



Fraud, Corruption and Bribery (Prevention and Awareness) Policy

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1 Objective

Lifestyle Communities Limited (“Lifestyle Communities” or the “Company”) is committed to achieving the highest corporate standards and does not tolerate unethical or unprofessional behaviour including fraud, bribery and corruption. Lifestyle Communities acknowledges that the model of ethical and professional behaviour expected from its operations must be reflected in the most senior levels of management.

This policy provides guidance to all employees and stakeholders on the expectations, principles and processes that must be adhered to in relation to ethical behaviour, preventing fraud, bribery and corruption, facilitation payments, gifts and entertainment and political engagement within Lifestyle Communities and its operations.

It should be read in conjunction with the following related policies:

- Risk Management Framework
- Employee Code of Conduct
- Whistleblower Policy
- Securities Trading Policy
- Communications and Continuous Disclosure Policy

This policy applies to all directors, officers, employees (including temporary employees), contractors and consultants (collectively “Employees”) of Lifestyle Communities and its subsidiaries (“Group”).

2 Policy Position – Fraud Bribery and Corruption

- We want our relationships with partners and stakeholders to be positive and to reflect our core values.
- We are committed to complying with laws and regulations addressing fraud, bribery and corruption wherever we conduct business.
- Individuals must not knowingly commit, be party to, or be otherwise involved in fraud, bribery and corruption. Any Employee who has been found to have personally committed or aided and abetted the commission of fraud against any member of the Group will be summarily dismissed.
- Fraud, bribery and corruption are serious criminal offences and are not tolerated.. Conduct involving fraud, bribery and corruption may attract serious criminal and civil penalties to the Group and its Employees and can have a significant impact on our reputation and financial future.
- We will not do business with any organisation that engages in fraudulent or corrupt activity.

2.1 What is Fraud?

Fraud is defined as a dishonest activity that causes actual (or potential) financial loss to any person or entity. It is the theft or improper use of the Group's resources and can be committed by Employees or people external to the Group.

Fraud generally involves the use of misrepresentations, dishonest or deceitful conduct in order to obtain some unjust or unlawful advantage over another or to cause disadvantage to the Group. The deliberate falsification, manipulation, concealment or destruction of reports, records and documents is also regarded as fraudulent activity.

2.2 What is Corruption?

Corruption occurs where an Employee abuses their position of trust for personal gain or advantage (or gain or advantage for another). Corrupt behaviour would also include conduct to secure some form of improper advantage for the Group either directly or indirectly.

2.3 What is Bribery?

Bribery is defined as dishonestly giving a benefit to another person, or causing a benefit to be given, with the intent of influencing that person (or a third person) in the exercise of their professional duties. A bribe includes the payment of a secret commission or accepting a secret commission.

Employees may not give or offer, solicit or receive bribes. Without limitation to the foregoing, Employees must not give or offer bribes or other improper payments or benefits to any representative of any government or regulatory body (whether in Australia or elsewhere).

Examples of activity that constitute fraud, bribery and corruption are set out in Schedule 1 of this policy.

3 Detection

Risk reviews and fraud detection form part of our Risk Management Framework, which is facilitated by the Leadership Team. This includes developing a risk-aware culture and embedding risk management practices into day to day operations. These assessments assist in the identification of fraud risk within the various business areas and the review of the effectiveness of controls implemented to mitigate that risk.

Real or potential fraud, corrupt behaviour or bribery may be identified from the following sources:

- Routine monitoring activities and exception reporting.
- Internal and external audits and reviews or independent expert reviews and investigations.
- Notification from employees, homeowners, investors or service providers.
- Good faith reporting (under our Whistleblower Policy).

4 Prevention

All Employees play a critical role in preventing fraud within the business. They can do this by:

- Knowing what fraud, corruption and bribery are.
- Understanding the responsibilities of their position.
- Familiarising themselves with correct procedures and controls in their areas of activity designed to minimise the risk of fraud, corruption and bribery, and adhering to them.

- Being continuously vigilant to the potential for fraud, corruption and bribery.
- Alerting responsible people to possible or perceived vulnerabilities.

Lifestyle Communities will ensure that managers and Employees likely to be exposed to bribery and corruption are provided training on how to recognise and deal with these issues.

