 12.1 for further details on the role of the WPO). An Alternate WPO has also been appointed to act as WPO in circumstances in which the disclosure relates to the WPO, or in which the WPO is unavailable.
Whistleblower Investigation Officer (“WIO”)	A person appointed to carry out or supervise an investigation into a disclosure (see section 10)

6 Protected Disclosures

- 6.1. A disclosure will be protected under Whistleblower Laws (as a “**Protected Disclosure**”), if:
- (a) it is made by one of the persons listed in section 7 of this Policy (“**Discloser**”); and
 - (b) the Discloser has reasonable ground to suspect the information he or she is disclosing concerns Disclosable Conduct set out in section 8 of this Policy; and
 - (c) the disclosure is made to one of the Eligible Recipients or other persons listed in section 9 of this Policy.
- 6.2. Anonymous disclosures may still be Protected Disclosures. The Discloser can still qualify for protection even if the disclosure turns out to be incorrect.

7 Who Can Make a Disclosure?

- 7.1. The following persons (in a current or previous capacity) may make a disclosure under this Policy to qualify as ‘**Disclosers**’:
- (a) ‘officers’ of Lifestyle Communities (including a director or company secretary);
 - (b) employees of Lifestyle Communities (including permanent, part-time, fixed or temporary employees);
 - (c) suppliers of services or goods to Lifestyle Communities (whether paid or unpaid), and employees of these suppliers;
 - (d) associates² of Lifestyle Communities (for example a person with whom Lifestyle Communities acts in concert); or
 - (e) a relative, dependent or spouse of any of the above.
- 7.2. A person who makes a report but is not a Discloser under this Policy will not qualify for the statutory protection as a whistleblower under the Whistleblower Laws.

8 What Can Be Disclosed?

8.1. Disclosable Conduct

² In relation to tax disclosures, references to an ‘associate’ means an associate within the meaning of section 318 of the *Income Tax Assessment Act 1936*

8.1.1. To make a disclosure under this Policy and qualify for protection as a whistleblower under the Whistleblower Laws, the Discloser must have reasonable grounds to suspect that the information disclosed concerns a Disclosable Conduct.

8.1.2. Reports that do not relate to Disclosable Conduct are not covered by this Policy and will not qualify for protection under the Whistleblower Laws. However, we do still encourage you to raise those issues through your line manager, the Executive Leadership Team or the Head of People Experience.

8.1.3. **'Disclosable Conduct'** under the Corporations Law is conduct that:

- (a) concerns misconduct or an improper state of affairs or circumstances in relation to Lifestyle Communities;
- (b) indicates that Lifestyle Communities, or any of its officers or employees, has engaged in conduct that:
 - i. breaches the Corporations Act, ASIC Act, Banking Act, Data Collection Act, Insurance Act, Life Insurance Act, National Consumer Credit Protection Act or Superannuation Industry (Supervision) Act (or regulations made under those laws);
 - ii. constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
 - iii. represents a danger to the public or the financial system; or
 - iv. is otherwise prescribed by regulations made under the Corporations Act from time to time; or
- (c) may be of a serious enough nature to warrant disclosure even though it may not be in breach of particular laws (for example conduct that whilst not unlawful may indicate a 'systemic issue').

8.1.4. It is not possible to provide an exhaustive list of activities that can be reported under this Policy, but by way of guidance, Disclosable Conduct may include situations in which Lifestyle Communities or one of its officers or employees has engaged in:

- (a) dishonest behaviour or fraudulent activity;
- (b) unlawful, corrupt or irregular use of company funds or practices (including money laundering, misappropriation of funds or bribery);
- (c) illegal activities (including theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage against property);
- (d) unethical behaviour, including anything that would breach Lifestyle Communities' Code of Conduct and other policies;
- (e) improper or misleading accounting or financial reporting practices and other financial irregularities, including tax avoidance behaviour;
- (f) behaviour that is oppressive, discriminatory or negligent;
- (g) an unsafe work-practice or behaviour that poses a serious risk to the health and safety of any person at the workplace;
- (h) systemic failures within Lifestyle Communities;
- (i) any other conduct which may cause loss to Lifestyle Communities or be otherwise detrimental to Lifestyle Communities' interests.

