WHISTLEBLOWER POLICY

1. INTRODUCTION

1.1. The Living Company (hereafter TLCo.) is committed to high standards of conduct and ethical behaviour in all of our business activities.

1.2. This Whistleblower Policy (Policy) has been adopted to promote a safe and confidential environment where people can raise genuine concerns regarding actual or suspected contraventions of our ethical and legal standards without fear of reprisal or discriminatory treatment.

1.3. The purpose of this Policy is to outline TLCo.'s whistleblowing procedures, clarify the persons to whom disclosures may be made and how they can be made, including what protections a Whistleblower will receive, and how disclosures will be responded to.

1.4. This Policy is a single, integrated policy that covers both the whistleblower protection regime under Part 9.4AAA of the Corporations Act 2001 (Cth) and the whistleblower protection regime under Part 5 of Chapter 7 of the Aged Care Act 2024 (Cth). A disclosure may qualify for protection under either or both regimes, and in each case TLCo. will apply the protection that is most favourable to the Whistleblower.

2. SCOPE OF POLICY

2.1. This Policy applies to TLCo.'s current and former directors, officers, employees (including casual and temporary workers), contractors, consultants, volunteers, suppliers, associates and relatives, spouses and dependants of the aforementioned individuals.

2.2. This also includes individuals who receive funded aged care services through Aveo Home Care Services as the registered provider.

2.3. Anyone with information about Potential Misconduct is encouraged to speak up.

3. DEFINITIONS AND TERMS

The following terms are used throughout this Policy:

3.1. Potential Misconduct

Refers to any suspected or actual misconduct; or improper state of affairs or circumstances in relation to TLCo. or its people.

This may include behaviour that you believe contravenes TLCo.'s company policies or the law.

Potential Misconduct under this Policy includes, but is not limited to:

- conduct or practices which are illegal or breach any law;
- dishonest, unethical or corrupt behaviour;
- payment or receipt of a bribe/inducement;
- theft, fraud or misappropriation;
- unsafe work practices, environmental or health risks;
- information that represents a danger to the public or to the financial system;
- any suspected breach of aged care legislation or allegations of misconduct associated with the delivery of commonwealth funded aged care;
- abuse of authority;
- conflicts of interest;
- anti-competitive behaviour;

- breach of trade sanctions;
- modern slavery practices;
- tax-related misconduct;
- unauthorised use of TLCo.'s confidential information;
- conduct likely to damage TLCo.'s financial position or reputation;
- breach of TLCo.'s policies and/or *Code of Conduct;* or
- deliberate concealment of any of the above.

Potential Misconduct does not generally include Personal Work-Related Grievances.

3.2. Personal Work-Related Grievances

Grievances relating to your current or former employment or engagement that have implications for you personally (such as a disagreement between you and another employee or a decision about your promotion or reward).

Generally, these grievances should be raised via ordinary People & Culture and performance management channels.

In some cases, these grievances may qualify for legal protection (see Attachment 1)

3.3. Recipients

Recipient means any person, role or designated reporting channel authorised to receive a whistleblower report under this Policy. Refer to Section 4 for further details.

4. HOW TO MAKE A REPORT AND WHO TO SPEAK TO (RECIPIENT)

4.1. Potential Misconduct can be reported to the following Recipients:

- Ben Valencia-Klug, Chief Operating Officer & General Counsel; or
- Joshua Little, Chief Risk and Compliance Officer (CRCO).

Under law there are certain other people, who are known as "eligible recipients", to whom you can make a report and still receive legal protections under this Policy. In addition to the internal Recipients listed above, external eligible recipients include statutory authorities such as ASIC, AHPRA, ACQSC, a legal practitioner (for the purpose of obtaining legal advice or representation), and the Company's auditor (or a member of an audit team conducting an audit) or actuary.

See Attachment 1 for more details on eligible recipients, protected disclosures and public interest and emergency disclosures.

4.2. Report to a Recipient may be made orally or in writing using the following channels:

(1) Phone: 1300 068 888 (ask to speak to one of the named recipients).

(2) Email: Whistleblower@thelivingcompany.com.au

(3) Postal Address:
Level 14, 275 George Street, Sydney NSW 2000.

Reports may also be made anonymously.

4.3. TLCo. is committed to safeguarding the interests of the Whistleblower in accordance with this Policy and any applicable legislation. TLCo. is also committed to keeping the Whistleblower informed of the progress of the report where practicable.

