

Communications Policy

Folkestone Limited and Folkestone Funds Management

Adopted by the Board of Folkestone Limited on 31 May 2018

Adopted by the Board of Folkestone Funds Management Limited on 31 May 2018

Adopted by the Board of Folkestone Investment Management Limited on 31 May 2018

Adopted by the Board of Folkestone Real Estate Management Limited on 31 May 2018

Adopted by the Board of Folkestone Maxim Asset Management on 31 May 2018



Folkestone

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CONTROL INFORMATION

Document Owner	Scott Martin
Maintained by	Scott Martin
Department	Folkestone Limited
File Location	CompliSpace
Next Review Date	March 2019

Version	Review Date	Changes Made	Reviewer	Approver	Communication Date
2	21/04/15	Annual review	Scott Martin	FLK Board	21/05/15
3	25/05/16	Annual review	Scott Martin	FLK Board	27/02/17
4	13/02/18	Annual review and minor drafting amendments	Mark Stewien	FLK, FFML, FIML, FSLML and Maxim Boards	29 May 2018

COMMUNICATIONS POLICY

1. BACKGROUND AND OVERVIEW

- 1.1 This Communications Policy has been prepared by Folkestone Limited ABN 21 004 715 226 and is relevant to both Folkestone Limited ("FLK") and its wholly owned subsidiaries' including Folkestone Funds Management Limited ("FFML") AFSL 340990, Folkestone Investment Management Limited ("FIML") AFSL 281544, Folkestone Seniors Living Management Limited ("FSLML") AFSL 238506 and Folkestone Maxim Asset Management Limited ("Maxim") AFSL 238349 ("together called the Group"). This policy is a joint policy and has been adopted by FLK, FFML, FIML, FSLML and Maxim as its Communications Policy.
- 1.2 The Group aims to effectively communicate with its shareholders, investors and key stakeholders as well as facilitating an efficient and informed market.
- 1.3 At all times when interacting with external individuals, investors, analysts and other market participants, the Group will adhere to the guiding principles set out in this policy.
- 1.4 This Policy should be read in conjunction with the Group's Promotional Materials Policy.

2. GUIDING PRINCIPLES

- 2.1 The Group applies the following guiding principles to communication materials:
 - a) timely and accurate information must be provided to shareholders/unitholders and the market;
 - b) information must be disseminated by channels prescribed by laws and other channels which the Group considers to be fair, timely and cost-efficient;
 - c) any personal comments or statements made to the media relating to other directorships or commitments must be made without reference to FLK, other than when required by law;
 - d) the Group will not discuss price sensitive information with an external party except where that information has previously been disclosed to the market; and
 - e) the Group will not under any circumstance breach any other legal requirement, company policy or law e.g. The Group's Privacy, Code of Conduct, or Issues and Breaches Policies and Insider Trading Laws.
- 2.2 This Communications Policy does not cover situations where there is a legal obligation or right not to disclose non-public, price-sensitive information e.g. under a Confidentially Agreement.

3. CONTACT WITH THE MARKET

3.1 Throughout the year the Group makes a number of regular disclosures to the market on its financial and operational results. The Group interacts regularly with the market in a variety of ways, including results briefings, market announcements, one-on-one briefings, meetings, property tours, presentations, speeches at industry conferences, research reports and educational sessions.

3.2 The Group's employees are committed to:

- a) timely communication that is factual and does not omit material information;
- b) effectively communicating with its investors in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions; and
- c) following the ASX Listing Rule 3.1 and the combined ASX and ASIC's best practice guide for listed entities' continuous disclosure known as the "Better Disclosure For Investors" document and ASIC's Regulatory Guide 198 (RG 198).

3.3 The Group's employees must not:

- a) make unauthorised disclosures of confidential information or use it for purposes other than those for which it was disclosed except as required by law; and
- b) use their position with the Group to attract media attention or commentary about their personal interests; and
- c) under any circumstance breach any other legal requirement, company policy or law e.g. the Group's Privacy, Code of Conduct, or Issues and Breaches Policies, Confidentiality Agreements and Insider Trading Laws.