8.2. Disclosures relating to tax affairs

8.2.1. The Taxation Administration Act 1953 also provides protection for disclosures of information which indicates an improper state of affairs or circumstances in relation to the tax affairs of Lifestyle Communities or an associate of Lifestyle Communities or may assist the Eligible Recipient to perform functions or duties in relation to the tax affairs of Lifestyle Communities or an associate of Lifestyle Communities. “Tax affairs” means affairs relating to any tax imposed by or collected under a law administered by the Commissioner of Taxation (eg: income tax, GST, PAYG withholding etc.)

8.2.2. Protection is provided for disclosures made to the Commissioner of Taxation or any person or agency specified in section 9.1 of this Policy. The protections available to an individual making a protected disclosure under the Taxation Administration Act 1953 are the same as those outlined in section 12.2.

8.3. Exclusion of personal work-related grievances

8.3.1. In general, personal work-related grievances are expressly excluded from the definition of Disclosable Conduct under this Policy and will be managed under Lifestyle Communities’ workplace policies. These matters should instead be raised with your manager in the first instance or the People Experience team.

8.3.2. Personal work-related grievances include matters relating to the Discloser’s own employment (or former employment) and which primarily have implications for the Discloser personally, for example:

- (a) an interpersonal conflict between the Discloser and another employee;
- (b) a decision in relation to the Discloser’s engagement, transfer or promotion;
- (c) a decision relating to the Discloser’s terms and conditions of engagement; or
- (d) a decision to suspend and terminate the Discloser’s engagement, or otherwise to discipline the Discloser.

8.3.3. These matters can be raised through Lifestyle Communities employee Complaint Resolution Process.

8.3.4. However, personal work-related grievances may still qualify as Disclosable Conduct if they also raise significant implications for Lifestyle Communities, for example:

- (a) the disclosure includes information about Disclosable Conduct beyond the Discloser’s own circumstances and happens to be accompanied by a personal work-related grievance (mixed report);
- (b) if the Discloser suffers, or is threatened with, detriment for making a disclosure;
- (c) the Discloser seeks legal advice or legal representation about the operation of the Discloser protections under the Corporations Act; or
- (d) if the Discloser makes a report about other Disclosable Conduct they have observed or been affected by.

9 How To Make a Report?

9.1. Who to approach to make a report

9.1.1. In the first instance and if appropriate, Lifestyle Communities encourages employees to make disclosures to their manager, so that Lifestyle Communities can identify and address any wrongdoing as early as possible.

9.1.2. Notwithstanding this, a Discloser may at any time make a report of Disclosable Conduct to any of the following persons to qualify for protection under the Whistleblower Laws (**‘Eligible Recipients’**).

A. Eligible Recipient	<ul style="list-style-type: none"> • the confidential Whistleblower Hotline, YourCall, appointed by Lifestyle Communities as a disclosure management service provider. YourCall will provide details of any disclosures to the WPO; or
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	<ul style="list-style-type: none"> • the WPO; or • an officer or senior manager of Lifestyle Communities, (including a director or Company Secretary, Chief Executive Officer, Chief Financial Officer, or a member of the Leadership Team); or • the Lifestyle Communities’ Statutory Auditor, or a member of their audit team. <p>Any disclosure received by an internal Eligible Recipient should be promptly forwarded to the WPO. By making a disclosure to an Eligible Recipient, the Discloser consents to the detail of the report (including their identity unless they have elected to remain anonymous) being disclosed to the WPO as set out further in section 10.</p> <p>While a disclosure can be made to any officer or senior manager (within the meaning of the <i>Corporations Act</i>) to retain the protection under the Whistleblower Laws, we encourage disclosures for the purpose of this Policy to be made to the Whistleblower Hotline or designated WPO so that the disclosure can best be handled in accordance with this Policy.</p> <p>Contact details for Eligible Recipients are set out on the cover of this Policy.</p>
B. Prescribed Bodies	<p>Although Lifestyle Communities’ preference is that a Discloser first contact an Eligible Recipient, the Discloser may also choose to make a report of Disclosable Conduct directly to a ‘Prescribed Body’.</p> <p>Prescribed Bodies include ASIC (including through its online ‘misconduct reporting form’ referred to in ASIC Information Sheet 239), APRA, the ATO (including through its online ‘tip-off form’ referred to in it tax whistleblower information) or any prescribed Commonwealth authority.</p>

9.2. Speaking to a legal practitioner

9.2.1. A Discloser may also engage a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of this Policy or the Whistleblower Laws and still qualify for the protections set out in this Policy.