5. INFORMATION YOU SHOULD PROVIDE

5.1. You should provide as much information as possible, including details of the Potential Misconduct, people involved, dates, locations and if any more evidence may exist. The type of information that may be helpful includes:

- your name and contact details (unless you choose to remain anonymous);
- the date and time of the Potential Misconduct;
- the date and time the Potential Misconduct was detected/observed;

- how the Potential Misconduct came to your attention;
- the nature of the Potential Misconduct;
- those involved in the Potential Misconduct;
- the names of all parties privy to/aware of the Potential Misconduct;
- the value of the loss (if any) to TLCo. as a result of the Potential Misconduct; and
- details of any evidence to support/ substantiate the Potential Misconduct.

You can still provide a report even if you do not have all of this information.

5.2. You can make an anonymous report if you do not want to reveal your identity. However, we encourage you to provide your name because it will make it easier to investigate and address your report.

5.3. If you do not provide your name, any investigation will be conducted as far as is practicable given the circumstances. It is also possible that an investigation may not be feasible where insufficient information is provided. Moreover, it may be difficult to offer you the same level of practical support if we do not know your identity.

5.4. If you do provide your name, it will only be disclosed where you provide your consent, or in exceptional circumstances, where the disclosure is allowed or required by law (e.g. in dealings with a regulator). If you have concerns about this, you can discuss this with a Recipient.

6. TLCo.'S RESPONSE TO REPORTS

6.1. All reports of Potential Misconduct are taken seriously and will be dealt with in a confidential, prompt and discreet manner. TLCo.'s response to a report will vary depending on the nature of the report (including the amount of information provided). Your report may be addressed and resolved informally or through formal investigation.

6.2. Whistleblowing does not guarantee that the report will be formally investigated, but all reports will be properly assessed and considered by TLCo. as to whether they should be investigated.

6.3. If an investigation is conducted, the investigations process will adhere to the principles of independence, objectivity, confidentiality and natural justice. The investigation will be independent from any persons to whom the disclosure relates. When appropriate, a person being investigated will be provided with details of the disclosure that involves them and be given an opportunity to respond.

6.4. Investigations will generally be overseen by the Chief Risk and Compliance Officer or the Chief Operating Officer & General Counsel, subject to any potential conflicts of interest or other concerns. Other people, including employees or external advisers, may also be asked to assist or run the investigation.

6.5. You must cooperate fully with any investigations.

6.6. If appropriate, Whistleblowers will be told how TLCo. has decided to respond to their disclosure, including whether an investigation will be conducted. This may not occur until after an investigation has been concluded. It may not be possible to update you unless contact details are provided when making a report.

6.7. Where an investigation substantiates a breach of TLCo.'s *Code of Conduct* or internal policies or procedures, appropriate disciplinary action will be taken. This may include but is not limited to terminating or suspending the employment or engagement of the person(s) involved in the misconduct.

6.8. Unless there are confidentiality or other reasons not to do so, persons to whom a disclosure relates will be provided with details of the report that involves them at an appropriate time (to the extent permitted by law) and be given an opportunity to respond. TLCo. will also take reasonable steps to ensure the fair treatment and welfare of any person named in, or the subject of, a disclosure, including by treating the allegation as unsubstantiated unless and until it is substantiated through investigation, maintaining confidentiality as far as possible, applying the rules of natural justice, and offering appropriate support (including access to the Employee Assistance Programme) to that person.

6.9. The results of any investigation will be recorded in writing in a form of TLCo.'s choosing, which will be confidential and is the property of TLCo. Any report or other document produced will not be provided to you or any other person subject to or implicated in an investigation. The outcome of any investigation will also be reported to a Board sub-committee in accordance with Section 11 of this Policy.

7. CONFIDENTIALITY AND PROTECTING YOUR IDENTITY

7.1. Information coming into the possession of a person from a Whistleblower, the identity of the Whistleblower or information which may lead to their identity will not be disclosed to anyone, unless you give your consent to disclose that information or in exceptional circumstances where the disclosure is allowed or required by law or in the case of information likely to identify you, it is reasonably necessary to disclose the information for the purposes of an investigation, but all reasonable steps are taken to prevent someone from working out your identity.

7.2. No details of reports made under this Policy will be included in an employee's personnel file or performance review.

8. PROTECTION FROM DETRIMENTAL CONDUCT

8.1. No person may cause detriment to someone else (or threaten to do so) because of a belief that person has or will make a report under this Policy. Examples of detriment include discrimination, harassment, causing physical or psychological harm, damaging property, demotion, dismissal and varying an employee's role or duties.

8.2. Employees must not be discriminated against or disadvantaged in their employment with TLCo. as a result of making a report in accordance with this Policy. You should tell a Recipient if you or someone else is being, or has been, subject to detrimental conduct (or if you are concerned that you may be victimised).

8.3. Any person involved in detrimental conduct will be subject to disciplinary action, including but not limited to termination of employment or engagement. In some circumstances, this may also be a criminal offence punishable by imprisonment. TLCo. may refer any person that has engaged in victimising conduct to law enforcement authorities for further investigation.

