

Statement of Whistleblower Protection Policy.

Whistleblowing can be an effective way of uncovering fraud and other misconduct which may not be identified by internal or external controls within an organisation. Livable Limited is committed to the principles of transparency and accountability and views whistleblowing as an opportunity to reflect upon organisational procedures and promote an ethical culture.

Where a director, employee, contractor, or associate of the organisation believes, on reasonable grounds, that another person or persons associated with the organisation has been involved in illegal, improper or unethical conduct, they are encouraged and supported to report the conduct without reprisal or consequence.

Livable will treat all disclosures made under its whistleblower policy in the same way, regardless of whether the matter qualifies for protection under Australia's whistleblower laws.

Definitions

Confidentiality: is when one's identity is protected to prevent harm. In the case of a whistleblower, their identity may be known to those receiving and investigating the report, but is protected from the broader organisation and public.

Detrimental conduct: Conduct, or a threat to engage in conduct, that causes detriment to a discloser.

Disclosable matter: Information to which the whistleblower protections apply.

Discloser: An individual who discloses wrongdoing or an eligible whistleblower.

Disclosure: A disclosure of information relating to wrongdoing or a disclosable matter.

Disclosures qualifying for protection: Disclosures pertaining to tax matters are referred to as 'disclosures qualifying for protection'.

Eligible recipient: An individual who can receive a disclosure.

Eligible whistleblower: An individual to whom the whistleblower protections apply.

Personal information: Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether:

- true or not; and
- recorded in a material form or not.

Personal work-related grievance: A disclosure that relates to the discloser's current or former

employment, which has implications for the discloser personally, but does not:

- have any other significant implications for the organisation (or another organisation); or
- relate to conduct, or alleged conduct, about a disclosable matter.

Public interest disclosure: The disclosure of information to a journalist or a parliamentarian, where the discloser has reasonable grounds to believe that making a further disclosure of the information is in the public interest. The disclosure must meet a number of other criteria to qualify.

Whistleblower: A discloser who has made a disclosure that qualifies for protection under the *Corporations Act 2001*.

Whistleblower protection officers (WPO): The role under an organisation's whistleblower policy that is responsible for protecting or safeguarding disclosers and ensuring the integrity of the reporting mechanism.

Purpose

Livable's whistleblower policy is an important tool for helping our organisation to identify any wrongdoing that may not be discovered unless there is a safe and secure means for disclosing wrongdoing.

Our policy is drafted with the intention of addressing the following aims:

- to encourage more disclosures of wrongdoing;
- to help deter wrongdoing, in line with our organisation's risk management and governance framework;
- to ensure individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported;
- to ensure disclosures are dealt with appropriately and on a timely basis;
- to provide transparency around our organisation's framework for receiving, handling and investigating disclosures;
- to support our organisation's values and code of conduct policy;
- to support our organisation's long-term sustainability and reputation;
- to meet our organisation's legal and regulatory obligations; and
- to align with the ASX Corporate Governance Principles and Recommendations

Whistleblower protection officers (WPO)

The CEO and business quality manager are the organisation's WPO's. Responsibilities include:

- Implementing Livable’s whistleblower protection policy;
- Initial response to an accusation of wrongdoing;
- Ensuring the protection and/or anonymity of the discloser, where possible;
- Conducting or assisting in investigations into alleged wrongdoings;
- Informing the discloser of the progress and outcomes of investigations;
- Ensuring that disclosers do not suffer any retaliation or negative consequences;
- Providing support and referrals for both disclosers and those accused of wrongdoing.

Livable will ensure that all people associated with the organisation know who the designated WPO is and their contact details.

Who is an “eligible whistleblower”

Under this policy, an eligible whistleblower is:

An individual who is, or has been, any of the following in relation to the organisation:

- a) an officer or employee (e.g., current and former employees who are permanent, part-time, fixed term or temporary, interns, secondees, managers, and directors);
- b) a supplier of services or goods to the organisation (whether paid or unpaid), including their employees (e.g., current and former contractors, consultants, service providers and business partners);
- c) an associate of the organisation; and
- d) a relative, dependant or spouse of an individual listed in (a) to (c) (e.g., relatives, dependants or spouse of current and former employees, contractors, consultants, service providers, suppliers and business partners).

A discloser will qualify for protection as a whistleblower under the *Corporations Act 2001* if they are an eligible whistleblower in relation to Livable, *and*:

- a) they have made a disclosure of information relating to a ‘disclosable matter’ directly to an ‘eligible recipient’ or to ASIC, APRA or another Commonwealth body prescribed by regulation;
- b) they have made a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the *Corporations Act 2001*; or
- c) they have made an ‘emergency disclosure’ or ‘public interest disclosure’.