9.3. Public interest and emergency disclosures

9.3.1. The Corporations Act also provides protection for public interest disclosures and emergency disclosures which meet specific requirements prescribed under the Act. If an external report is made to a Prescribed Body and:

- (a) after 90 days, the Discloser has reasonable grounds to believe that the Prescribed Body is not taking action to address the matters reported, the Discloser has reasonable grounds to believe that making a further disclosure of the information would be in the public interest, and the Discloser has provided the Prescribed Body with written notification that it intends to make a public interest disclosure; or
- (b) the Discloser has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment and the Discloser has provided the Prescribed Body with written notification that it intends to make an emergency disclosure,

9.3.2. The Discloser can make a ‘public interest disclosure’ or an ‘emergency disclosure’ (as applicable) to a Member of Parliament or a journalist, and such a disclosure will qualify for protection under the Whistleblower Laws.

9.4. How to make a report

9.4.1. A disclosure can be made at any time (including out of normal business hours) either verbally or in writing, by one of the following means:

(a) **through the Whistleblower Hotline (“Your Call”) via:**

- the **Website:** www.your-call.com.au any time 24/7.

To complete an online report, log onto the “Your-Call” website and click on the “make a secure report” button. Follow the prompts after entering Lifestyle Communities’ ID: LIC to supply information in an electronic form. You will be able to securely upload any relevant documentation and/or material relevant to your disclosure.

- by **calling 1300 790 228** between 9.00am and 12.00am AEST Monday to Friday (excluding public holidays).

9.4.2. Your Call facility is available to employees and contractors (including their relatives, spouses or dependants). After making a disclosure, the Discloser will be provided with a unique Disclosure Identification Number (DIN) and access to a secure online Message Board.

9.4.3. The Message Board allows ongoing anonymous communication with Your Call and/or Lifestyle Communities. Your Call remains the intermediary at all times, receiving and forwarding communication between all parties. The Message Board can be used to receive updates, share further information/evidence and request support or report retaliation. If the Discloser cannot access the Message Board, they can contact Your Call via phone (above) for verbal updates.

National Relay Service

9.4.4. If a Discloser is deaf, or have a hearing or speech impairment, they can contact Your Call online or through the National Relay Service. Simply choose the contact method at www.relayservice.gov.au and request Your Call’s hotline 1300 790 228.

9.4.5. If a Discloser has difficulty speaking or understanding English, they can contact Your Call through the Translating and Interpreting Service (TIS) 131 450 and ask for Your Call on 1300 790 228.

(b) **by an email or phone call to any of the Eligible Recipients listed in section 9.1 above.**

9.4.6. Information received from a Discloser via these channels will be kept confidential to the extent possible subject to Lifestyle Communities’ investigation procedure set out in section 10 of this Policy, and action required to meet legal and statutory obligations. In making a disclosure under this Policy, the Discloser consents to the disclosure being reported in accordance with the procedures set out in Section 10 of this Policy.

9.4.7. At the time of making the disclosure, the Discloser should indicate whether they consent to the Eligible Recipient (including Your Call) disclosing their identity to other persons, including the WPO, the investigating team, the Chief Executive Officer and the Board. Lifestyle Communities may not be able to properly investigate a report without this consent.

9.4.8. A Discloser making a disclosure under this Policy will be taken to have consented to their identity being shared to these limited persons for the purpose of this Policy unless they positively indicate that they wish to remain anonymous.

9.4.9. A Discloser may make a report anonymously and Lifestyle Communities will respect their right not to be identified. If they choose to make the report anonymously, it may mean that any investigation could be limited.

9.5. Deliberately False and Reckless Disclosures

9.5.1. Disclosure may have serious consequences, including potential damage to the personal reputation and career prospects of the person(s) who are the subject of allegations of wrongdoing.