4. COMMITMENT TO DISCLOSURE

4.1 ASX Listing Rule 3.1

FLK and the listed A-REITs for which the Group act as Responsible Entity adheres with ASX Listing Rule 3.1 which requires it to immediately disclose all information concerning the Group including any of its listed A-REITs which it manages (of which it is or becomes aware) that a reasonable person would expect to have a material effect on the price or value of particular securities (that is, the information would, or would be likely to, influence persons who commonly acquire securities, in deciding whether or not to apply for, acquire or dispose of those securities).

4.2 ASX Listing Rule 3.1 exceptions

ASX Listing Rule 3.1 does not apply to information that:

- a) a reasonable person would not expect to be disclosed;
- b) is confidential and the ASX has not formed a view that the information has ceased to be confidential;
- c) would be a breach of the law to disclose;
- d) concerns an incomplete proposal or negotiation;
- e) comprises of matters of supposition or is insufficiently definite to warrant disclosure;
- f) is generated for internal management purposes; and
- g) is a trade secret.

4.3 Inadvertent Disclosures of Price Sensitive Information

If any price sensitive information is inadvertently disclosed by an employee in discussions with any party outside the Group, the Company Secretary must be immediately notified, who will then proceed with the latter as if it were a notification under the continuous disclosure procedure. This procedure can be found in section 5 of this policy.

4.4 ASIC Regulatory Guide 198 (RG 198)

The Group follows Regulatory Guide 198 (RG 198) which provides guidance on how the continuous disclosure rules in the Corporations Act apply to unlisted funds, as well as an alternative disclosure regime based on website disclosure.

4.5 “Better disclosure for investors” document

The Group follows the “Better disclosure for investors” document prepared by the ASX and ASIC which provides practical steps that a listed entity can take to ensure that it meets both the letter and the spirit of the continuous disclosure requirements in the Corporations Law and the stock exchange listing rules, including online communication.

5. CONTINUOUS DISCLOSURE

5.1 To maintain its listing on the ASX, FLK and the listed A-REITs the Group manages, must comply with the requirements of the ASX’s Listing Rules (other than when waivers have been granted). Compliance with the Listing Rules has been given the force of law by sections 674, 793C and 1101B of the Corporations Act 2001 (Cth), which can impose onerous civil and criminal penalties on listed entities, and their directors and officers for non-compliance.

- 5.2 The Group will adhere to Regulatory Guide 198 (RG 198) which provides guidance on how the continuous disclosure rules in the Corporations Act apply to unlisted funds, as well as an alternative disclosure regime based on website disclosure.
- 5.3 In some circumstances the respective Boards of entities within the Group that the disclosure relates to, may approve communications in a “black-out” period provided such communication does not disclose information that may have a material effect on the share price which has not been previously disclosed to the market.

6. COMMUNICATION “BLACK-OUT” PERIODS

- 6.1 To protect against inadvertent disclosure of inside information, the Group imposes communication “black out” periods between the start of the final month of its financial reporting periods (ie. 1 June and 1 December respectively) and the date of announcements of those results to the market, as well as in the period between dispatching Notices of an Annual General Meeting/General Meeting to security holders and the holding of that Meeting when updated financial information may be given to security holders and the market.
- 6.2 In the “black-out” periods, the Group will not hold:
- a) one on one briefings with institutional investors, individual investors or stockbroking analysts to discuss financial information concerning FLK or any of the listed REITs it manages; or
 - b) open briefings other than to deal with matters which are the subject of an announcement to the ASX.
- 6.3 These blackout periods do not relieve the Group from complying with its continuous disclosure obligations under the ASX Listing Rules.
- 6.4 All staff will be notified of the black-out periods by the Company Secretary.