8.4. TLCo. will take all reasonable steps to ensure that adequate and appropriate protection is provided for those who make a report. This protection applies if the matter is proven or not. The protections offered will depend on things such as the Potential Misconduct and people involved. Protections may include the following:

- monitoring and managing the behaviour of other employees;
- relocating employees (which may include the people alleged to have been involved in the Potential Misconduct) to a different business unit, department or office;
- offering you a leave of absence or flexible workplace arrangements while a matter is investigated;
- an employee making a report may access TLCo.'s Employee Assistance Program and the support services provided therein; and/or
- rectifying any detriment that you have suffered.

8.5. In addition, TLCo. may appoint a Whistleblower Protection Officer to support and help protect you. If appointed, the Whistleblower Protection Officer will be your point of contact. They can arrange additional support for you where needed and can escalate any concerns you have with how your report is being dealt with. TLCo. can only appoint a Whistleblower Protection Officer where you have agreed to share your identity with the Whistleblower Protection Officer.

8.6. TLCo. will look for ways to support all people who speak up and make a report under this Policy, but it will of course not be able to provide non-employees with the same type and level of support that it provides to employees. In all cases, TLCo. will seek to offer as much support as practicable.

8.7. Further information regarding the protections afforded under Australian law to persons who make a report under this Policy is available at Attachment 1.

8.8. Disclosures that do not relate to Potential Misconduct may not qualify for protections under the Corporations Act.

9. MAKING KNOWINGLY FALSE OR MISLEADING REPORTS

9.1. When making a report of Potential Misconduct, you will be expected to have reasonable grounds to believe the information you are disclosing is true. You will not be penalised where the information turns out to be incorrect and the report was made on reasonable grounds.

9.2. However, where employees are found to have knowingly made a report that is deliberately untrue or misleading, the making of the report will be regarded as misconduct and will be subject to disciplinary action, which may include dismissal.

10. FURTHER INFORMATION

10.1. TLCo. will provide training on this Policy and the whistleblower protection regimes under the Corporations Act and the Aged Care Act 2024 to all relevant workers and responsible persons on induction and periodically thereafter.

10.2. Any questions about this Policy or Whistleblowing can be referred to the Chief Risk and Compliance Officer or the Chief Operating Officer & General Counsel.

10.3. This Policy will be available on TLCo.'s public website and on the Company's intranet.

10.4. A copy of this policy can be requested, without charge, by any individual to whom TLCo. provides aged care services, their supporters, family members, representatives or advocates, and any other person who requests it.

10.5. TLCo. will, where reasonably required, provide this Policy in an alternative accessible format or in a language other than English.

10.6. This Policy does not form part of terms of employment and may be amended from time to time. TLCo.'s whistleblower system (including this Policy) will be reviewed at least annually by the Chief Risk and Compliance Officer, with oversight from the Risk Committee, to confirm that it remains effective and compliant with the Corporations Act, the Aged Care Act 2024 and the Aged Care Rules, and to implement any improvements identified.

11. REPORTING

11.1 The TLCo. Risk Committee, as a sub-committee of the Board, will receive a summary of disclosures made under this Policy on at least a semi-annual basis. The Risk Committee will be provided with additional information on any material incidents reported under this Policy as and when appropriate.

This policy was reviewed and updates approved by the Risk Committee on 14 May 2026.

ATTACHMENT 1: PROTECTIONS PROVIDED BY LAW

Additional legislative protections

You are encouraged to speak up and make a report under this Policy.

However, the law offers protections in other cases – for example, you can report potential misconduct to people other than Recipients. If you make a "protected disclosure" under the law that does not comply with TLCo.'s Whistleblower Policy, you will still be entitled to legal protections. A protected disclosure can qualify for protection under the *Corporations Act 2001* (Cth) (Act) or Aged Care Act 2024 even if it is made anonymously or turns out to be incorrect.

Please contact a Recipient if you would like more information about legal protections.

Protected disclosures

To be a protected disclosure qualifying for protection under the Act, the disclosure must relate to a disclosable matter and be made to an eligible recipient under the Act. A matter that is disclosed under the Policy but which does not meet these criteria will not qualify for protection under the Act. Examples of this information and eligible recipients are outlined in the following table.