9.5.2. In reporting Disclosable Conduct, a Discloser must have reasonable grounds to suspect that the matter/information falls within the definition of Disclosable Conduct and is truthful and accurate. Where it is shown that a person has knowingly made a false report, or makes a report without reasonable grounds as to truth or accuracy, that false report is considered a serious breach of company Policy and the person responsible may be subject to appropriate disciplinary action.

10 Investigations into Disclosable Conduct

10.1. Decision whether to investigate a Disclosure

10.1.1. Disclosures by Eligible Recipients will be passed onto the WPO. The WPO will ensure that all disclosures are taken seriously and treated fairly and in accordance with this Policy.

10.1.2. If the disclosure relates to the WPO, CEO or a Director, it will be directed to the Chair of the Board or the Chair of the Audit & Risk Committee as Alternate WPO.

10.1.3. The WPO, in consultation with any independent advisors they deem necessary, will review the disclosure to establish whether it is a Protected Disclosure within the terms of this Policy and decide the appropriate course of action, which could include:

- (a) determining that the disclosure warrants further investigation based on the information received and appointing a WIO for investigation; or
- (b) determining that the claim/report is baseless and that no formal investigation is warranted, and notifying the Discloser via the most appropriate means to inform them of this outcome.

10.1.4. The WPO will also:

- (a) assess whether there is potential for retaliatory conduct being taken against the Discloser and take measures it considers necessary to protect the Discloser from retaliatory conduct;
- (b) set indicative timeframes for the investigation including updates to the Discloser during the investigation.

10.1.5. Non-qualifying reports may still be investigated by Lifestyle Communities outside the terms of this Policy.

10.2. Process for Investigation

10.2.1. The investigation process followed will depend on the nature and circumstances of the disclosure. Nonetheless, all investigations will follow a process similar to the one described below:

- (a) the WPO will appoint a WIO who has the necessary skills and knowledge to undertake such an investigation and who is sufficiently independent of the area, department and individuals named in the disclosure. The WIO may be a senior employee of Lifestyle Communities or an external person.
- (b) if a disclosure relates to the WPO or a director, it will be directed to the Chair of the Board or Audit Committee as Alternate WPO who will determine how to proceed, appoint the WIO and oversee the investigation.
- (c) If the WPO determines that an investigation is not warranted, the WPO will submit a report to the Chair of Board and Chief Executive Officer explaining their rationale for not investigating the disclosure.

- (d) The Investigator will undertake an objective investigation and will obtain specialist independent advice where necessary. All Lifestyle Communities employees are required to assist the Investigator to the maximum extent possible within the law.
- (e) All reasonable steps will be taken to ensure that the investigation is conducted in a thorough, fair, timely and independent manner, and in accordance with the principles of natural justice.
- (f) Once the investigation is complete, the Investigator will submit a report to the Chair of the Board, Chief Executive Officer and the WPO (unless one or more of those members is named in the disclosure) setting out the results of the Investigation and a summary of the evidence. Findings will be made on the balance of probabilities and it may be that an allegation of Disclosable Conduct is fully substantiated, partially substantiated, not able to be substantiated, or disproven.

10.3. Updates to Discloser

- 10.3.1. Where the identity of the Discloser is known, the WPO will ensure that the Discloser is kept informed of the outcomes of the investigation in a timely manner subject to the considerations of privacy of those against whom the disclosure is made. Where a Discloser has made a disclosure anonymously via Your-Call, this information will be loaded onto Your-Call to allow the individual to anonymously access the file to receive an update on the investigation.
- 10.3.2. The WPO will endeavour to inform the Discloser of the final findings of the investigation where appropriate, however, the Discloser will not be entitled to receive a copy of the formal report.

10.4. Review of investigation findings

- 10.4.1. If the Discloser is not satisfied with the outcome of an investigation, they may make a request to the WPO that a review be conducted or lodge a complaint with a regulator, such as ASIC or APRA. If the WPO determines that a review should be conducted, it will be conducted by an investigator who was not involved in the original handling and investigation of the disclosure. Please note that Lifestyle Communities is not obliged to reopen an investigation.