7. MANAGING COMMUNICATION MATERIALS

- 7.1 All external communications by the Group will:
- a) be factual and subject to internal vetting/verification and authorisation before issue;
 - b) not omit material information;
 - c) have technical advice such as tax and legal sought if required to comply with regulatory and statutory requirements;
 - d) be timely and expressed in a clear and objective manner; and

- e) have a full copy of the verification on record; and
- f) be added to the relevant Register.

7.2 Price Sensitive Communication

All price sensitive communications including ASX Announcements and Annual Reports are, before release, to be verified and approved by at least two authorised persons and the respective Board prior to release (with at least one of those authorised persons to be the Managing Director, Company Secretary or Head of Funds Management). This authority includes compliance with any continuous disclosure requirements such as being full, fair, timely and accurate. Authorised persons for each entity are as follows:

FLK	FFML	FIML	FSLML	Maxim
Chairman	RE Chairman	RE Chairman	RE Chairman	Managing Director
Managing Director	Managing Director	Managing Director	Managing Director	Managing Director – Maxim Funds
Company Secretary	Company Secretary	Company Secretary	Company Secretary	Company Secretary
Head of Funds Management	Head of Funds Management	Head of Funds Management	Head of Funds Management	Head of Funds Management
Head of Real Estate	CFO Funds	CFO Funds	CEO Seniors Living	Investor Relations Manager
General Counsel	Head of Real Estate	CEO Social Infrastructure Funds	General Counsel	
Investor Relations Manager	General Counsel	General Counsel	Investor Relations Manager	
	Investor Relations Manger	Investor Relations Manager		

Please note, any external communications in relation to the Folkestone Maxim A-REIT Securities Fund are to be reviewed and approved by the external RE.

7.2.1 No price sensitive communication materials may be issued or existing communication materials amended without the express approval of two of the above.

7.2.2 A copy of all price sensitive external communications are to be issued to the authorised parties stated above and all board members and senior management prior to release.

7.3 Mass External Communications

No mass external communication materials may be issued or existing communication materials amended without the express approval of at least two authorised persons. This authority includes compliance with relevant laws and to ensure that there are no statements which could be interpreted as misleading and deceptive, or as being in breach of copyright laws or our contractual obligations to third party data suppliers.

All mass external investor communication materials including fund updates and advertising materials (Maxim flyer), before release, are to be verified and approved by at least two authorised persons. This authorisation includes compliance with any continuous disclosure requirements such as being full, fair, timely and accurate. Authorised persons

for each entity are as follows:

FLK	FFML	FIML	FSLML	Maxim
Chairman	RE Chairman	RE Chairman	RE Chairman	Managing Director
Managing Director	Managing Director	Managing Director	Managing Director	Managing Director – Maxim Funds
Company Secretary	Company Secretary	Company Secretary	Company Secretary	Company Secretary
Head of Funds Management	Head of Funds Management	Head of Funds Management	Head of Funds Management	Head of Funds Management
Investor Relations Manager	CFO Funds	CFO Funds	CEO Seniors Living	Investor Relations Manager
	Investor Relations Manger	CEO Social Infrastructure Funds	Investor Relations Manager	
		Investor Relations Manager		

7.4 Group Promotional Material Communications

The Corporations Act, other laws, and our contractual requirements place a number of obligations on the Group and its wholly owned subsidiaries when issuing promotional material about financial products. These obligations cover specific disclosure requirements in our advertising and promotional materials including our website, research reports, product brochures and presentations.

All mass external promotional/marketing communications are, before release, to be verified and approved by at least two authorised persons. This authorisation includes compliance with any continuous disclosure requirements such as being full, fair, timely and accurate.

For more information on the Group's promotional materials processes and requirements please read FLK's Promotional Materials Policy.

8. PUBLICATION DISTRIBUTION

8.1 Price Sensitive Communication

All price sensitive information relating to FLK or a listed A-REIT managed by the Group for public announcement, once verified, will be:

- a) lodged with ASX as soon as practicable and before external disclosure elsewhere; and
- b) posted on the FLK and respective Fund websites as soon as practicable after lodgement with ASX.

