

WHISTLEBLOWER POLICY

PURPOSE

Ryman Healthcare Limited, and all of its subsidiaries, (**Ryman**) are committed to high standards of ethical, moral and legal business conduct at all times.

In line with this commitment, we encourage open communication with anyone at Ryman who wishes to raise concerns and report serious wrongdoings within the workplace.

The purpose of this Policy is to ensure that everyone at Ryman feels confident and supported to raise concerns about actual or suspected serious wrongdoings at Ryman without fear of reprisals.

The Policy sets out what a wrongdoing is, who those wrongdoings can be reported to, and how Ryman will deal with wrongdoings reported.

Anyone who encounters wrongdoing is encouraged to report it using the procedures in this Policy. This reporting can be done anonymously as explained below.

This Policy applies to all employees (current and past) of Ryman, directors, secondees, or anyone engaged under a contract to provide services to Ryman including volunteers. This Policy may also apply to a spouse, relative or dependent of one of the class of people listed.

WHAT IS SERIOUS WRONGDOING

If you have evidence of, or suspect, serious wrongdoing, please inform a member of Ryman's senior management team as soon as possible.

Examples of serious wrongdoing that are reportable under this Policy include any actual or suspected:

- conduct posing a serious health, safety, or environmental risk;

- dishonest or illegal practices including theft or fraud;
- any criminal offence;
- sexual harassment, bullying or discrimination of any kind; or
- any breach of Ryman's Code of Ethics.

PROCESS FOR RAISING A CONCERN

It is important to follow Ryman procedures in reporting any concerns you have. Employment related concerns should continue to be reported through the normal channels including to the employee's immediate manager, Village Manager, or Project Manager.

You may choose to report any serious wrongdoing under this Policy to one of the following: the Chief People and Safety Officer, Group General Counsel and Company Secretary, New Zealand Chief Executive Officer, Australian Chief Executive Officer or Group Chief Executive Officer (**Disclosure Officers**). If you believe one of the Disclosure Officers is involved in serious wrongdoing you may raise your concerns directly with the chair of the Audit, Finance and Risk Committee or the chair of the Board.

Alternatively, if you feel more comfortable you can report, and may do so anonymously, to our external whistleblower service operated 24/7 by PwC. This may be done by:

- Calling the hotline available 24 hours a day
 - In Australia 1800 950 477
 - In NZ 0800 177 792 [0800 177 PWC]
- Via the online portal: <https://www.pwc.co.nz/services/forensic-services/ryman-whistleblower-form.html>
- Via email ryman.speakup@pwc.com or nz.ryman.speakup@pwc.com

Anyone making a report must include enough information about the situation to allow a thorough and fair investigation to take place. All reports should be done in good faith, be truthful, and be able to be substantiated.

All reports made internally or to our independent external whistleblowing service will be investigated and the initial assessment outcome reported back to the whistleblower within 20 working days of the initial report.

If no action is taken within 20 working days of a report of serious wrongdoing you may raise your concern directly with the chair of the Audit, Finance, and Risk Committee or the chair of the Board.

Anyone accused of serious wrongdoing will have the right to answer the allegation.

Reports in Australia may also be made to the Australian Securities and Investment Commission, Australian Prudential Regulation Authority or a Commonwealth authority relevant to the company. The protections offered under this policy can also apply to you if you make a report to a journalist or a member of the Commonwealth Parliament or a Victorian parliamentarian where it is a matter of public interest or an emergency.

PROTECTIONS FOR WHISTLEBLOWERS

You are encouraged to put your name to allegations to enable appropriate follow-up questions and a full investigation.

Ryman will ensure all reasonable steps are taken to ensure the whistleblowers' identity is kept confidential. In some situations, this may not be possible, including where:

- identification of the whistleblower is essential to prevent serious risk to public health and/or safety, the environment or Ryman's reputation; or
- a court order requires identification.

Any information disclosed as part of the reporting process will be treated confidentially and will only be shared to the extent required to conduct a thorough and fair investigation.

No-one reporting a serious wrongdoing will face disciplinary action or retaliation as a result of the reporting as long as the reporting was done with reasonable belief of the wrongdoing.

SUPPORT

Ryman employees are entitled to free, fully confidential, short-term counselling support via the employee assistance programme provided in New Zealand and Australia. Further information is available from

www.ocp.co.nz or 0800 377 990 (NZ)

accesseap.com.au or 1800 319 811 (AU)

REVIEW

This policy was reviewed by the Board of Ryman in September 2023 and shall be reviewed from time to time to ensure compliance with all applicable laws and practice guidelines.