

PURPOSE

At Ingenia Communities (Ingenia or Group) we conduct all our business affairs legally, ethically and with strict observance of the highest standards of integrity and propriety. Ingenia requires its employees actively uphold the best interests of the Company and meet these high standards. Ingenia takes seriously its obligations to comply with all federal, state, and local government laws and regulations, as well as common law obligations, and requires all employees to do the same.

Ingenia is a listed stapled entity which is required to comply with ASX Corporate Governance Principles and Recommendations, which includes this policy.

This policy outlines what constitutes appropriate behaviour and standards at Ingenia. Breaches of these standards will be dealt with in accordance with the Group's Discipline and Termination Policies, which may include termination of employment and in the case of serious misconduct, may result in instant dismissal. In cases where a breach involves a breach of any law then the relevant government authorities or the police will be involved.

SCOPE

This policy applies to all Ingenia employees, directors, board members, temporary workers, and independent contractors (collectively referred to in this policy as 'employee/s').

POLICY STATEMENT

The way in which we conduct ourselves personally and the way in which we do business are guided by our four core values and are central to everything we do.

Customer Obsessed - We believe in extraordinary service for our customers. Extraordinary, never ordinary. We believe in the power of belonging to create an unforgettable and irreplaceable sense of community for all those we serve. We want customers to know that wherever they come from, and wherever they find us, our reason for being, is them. Their experience is everything to us. Experiences forged from empathy, imagination and a relentless obsession with their happiness. So, we believe in the power of stepping outside of our comfort zones, of going the extra mile, and of finding a way to yes.

Make It Count - We believe in doing what matters. We believe that if something's worth doing, it's worth doing right. Because just doing stuff is not enough. We make it count - we don't believe in short cuts or half-heartedness. We believe the buck stops with us and starts with us. We believe that excellence is a state of mind fuelled by learning. And because we matter to each other, we always deliver on our promises.

We Before Me – We believe in us. We believe that each one of us is responsible for lifting the group higher. We all have skin in the game, and we know that with our collective wisdom we can achieve great things. We are generous and we see the good in each other. We pay it forward. We are curious listeners who seek to understand the impact we have on each other and our community. Because community is who we are, and what we create, together. So, we never ever let anyone feel

that they don't belong.

Today and Tomorrow – We value today and tomorrow. We believe in brighter futures shaped by our conscious and collective choices today. We believe in taking big bold leaps towards our goals and having the courage to hear dissenting voices. Because we know that it is together that we will make things better and be better. We believe in shared goals and shared fate. So, we never place the needs of today over the needs of tomorrow. And we believe that better tomorrows will dawn through our commitment to, and care for, our communities.

While not expressly outlined in this policy, the Ingenia Team Way is how we bring behaviours associated with our values to life. The Ingenia Team Way is how we show up every day. When each of us lives the behaviours, we build trust, strengthen our culture, and create better outcomes for our teams, residents and communities. Coverage of this policy includes consideration of the Ingenia Team Way.

1. RESPONSIBILITIES

1.1. PERSONAL CONDUCT

Employees are expected to treat all other employees and persons with whom they deal on behalf of Ingenia with respect, and are expected to observe the highest standards of ethics, integrity and behaviour during their course of employment with Ingenia, which includes but is not limited to the following:

- Behave in an honest, fair, and equitable manner in all dealings with customers, suppliers, competitors & fellow employees;
- Do not engage in harassing behaviour, including sexual harassment, or bullying behaviour towards customers, suppliers, competitors & fellow employees;
- Act in accordance with Ingenia guidelines, policies and procedures, and standards of operations at all times;
- Comply with all reasonable and legal instructions of Managers;
- Maintain punctuality – Ingenia operates to tight deadlines and requires everyone's cooperation;
- Observe work health and safety rules and regulations and always put safety first;
- Ensure the highest standards of quality in all products and services;
- Respect the Company's ownership of all Company's funds, equipment, supplies, records, and property;
- During and after employment with Ingenia, maintain the confidentiality of any confidential information, records or other materials and do not share with competitors, clients, customers, and the media;
- Always acknowledge other people's work and ideas;
- Ensure compliance with all environmental laws and standards;

- Do not make any unauthorised statements to the media about Ingenia's business (requests for media statements should be referred to the General Manager Investor Relations & Sustainability);
- Do not engage in fighting or aggressive language in the workplace;
- Do not engage in aggressive or disrespectful behaviour towards any person, including but not limited to: verbal, non-verbal or written abuse, threats, intimidation, harassment, or any form of physical, verbal or written aggression.
- Do not discriminate based on characteristics, such as sex, race, disability, pregnancy, age, marital status, sexual orientation;
- Do not perpetrate, permit, or fail to report violations of any federal, state, or local government law or regulation; the same applies for Company policies and procedures;
- Do not use drugs or alcohol on the premises or come to work affected by either;
- Do not use Ingenia equipment for personal use without expressed prior permission, including but not limited to electronic devices and tools of the trade.

1.2. PROHIBITED BEHAVIOURS

We have zero tolerance for fraud, bribery and corruption. All Ingenia employees and directors are prohibited from the following:

- Any form of dishonesty or malpractice. This includes any practice, behaviour or activity which is illegal, unethical, or improper carried out by an employee which results in a loss (financial or otherwise) to, or is not in the best interests of, Ingenia;
- Theft or misappropriation of Ingenia assets including property, product, monies, and information, and additionally property belonging to customers or fellow employees;
- Taking, appropriating and/or not declaring Company monies;
- Failing to bank Company monies in the appropriate manner and timeliness as instructed;
- The giving of unauthorised discount/s to staff, customers, or suppliers;
- Manipulation of Point of Sale system, sales records, invoices or orders, trading return, or banking documentation to provide deceptive figures or to conceal losses;
- Falsifying Company records, including but not limited to timesheets, rosters, and safe access forms;
- Disposing of Ingenia assets or property in any way without the appropriate documentation and approval;
- Giving or receiving a loan of Company money, property, or merchandise;
- Assisting any other persons in the conduct of dishonest activities, whether or not a personal gain is made;
- Actively participating in theft, or passively supporting theft or dishonest activity including

by failure to report such theft or activity to the Company, through the correct channels.

