



## Whistleblower Policy

### Overview

Lifestyle Communities is committed to creating and maintaining an open working environment in which employees and directors are able to raise concerns regarding unethical, unlawful or undesirable conduct.

### Purpose

This Policy sets out the process for employees and directors to report concerns of possible unethical, unlawful or undesirable conduct without fear of reprisal and with the support and protection of Lifestyle Communities.

This Policy also sets out the investigation process which Lifestyle Communities is committed to follow on receipt of a whistleblowing report, and Lifestyle Communities' commitment to rectify any wrongdoing verified by the investigation to the extent practicable in all the circumstances.

### Scope

This policy applies to all Lifestyle Communities employees and directors.

### Reporting Process

While we ask that you first raise any concerns with your manager we recognise that you may not always feel comfortable discussing certain matters with them. In such a case you should raise your concerns with anyone of the following:

██████████ (Company Secretary)

Ph: ██████████  
Email: ██████████

██████████ (Chair of the Audit Committee)

Ph: ██████████  
Email: ██████████

██████████ (Chair of the Company)

Ph: ██████████  
Email: ██████████

Employees are also reminded that they may discuss their concerns in confidence with external counselors available through the Employee Assistance Program (EAP).



## **Circumstances that you may wish to report**

As a guide, the circumstances in which it is appropriate to raise a concern are as follows:

- Conduct or practices which are suspected to be illegal or in breach of any law, regulation or code of conduct applying to Lifestyle Communities or any significant breach of a contract by an employee or director
- Suspected fraudulent or corrupt practices (such as misappropriation of funds, bribery, undue influence, false information etc.)
- Concerns about continuing or regular breaches of Lifestyle Communities' policies or other rules of conduct
- Concerns about misleading or deceptive conduct of any kind (e.g. statements that are factually incorrect)
- Situations within Lifestyle Communities' control that may present a significant risk to the health or safety of people or a significant danger to the environment
- Concerns about inappropriate staff behaviour (such as bullying, harassment, discrimination, drug abuse and other similar behaviours) that is not appropriate to discuss with your line manager

## **Confidentiality**

Reports may be submitted anonymously. Should a person choose to disclose their identity at the time of submitting their report, their identity will be kept confidential and will not be publicly disclosed by Lifestyle Communities. Section 1317AE of the Corporations Act 2001 provides that a person to whom a willful disclosure (in respect of a breach of this Act) is made (including Lifestyle Communities) must comply with specific confidentiality requirements in order to protect your anonymity.

In relation to the details of the report itself, all efforts will be made to keep the report confidential, subject to the need to conduct an adequate investigation. All documents, reports and records relating to the investigation will be stored and retained in an appropriate confidential and secure manner.

No director or employee who in good faith reports a violation of this Policy shall suffer harassment, retaliation or adverse consequence. An employee or director who retaliates against someone who has reported a violation in good faith will be subject to disciplinary action.

## **Investigation Process**

Investigation processes will vary depending on the precise nature of the conduct being investigated. In some circumstances external bodies may be involved, for example, the Police where criminal activity is alleged. All investigations must be conducted in a manner that is fair and objective to all people involved. For example, a report will not be investigated by someone who is implicated in the matter under investigation.



Lifestyle Communities has appointed firstly the Company Secretary as the Whistleblower Protection Officer (WPO). An Executive Director or the Chair of the Audit Committee could be the WPO in certain circumstances. The WPO is the designated representative for protecting the interest of whistleblowers and all reports, anonymous or otherwise, will be investigated in accordance with this Policy. The WPO will have access to independent financial, legal and operational advisers as required and may appoint an investigator, either internal or external, to assist with the investigation. The investigator will also be bound by the Whistleblower Policy, in particular the Confidentiality provisions.

### **Roles and Responsibilities**

Anyone making a report concerning any of the circumstances referred to above must be acting in good faith and have reasonable grounds for believing the information disclosed indicates such conduct. While reports can be anonymous, any allegations which prove to have been made maliciously or known to be false will be investigated and viewed as a serious disciplinary offence. No action will be taken where the report was made in good faith but no wrongdoing was identified.

Approved by the Board: 20 October 2017