11 Confidentiality

- 11.1. Confidentiality is of vital importance to encourage people to speak up and raise concerns. Lifestyle Communities will take all reasonable steps to protect the identity of a Discloser and, within the constraints of the requirement to investigate, maintain confidentiality over the subject matter.
- 11.2. Details of the framework established by Lifestyle Communities to protect the identity of the Discloser are set out in sections 9.4 and 12.4.
- 11.3. Depending on the nature and circumstances of the disclosure, it should be acknowledged that the information in the disclosure may need to be disclosed, where reasonably necessary for investigating the issues raised, to:
 - (a) the WPO;
 - (b) officers of Lifestyle Communities and other employees on an “as needs basis”
 - (c) persons against whom allegations are made in the disclosure
 - (d) external advisors; and/or
 - (e) relevant authorities, including law enforcement agencies, or as otherwise required by law.
- 11.4. Although we will not disclose your identity unless you give consent, it is possible that the details of the Protected Disclosure may lead others to believe that they know the identity of the whistleblower. Steps we will take to maintain confidentiality and anonymity of the Discloser are set out in section 12.4. Nothing in this Policy prevents Lifestyle Communities or any person from disclosing information required by law.

12 Protections For Disclosers

12.1. Role of the Whistleblower Protection Officer (WPO)

12.1.1. Lifestyle Communities has appointed a WPO to safeguard the interests of Disclosers making reports under this Policy and ensure the integrity of the reporting mechanism. In particular, the WPO is responsible for:

- (a) maintaining the privacy and confidentiality of the Discloser;
- (b) ensuring that all valid claims are taken seriously and investigated fairly;
- (c) keeping the Discloser informed of developments, including progress and outcome of the investigation;
- (d) upon receiving a disclosure, making an assessment of the risk to the Discloser of any detrimental treatment occurring, and implementing any necessary procedures to appropriately address this risk; and
- (e) monitoring the effectiveness of protections offered under this Policy.

12.1.2. The WPO can be contacted in relation to any queries on the reporting and investigation processes under this Policy.

12.2. Statutory Protections

12.2.1. The Corporations Act 2001 and the Taxation Administration Act 1953, provide protections for Disclosers who make Protected Disclosures, including:

- (a) the right to have their identity protected in accordance with the provisions of that legislation;
- (b) the right to have information provided as part of the disclosure handled in accordance with the provisions of that legislation;
- (c) the right to be protected from civil, criminal or administrative liability (including disciplinary action) for making disclosure, from contractual or other remedy on the basis of the disclosure and from the admissibility of the information provided in evidence against the person, in each case in accordance with the provisions of that legislation;
- (d) the right to be protected from detrimental treatment or any form of victimisation in accordance with the provisions of that legislation;
- (e) the right to compensation and other remedies in accordance with the provisions of that legislation (including a right not to be required to pay costs incurred by another person when litigation is commenced);
- (f) the right not to be required to disclose their identity before any court or tribunal in accordance with the provisions of that legislation.

12.2.2. Any questions about these protections should be directed to the WPO.

12.3. Protection for emergency disclosures, disclosures to legal practitioners and public interest disclosures

12.3.1. Separate protection criteria apply to emergency disclosures, disclosures to legal practitioners and public interest disclosures. Emergency disclosures or public interest disclosures are disclosures made to journalists or members of Parliament.

12.3.2. It is important that the Discloser understand the criteria for making a public interest or emergency disclosure and they should contact an independent legal advisor before making a public interest or emergency disclosure. For further information, the Discloser can contact ASIC.

12.4. Anonymity of a Discloser

- 12.4.1. When making a report, the Discloser can choose to do so anonymously and may request that their identity be kept confidential and claim details de-identified/ redacted. Any report of Disclosable Conduct that is made anonymously will still be protected under this Policy and the Whistleblower Laws. A Discloser can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised.
- 12.4.2. A Discloser who wishes to remain anonymous should still seek to maintain ongoing two-way communication so that they can receive updates, be asked follow-up questions or provide feedback.
- 12.4.3. Examples of mechanisms for maintaining anonymity and confidentiality of a Discloser's identity include:
- (a) using the hotline message board to conduct anonymous two-way communication with the Discloser where disclosure is made through the Whistleblowing Hotline;
 - (b) requiring ongoing confidentiality by internal or external third parties involved in investigation process;
 - (c) redacting personal information or references to the Discloser from information;
 - (d) referring to the Discloser in gender neutral context;
 - (e) where possible and relevant, contacting the Discloser to clarify any aspects of the disclosure that could inadvertently identify them;
 - (f) ensuring that disclosures are handled by appropriately qualified employees;
 - (g) where the disclosure is not anonymous, ensuring only the Eligible Recipient will be made aware of a discloser's identity unless the discloser otherwise consents; and/or
 - (h) securely storing all paper and electronic documents and other materials relating to disclosures.