5 Formal Controls

The primary methods of control implemented by Lifestyle Communities to prevent fraud, corruption and bribery are:

- A firm focus on building an ethical, honest and committed workplace culture.
- Detailed and regular review and monitoring of fraud, corruption and bribery risks within business operations.
- Ongoing review, evaluation, verification and monitoring of the enterprise risk management framework and exiting policies and procedures addressing fraud, corruption and bribery risk.
- Development and maintenance of business processes and the internal controls framework.
- Reference and background checks for the appointment of employees, contractors and service providers, and exit interviews by non-direct reports.
- Education and training programs for employees in awareness and identification of fraud, corruption and bribery.
- Internal review and external audit functions which assess and report on the design and operating effectiveness of business processes and internal controls.

The adequacy and appropriateness of the above methods of control are reviewed on an ongoing basis.

6 Reporting and Investigation

Lifestyle Communities is committed to and strongly supports disclosure by Employees of bribery, fraudulent or corrupt conduct, illegality or improper use of the Group's assets.

Possible or actual bribery, corruption or fraudulent activity should be immediately reported to the Company Secretary, Chief Financial Officer and/or Managing Director, or under the Whistleblower Policy.

To the extent available, the following information should be included in any report:

- Date the incident was identified.
- Date the incident occurred.
- Brief description of the incident including how it was identified and how it occurred.
- Details of the impact to homeowners or the Group.
- Dollar impact (if known).

Employees should feel confident when raising concerns relating to potential fraudulent, corrupt or improper conduct. To protect Employees who make disclosures from detrimental action or reprisal, Lifestyle Communities has established a Whistleblower Policy. Having said that, Lifestyle

Communities also takes deliberate or malicious false disclosures of improper conduct very seriously and any Employee found to have made a false or vexatious disclosure will be subject to disciplinary action.

On report, Company Secretary (or an alternative independent member of the Leadership Team) will conduct further inquiries in order to determine the cause, nature and circumstances surrounding the incident or activity. The investigating officer will advise the Managing Director of the issue and, on consideration, will advise the board of directors of the Company (“Board”).

7 Gifts & Benefits

The receipt and giving of gifts, benefits or entertainment is permitted, however should not be so lavish or excessive as to operate (or imply to operate) as a bribe, an inducement to do business or imply an attempt to influence a business decision.

The following gifts must not be given or accepted:

- any gift which implies or demonstrates a conflict or appearance of conflict between the self-interest of any Employee and their responsibility to the Group and its clients;
- any amount of cash; or
- gifts, benefits or entertainment offered during a decision-making process such as a major procurement or tender.

If an Employee is offered a gift falling within any of the prohibited categories above, or a permitted gift over \$200 in value, that Employee must report the offer to the Company Secretary as soon as practicable after it is made. The Company Secretary will maintain a Register of Gifts.

Gifts of a nominal value (i.e. below \$200) and not falling within one of the prohibited categories may be retained by the Employee. Gifts over \$200 given to employees by suppliers, service providers and other business associates may be required to be returned or surrendered to Lifestyle Communities. Lifestyle Communities will use surrendered items for charitable fund-raising activities and where possible, donate any perishable short shelf life items to a local charity.

8 Lobbying

Lifestyle Communities takes pride in its ethical and socially responsible conduct. We have an obligation, on behalf of our investors and the broader community, to make a positive and constructive contribution to policy development relating to the land lease industry and to participate in the policy decision-making process. We also have an obligation to develop and manage our assets in the interests of our investors and broader community.

8.1 Political Donations

Lifestyle Communities will not make political donations or provide gifts to politicians, public servants or other representatives of any government or regulatory bodies (in Australia or elsewhere).

8.2 Meetings with Law Makers

As part of the Group’s property management and development activities, Employees may need to meet with representatives of local, state or federal government to discuss issues such as zonings, planning approvals and infrastructure. Lifestyle Communities will comply with all relevant legislation in these engagements.

In accordance with the Victorian Lobbyists Code of Conduct, where an Employee meets with a government official to discuss zonings, planning approvals and infrastructure, the Employee will:

- disclose to the official before the meeting the nature of the matter to be discussed;
- disclose to the official before the meeting commences any financial or other interest the Group has in the matter to be discussed;
- not engage in misleading, dishonest, corrupt or other unlawful conduct in connection with the meeting;
- use all reasonable endeavours to satisfy themselves of the truth and accuracy of all material information provided in connection with the meeting.

At all times, the interests of investors and the broader community are to be taken into consideration.

In situations where Lifestyle Communities believes it is beneficial to appoint a professional lobbyist to act on its behalf, approval must be granted by the Managing Director. The appointed lobbyist must be appropriately registered and confirm he/she will comply with the Victorian Lobbyists Code of Conduct.