8.2 Mass External Communications

All mass external communication for announcements, once verified, will be:

- a) posted on the FLK and respective Fund website as soon as practicable; and
- b) distributed to the relevant contacts where required.

8.3 Material Communications for Funds

ASIC now allows unlisted disclosing entities to disclose material information through a dedicated section of their website, rather than by lodging continuous disclosure notices with ASIC, provided certain requirements are met. These requirements are set out in Note 5.

9. AUTHORISED FLK GROUP SPOKESPERSONS

9.1 The only Group employees authorised to speak on behalf of the Group to investors, media, regulators and stakeholders in general are the:

FLK	FFML	FIML	FSLML	Maxim
Chairman	RE Chairman	RE Chairman	RE Chairman	Managing Director
Managing Director	Managing Director	Managing Director	Managing Director	Managing Director – Maxim Funds
Company Secretary	Company Secretary	Company Secretary	Company Secretary	Company Secretary
Head of Funds Management	Head of Funds Management	Head of Funds Management	Head of Funds Management	Head of Funds Management
Head of Real Estate	CFO Funds	CFO Funds	CEO Seniors Living	Investor Relations Manager
Investor Relations Manager	Head of Real Estate	CEO Social Infrastructure Funds	Investor Relations Manager	
	Investor Relations Manger	Investor Relations Manager		

9.2 Any exceptions to the above must be authorised by the Chairman, Managing Director or Company Secretary.

9.3 Those employees authorised to speak on behalf of the Group and its wholly owned subsidiaries may clarify information that has been publicly released but must not comment on price sensitive information that has not been disclosed to the market generally.

9.4 If any other employee receives a request for comment from an investor, analyst or the media in relation to any matter concerning the Group, they must advise that person that they are not authorised to speak on behalf of the Group and must refer enquiries to the appropriate executive.

10. COMMUNICATIONS WITH SHAREHOLDERS AND INVESTORS

10.1 Reports To Shareholders, Analysts and Rating Agencies

FLK produces reports with financial information for shareholders:

- a) Annual Report for the year ending 30 June; and
- b) Half Year Report for the six months ending 31 December.
- c) Investor Review – six monthly

FFML produces four sets of reports with financial information for investors in funds or schemes managed by them:

- a) Annual Report for the year ending 30 June;
- b) Quarterly Report for the quarter ending 31 March;
- c) Half Year Report for the six months ending 31 December; and
- d) Quarterly Report for the quarter ending 30 September.

FIML produces two sets of reports with financial information for investors in funds or schemes managed by them:

- a) Annual Report for the year ending 30 June; and
- b) Half Year Report for the six months ending 31 December.

FSLML produces four sets of reports with financial information for investors in funds or schemes managed by them:

- a) Annual Report for the year ending 30 June; and
- b) Quarterly Reports for the quarters ending 31 March, 30 September and 31 December.

Maxim produces reports with financial information for investors in funds or schemes managed by them

- a) Monthly report

Note, the annual report for the Folkestone Maxim A-REIT Securities Fund is prepared and issued by the external RE.

10.2 Annual General Meetings

FLK usually holds its Annual General Meeting (AGM) in October of each year. The Notice of Meeting will be accompanied by explanatory notes on the items of business and together they will seek to clearly and accurately explain the nature of business of the meeting. A full copy of the past five years Notice of Meetings are available on FLK's website.

10.3 Websites

FLK and the Group’s funds maintain websites providing information on its products, services and businesses, as well as information useful to shareholders, unitholders and the market.

FLK and the Group’s funds post all recent price sensitive information and the majority of mass external communications on their respective websites.

10.4 Shareholder & Unitholders Queries

Shareholder and unitholder queries should always be handled with courtesy, objectively and expeditiously by an authorised person. Any complaints should be dealt with in accordance with FLK’s Complaints Policy.

11. MEDIA RELEASES AND OTHER DEALINGS WITH THE MEDIA

11.1 Media Releases

Any media release for FLK or a listed A-REIT managed by the Group containing price sensitive information must be sent to the ASX, and other regulator as required, before it is released to the media.