12.5. Protections against detrimental treatment

- 12.5.1. Lifestyle Communities is committed to protecting and respecting the rights of a Discloser and will not tolerate any victimisation, detrimental treatment or retaliatory action against an individual who makes a disclosure in accordance with this Policy, even if the disclosure is subsequently determined to be incorrect or is not substantiated. Any such treatment will be treated as serious misconduct and may result in disciplinary action.
- 12.5.2. For illustrative purposes, a Discloser must not be disadvantaged or victimised by any of the following actions occurring:
- (a) dismissal as employee;
 - (b) harm or injury of an employee (including psychological harm);
 - (c) alteration of an employee's position or duties to his or her disadvantage;
 - (d) discrimination between an employee and other employees;
 - (e) harassment or intimidation of a person;
 - (f) damage to a person's property, reputation, business or financial position.
- 12.5.3. However, Lifestyle Communities notes that administrative action that is reasonable to protect a Discloser from detriment will not be considered as detrimental conduct, for example, when the disclosure relates to wrongdoing in the Discloser's immediate work area. In addition, protecting a Discloser from detriment does not prevent Lifestyle Communities from managing a Discloser's unsatisfactory work performance in the normal course.

12.5.4. Any Discloser who feels they have been subjected to any behaviour that violates this Policy should immediately report such behaviour to the WPO, the Head of People Experience, or their Manager. A Discloser may also seek independent legal advice or contact regulatory bodies such as ASIC, if they believe they have suffered detriment.

12.6. Compensation

12.6.1. Any Discloser who is subjected to detrimental conduct may be entitled to compensation and other remedies for loss, damage or injury suffered because of the conduct. Lifestyle Communities strongly encourages anyone seeking to do so to obtain independent legal advice.

13 Protection For Individuals Mentioned in the Disclosure

13.1. Any allegation in a disclosure made against an individual will be considered unsubstantiated until a determination has been made. Lifestyle Communities recognises that individuals against whom an allegation is made must also be supported during the investigation process. Lifestyle Communities and the WIO will take all reasonable steps to treat any person who is the subject of a claim fairly, including by:

- (a) informing that person of the substance of the allegations;
- (b) offering that person a right to submit a response to the claim; and
- (c) informing that person about the substance of any adverse conclusion at the end of the investigation process.

14 Board Oversight

14.1. The Board will monitor the whistleblower management system to ensure that broader trends, themes and/or emerging risks highlighted by disclosures made under this Policy are addressed and mitigated as part of its risk management and corporate governance.

15 Availability Of Policy

15.1. This Policy is available to officers and employees of Lifestyle Communities via the website or intranet and a hard copy is available from the Company Secretary or Head of People Experience.

15.2. Training on this Policy will be provided for all employees, including manager and the Board, at onboarding, as well as periodic continuing professional development.

16 Training and Awareness

16.1. All employees will undergo regular training on this Policy's requirements, including their rights and obligations prescribed under this Policy.

16.2. All employees will be provided a copy of the Policy as part of the employee onboarding exercise and as and when there has been a change to this Policy. All employees will need to acknowledge that they have read and understood the Policy on the training portal or other platforms as required by the Company.

16.3. The Eligible Recipient and employees who may receive a whistleblower report, will undergo regular training on how to respond to receipt of a whistleblower reports.

17 Review of the Policy

17.1. The Board will, at least every 2 years, review this Policy to ensure it reflects current regulatory, community and investor requirements. This Policy may be amended, withdrawn or replaced from time to time at Lifestyle Communities' sole discretion.

17.2. The Policy will be available on the Company's website within a reasonable time after any such updates or amendments have been approved.

Policy Authorised by: The Board	Version No: 6
Policy Maintained by: Company Secretary	Last revised and approved: 21 November 2025