Information reported or disclosed	Eligible recipient(s) of disclosed information
General disclosable matters Information about actual or suspected misconduct, or an improper state of affairs or circumstances in relation to the Company or a related body corporate. This includes information that the Company, or a related body corporate or any officer or employee of the Company has engaged in conduct that: • contravenes or constitutes an offence against certain legislation; • represents a danger to the public or the financial system; or • constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. Note that "personal work-related grievances" are not protected disclosures under the law, except as noted below.	• A person authorised by the Company to receive protected disclosures – i.e. Recipients under this Policy. • An officer or senior manager of the Company or a related body corporate. • An auditor, or a member of an audit team conducting an audit, of the Company or a related body corporate. • An actuary of the Company or a related body corporate. • ASIC or APRA. • A legal practitioner for the purpose of obtaining legal advice or legal representation (even in the event that the legal practitioner concludes that a disclosure does not relate to a 'disclosable matter'). • Any prescribed Commonwealth authority or other relevant regulator or agency.
Tax-related disclosable matters Information that may assist the Commissioner of Taxation to perform his or her functions or duties under a taxation law in relation to the Company.	• Commissioner of Taxation. • A legal practitioner for the purpose of obtaining legal advice or legal representation.

Information reported or disclosed	Eligible recipient(s) of disclosed information
Further tax-related information Information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of the Company or an associate, which the employee considers may assist the recipient to perform functions or duties in relation to the tax affairs of the Company or an associate.	• A person authorised by the company to receive reports of tax-related disclosable matters. • An auditor, or a member of an audit team conducting an audit, of the Company or an associate. • A registered tax agent or BAS agent who provides tax services or BAS services to the Company. • A director, secretary or senior manager of the Company. • An employee or officer of the Company who has functions or duties that relate to the tax affairs of the Company. • A legal practitioner for the purpose of obtaining legal advice or legal representation
Aged care qualifying disclosures Information about actual or suspected misconduct, non-compliance with the Aged Care Act 2024 or Aged Care Rules, or an improper state of affairs or circumstances in connection with the delivery of Commonwealth-funded aged care services by TLCo. or its aged care workers or responsible persons.	• For disclosures qualifying for protection under the Aged Care Act 2024, a disclosure may also be made (orally or in writing, and anonymously if the discloser chooses) to any aged care worker of TLCo., to a responsible person of TLCo., or to TLCo. itself, as well as to the external eligible recipients referred to above (which, for aged care qualifying disclosures, also include the Aged Care Quality and Safety Commissioner, the Complaints Commissioner, the System Governor, an official of the Department of Health, Disability and Ageing, an independent aged care advocate, and a police officer). Aged care workers who receive such a disclosure must protect the confidentiality of the discloser and escalate the matter in accordance with this Policy. https://www.health.gov.au/contacts/secretary-of-the-department-of-health-disability-and-ageing https://www.agedcarequality.gov.au/ • A discloser making an aged care qualifying disclosure may elect to have their disclosure managed under TLCo.'s complaints and feedback regime rather than the whistleblower stream. Where an election is not made, TLCo. will triage the disclosure in consultation with the discloser (where possible) to determine the appropriate pathway, having regard to the discloser's preference for anonymity, the nature of the concern, and the availability of statutory protections. The rationale for the chosen pathway will be documented.

Emergency and public interest matters

The law also protects certain disclosures made in "emergency" and "public interest" situations, in which case disclosures can be made to additional recipients (such as journalists or parliamentarians). It is important for you to understand the criteria for making a public interest or emergency disclosure before doing so.

Please contact TLCo.'s Chief Operating Officer & General Counsel or Chief Risk and Compliance Officer if you would like more information about emergency and public interest disclosures.

Personal work-related grievances

Legal protection for disclosures about solely personal employment related matters are only available under the law in limited circumstances. A disclosure of a personal work-related grievance will remain protected if, in summary:

- it concerns detriment to you because you have or may be considering speaking up and making a report as a Whistleblower; or
- it is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the law about Whistleblowers.

Under the law, a grievance is **not** a 'personal work-related grievance' if it:

- has significant implications for an entity regulated under the law that do not relate to the discloser;
- concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or that constitutes an offence punishable by 12 months or more imprisonment under any other Commonwealth laws;
- concerns conduct or alleged conduct that represents a danger to the public or financial system; or
- concerns conduct or alleged conduct prescribed by the regulations.

Specific protections and remedies

Additional legislative protections may also be available, including but not limited to:

- compensation for loss, damage or injury suffered as a result of detrimental conduct;
- an injunction to prevent, stop or remedy the effects of the detrimental conduct;
- an order requiring an apology for engaging in the detrimental conduct;
- if the detrimental conduct wholly or partly resulted in the termination of an employee's employment, reinstatement of their position;
- exemplary damages; and/or
- any other order the Court thinks appropriate.

The law also states that if you make a protected disclosure:

- in some circumstances (e.g. if the disclosure has been made to a regulator) the information you provide is not admissible in evidence against you in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information;
- you are not subject to any civil, criminal or administrative liability for making the disclosure; and
- no contractual or other remedy may be enforced or exercised against on you the basis of the disclosure.

However, you will not have immunity for any misconduct you have engaged in that is revealed in a disclosure.