8.3 Industry Lobbying

To support and encourage effective policy development for the land lease industry, Lifestyle Communities works closely with the Property Council of Australia (“PCA”) and the Residential Land Lease Alliance (“RLLA”) developing recommendations and drafting submissions to government and statutory authorities. Lifestyle Communities may be requested to participate in working groups facilitated by the PCA and the RLLA.

In these situations, Lifestyle Communities representatives will act for the benefit of the land lease industry as a whole.

9 Review of this Policy

The Board will, at least once every 2 years, review this Policy to determine its adequacy for current circumstances.

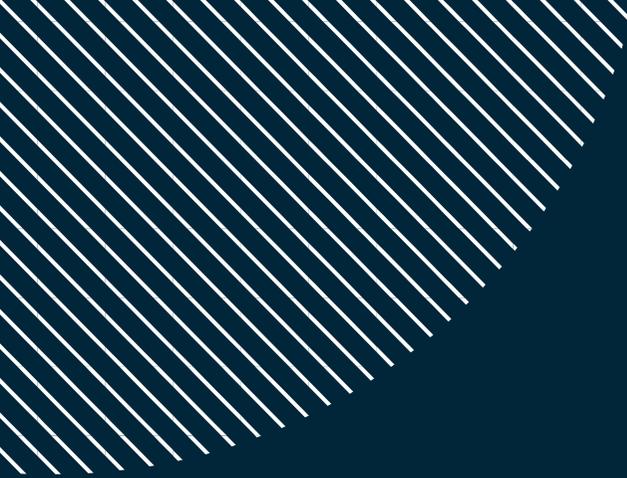
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Policy Maintained by: Company Secretary	Last revised and approved: 12 August 2020

SCHEDULE 1 - Examples of Fraudulent Acts

The following are examples of fraudulent or unlawful acts and unethical or corrupt behaviour. It is not an exhaustive list.

Abuse of Official Position for Private Gain	This includes the acceptance of lavish gifts, bribes, corruption, blackmail, improper use of confidential information, and bias to suppliers or contractors
Accepting or Offering Bribes	Bribery is defined as dishonestly giving a benefit to another person, or causing a benefit to be given, with the intent of influencing that person (or a third person) in the exercise of their professional duties, including to a representative of a government or regulatory body (within Australia or elsewhere)
Facilitation Payments	Facilitation payments are a form of bribery and made with the purpose of expediting or facilitating the performance by a public official for a routine action. The United Nations Convention against Corruption prohibits facilitation payments.
Collusion to Commit Fraud	Collusion can occur when an Employee acts with another Employee to defraud the Group or a client of the Group. Collusion could also occur between an Employee and people outside the Group. This could involve Employees providing information or other assistance to third parties to help them commit fraud upon the Group or a client of the Group.
Commercially Sensitive Information	Commercially sensitive and other confidential information must not be released without proper authorisation. Release of information may be unlawful and could breach the provisions of the <i>Privacy Act 1988</i> (Cth), <i>Corporations Act 2001</i> (Cth) and/or ASX Listing Rules.
Conflicts of Interest	Employees have an obligation to act for the benefit of the Group. Accepting commissions, fees, gifts or favours that might act as an inducement to do business or influence a business decision could result in a conflict of interest.
Forgery or Falsifying Records	The falsifying of records and processing of a false statement is fraud (e.g. falsifying data on receipts or invoices, forgery of a signature on a cheque or document, or forgery of certificates of competency or qualifications).
Misleading or Deceptive Conduct	Any act, behaviour or statement made with the intention of misleading another party to enter into a contractual or business arrangement or procure/purchase a product or service which is inappropriate or unsuitable for their circumstances and may result in monetary loss or inadequate benefits for price/cost incurred.
Inappropriate use of Property and Assets	Inappropriate use of the Group's property and facilities (including car spaces at Lifestyle Communities owned and managed properties), motor vehicles, computers, smart phones, photocopiers, email or Internet.
Inside Trading / Information	Buying or selling Lifestyle Communities securities on non-public (inside) price sensitive information not generally available to investors breaches the <i>Corporations Act 2001</i> (Cth). The law prohibits the use of inside information (insider trading) and the disclosure of inside information (tipping).

Theft	Besides cash and cheques, the most common types of property stolen include consumables or supplies, computers (especially laptops), smartphones, software, electronic office equipment, digital cameras, gift cards, “scratch & win” cards and intellectual property. Theft also includes building materials and supplies, the unauthorised use of credit cards and theft of documents and data.
Provision of False Information	This includes the provision of financial information, briefs, papers etc, to management, the Board and its committees, regulatory authorities and to the public which is intentionally false.



Lifestyle

COMMUNITIES

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