All media releases, before release, are to be verified and approved by at least two authorised persons and the respective Boards. This authorisation includes compliance with any continuous disclosure requirements such as being full, fair, timely and accurate. Authorised persons include:

FLK	FFML	FIML	FSLML	Maxim
Chairman	RE Chairman	RE Chairman	RE Chairman	Managing Director
Managing Director	Managing Director	Managing Director	Managing Director	Managing Director – Maxim Funds
Company Secretary	Company Secretary	Company Secretary	Company Secretary	Company Secretary
Head of Funds Management	Head of Funds Management	Head of Funds Management	Head of Funds Management	Head of Funds Management
Head of Real Estate	CFO Funds	CFO Funds	CEO Seniors Living	Investor Relations Manager
Investor Relations Manager	Head of Real Estate	CEO Social Infrastructure Funds	Investor Relations Manager	
	Investor Relations Manger	Investor Relations Manager		

11.2 Inadvertent Disclosures

If any price sensitive information is inadvertently disclosed by a staff member in discussions with the media, the Company Secretary & Investor Relations Manager must be immediately notified.

11.3 Leaks, Rumours and Speculation

The Group's policy is to not comment on speculation and staff should not be drawn into a discussion of leaks, rumours and speculation. If a response is required by law or pursuant to a request from a relevant exchange or regulator then staff should refer enquiries to the Company Secretary.

12. BUSINESS CONTINUITY PLAN COMMUNICATION

12.1 If the Business Continuity Plan ("BCP") is activated the following people are authorised to speak on behalf of the Group:

- a) Chairman;
- b) Managing Director;
- c) Company Secretary; and
- d) Head of Funds Management.

12.2 Once the Board has been notified, guidance will be provided for the following:

- a) who is affected;
- b) who needs to be notified;
- c) what type of communication is to be used;
- d) the timing of announcement and length of BCP usage/activation; and
- e) if any follow-up communication is necessary.

12.3 Once the above has been decided, the required stakeholders will be informed by either/or press release, briefing, presentation, or website update, MMS, SMS or email notification.

12.4 The Board will decide if follow-up communication is to be provided depending on the length and severity of the business interruption and if changes to the situation occur.

13. POLICY BREACHES

13.1 Breaches of this policy are considered to be serious and may lead to disciplinary action being taken against the employee including dismissal.

14. REVIEW

14.1 A review of this Policy will be undertaken annually by the Compliance Officer.

14.2 The Group may change this policy from time to time.



ANNEXURE A – Folkestone Price Sensitive Announcement/Publication Verification

Folkestone Limited

Name of Announcement/Publication:

Date:

Direction	Responsibility	Sign/Date
1. Draft for review circulated and feedback obtained and dealt with	Marketing Team	
2. Verification reviewed and queries dealt with	Marketing Team	
3. Is external legal sign off / disclaimer required? Yes / No If yes, do we need an updated disclaimer sign-off from Clayton Utz?	Marketing Team	
4. Sign off completed prior to release by FLK (where necessary)		
<ul style="list-style-type: none"> > Chairman > Managing Director > Company Secretary > Head of Funds Management > Head of Real Estate (where applicable) > Investor Relations Manager 		
5. Confirmation received from Folkestone Limited Board	Marketing Team	
6. ASX confirmation received	Marketing Team	
7. Email announcement to Board and Senior Management and relevant distribution list	Marketing Team	
8. Price Sensitive Announcement Register updated	Marketing Team	
9. Website updated	Marketing Team	



ANNEXURE B - Folkestone Mass External Announcement/Publication Verification

Folkestone Limited

Name of Announcement/Publication:

Date:

Direction	Responsibility	Sign/Date
1. Draft for review circulated and feedback obtained and dealt with	Marketing Team	
2. Verification reviewed and queries dealt with	Marketing Team	
3. Is external legal sign off / disclaimer required? Yes / No If yes, do we need an updated disclaimer sign-off from Clayton Utz?	Marketing Team	
4. Sign off completed prior to release by FLK (where necessary)		
<ul style="list-style-type: none"> > Chairman > Managing Director > Company Secretary > Head of Funds Management > Investor Relations Manager 		
5. Email announcement to Board and Senior Management and relevant distribution list	Marketing Team	
6. Mass External Communication Register updated	Marketing Team	
7. Website updated	Marketing Team	



ANNEXURE C – Funds Management Price Sensitive Announcement/Publication Verification

Folkestone Funds Management Limited (“FFML”) AFSL 340990
 Folkestone Investment Management Limited (“FIML”) AFSL 281544
 Folkestone Seniors Living Management Limited (“FSLML”) AFSL 238506
 Folkestone Maxim Asset Management Limited (“Maxim”) AFSL 238349

Name of Announcement/Publication:

Date:

Direction	Responsibility	Sign/Date
1. Draft for review circulated and feedback obtained and dealt with	Marketing Team	
2. Verification reviewed and queries dealt with	Marketing Team	
3. Is external legal sign off / disclaimer required? Yes / No If yes, do we need an updated disclaimer sign-off from Clayton Utz?	Marketing Team	
4. Sign off completed prior to release by FFML, FIML, FSLML and Maxim (where necessary)		

FFML	FIML	FSLML	Maxim
RE Chairman	RE Chairman	RE Chairman	*Managing Director
*Managing Director	*Managing Director	*Managing Director	Managing Director – Maxim Funds
*Company Secretary	*Company Secretary	*Company Secretary	*Company Secretary
*Head of Funds Management	*Head of Funds Management	*Head of Funds Management	*Head of Funds Management
CFO Funds	CFO Funds	CEO Seniors Living	Investor Relations Manager
Head of Real Estate	CEO Social Infrastructure Funds	General Counsel	
General Counsel	General Counsel	Investor Relations Manager	
Investor Relations Manger	Investor Relations Manager		

*At least one of these persons must by an approver of price sensitive announcements

5. Confirmation received from Folkestone Limited Board	Marketing Team	
6. ASX confirmation received	Marketing Team	

7. Email announcement to Board and Senior Management and relevant distribution list	Marketing Team
8. Price Sensitive Announcement Register updated	Marketing Team
9. Website updated	Marketing Team



ANNEXURE D – Funds Management Mass External Announcement/Publication Verification

Folkestone Funds Management Limited (“FFML”) AFSL 340990
 Folkestone Investment Management Limited (“FIML”) AFSL 281544
 Folkestone Seniors Living Management Limited (“FSLML”) AFSL 238506
 Folkestone Maxim Asset Management Limited (“Maxim”) AFSL 238349

Folkestone Limited

Name of Announcement/Publication:

Date:

Direction	Responsibility	Sign/Date
1. Draft for review circulated and feedback obtained and dealt with	Marketing Team	
2. Verification reviewed and queries dealt with	Marketing Team	
3. Is external legal sign off / disclaimer required? Yes / No If yes, do we need an updated disclaimer sign-off from Clayton Utz?	Marketing Team	
4. Sign off completed prior to release by FFML, FIML, FSLML and Maxim (where necessary)		

FFML	FIML	FSLML	Maxim
RE Chairman	RE Chairman	RE Chairman	Managing Director
Managing Director	Managing Director	Managing Director	Managing Director – Maxim Funds
Company Secretary	Company Secretary	Company Secretary	Company Secretary
Head of Funds Management	Head of Funds Management	Head of Funds Management	Head of Funds Management
CFO Funds	CFO Funds	CEO Seniors Living	Investor Relations Manager
Investor Relations Manger	CEO Social Infrastructure Funds	Investor Relations Manager	
	Investor Relations Manager		

7. Email announcement to Board and Senior Management and relevant distribution list	Marketing Team	
8. Mass External Communication Register updated	Marketing Team	
9. Website updated	Marketing Team	