- These examples are not intended to represent an exhaustive list of prohibited behaviours and actions.

1.3. CONFIDENTIALITY, PRIVACY AND DISCLOSURE

Employee are expected to handle information with care. In particular, the confidentiality of all information must be safeguarded, even after you leave Ingenia. You must not misuse information obtained at work either for financial reward or personal gain.

Ingenia is committed to ensuring the confidentiality and security of the personal information of our people and security holders. We are bound by the Australian Privacy Principles under the Privacy Act 1998 (Cwlth) and any other privacy laws which govern the way in which organisations (such as Ingenia Communities) hold, collect, use, and disclose personal information. Further details may be obtained from the Ingenia Communities Privacy Policy on the Ingenia Communities website, or by contacting the Privacy Officer on privacy@ingeniacommunities.com.au

As an employee you must not access or request or make improper use of or transfer or disclose confidential information to anyone else except as required by your position or as authorised or legally required. If it inadvertently comes into your possession, it should be returned immediately.

If you are required by an authority to provide confidential information that has not been otherwise authorised, you must notify your manager, the privacy officer, or the company secretary.

1.4. CONFLICT OF INTEREST

In all circumstances, employees are required to avoid conflict of interests between their private activities and company responsibilities and not take improper advantage of their position or of information obtained in the course of their employment. Employees are required to disclose actual or potential conflicts to their Manager. Directors are to consult with the chairman of the board in relation to potential conflicts of interest, which will then be taken to the board for consideration if required.

1.5. ACCEPTANCE OF OPPORTUNITIES, GIFTS AND INVITATIONS

You will only use Ingenia's property, information, your position, and opportunities which arise from these for a proper purpose and not to improperly gain benefit for yourself or for another party.

While it is recognised that corporate hospitality is given and received as part of building normal business relationships, as a general rule you should not accept gifts, hospitality or other favours which might appear to place you under an obligation, other than for very small value items or consumables such as pens with a company logo, or occasional business entertaining including lunch or dinner.

Under no circumstances are employees allowed to accept gifts such as:

- Cash or the acceptance of goods or services free of charge or at artificially low prices;
- Payment of bills including accommodation when travelling;
- Holidays or weekend accommodation of any nature.

Bribery of any form is unacceptable. No undeclared offers or payments will be accepted or solicited by you or made by you to third parties, and you are required to avoid any contacts that might lead to, or suggest, a conflict of interest between your personal activities and the business of Ingenia.

Ingenia expects all its employees to abide by relevant laws and regulations. Furthermore, you are expected to avoid doing business with any individual, company or institution if that business is connected with activities which are illegal, or which could be regarded as unethical. Please refer to Ingenia's Gifts and Hospitality Policy or contact hr@ingeniacommunities.com.au for further information.

1.6. PROTECTION AND USE OF COMPANY PROPERTY

All employees are expected to exercise care towards company property which includes buildings, computer hardware, networks and software, vehicles, stock, tools, equipment etc and to report any misuse, neglect, or hazard to their manager.

Company property is not to be used by employees for personal purposes or taken off site without prior approval from the Senior Manager.

1.7. WORKPLACE HEALTH AND SAFETY

Employees are expected to take all reasonable actions to assist the business to achieve its health and safety objectives to:

- Eliminate workplace injuries;
- Identify and remove any hazards prior to an injury occurring;
- Keep all workers, residents, guests, and visitors safe.

Employees are expected to adopt the "you see it, you own it" attitude to risk identification. Put simply this means, if you see a potential hazard, you are responsible for ensuring the hazard is removed and/or for reporting it to the relevant person in a timely manner. Employees are required to perform their duties in accordance with the legal duty of care, statutory obligations and the Work Health and Safety policy and procedures. Everyone is responsible for safety. For further information, please contact hse@ingeniacommunities.com.au.

1.8. INSIDER AND PERSONAL TRADING

Insider trading activities are strictly prohibited by law and therefore you and your associates must not enter –or give the appearance of engaging in – private transactions based upon insider trading.

To safeguard the Group against the potential risks associated with non-compliance with the Insider Trading prohibition, a number of controls and procedures have been put in place to mitigate against the risk against Insider Trading. These include:

- the use of open and closed periods during which directors and employees may or may not deal in the Group securities; and
- the requirement for approval to be obtained prior to dealing.

Please refer to the Personal Trading Policy for more detail.

1.9. WHISTLEBLOWER POLICY

Ingenia promotes a culture of open communication and encourages all staff to approach management with any issues they may have.

Ingenia recognises that from time to time employees may become aware of serious issues in the workplace that have the potential to cause damage to our brand name, reputation, and team.

The purpose of the Whistleblower Policy is to outline the procedure for someone to take if they become aware of any serious issues or breaches of the Code of Conduct. The Policy is designed to complement the normal communication channels between parties to address questions, concerns, suggestions, or complaints. Please refer to the Whistleblower Policy for more detail.

1.10. ENVIRONMENT & CLIMATE

In managing the Ingenia's properties and other aspects of the business, full consideration is given to the impact on the environment and climate change risks, including energy efficiency. A high level of importance is placed on sustainability when developing the Ingenia's properties.

In addition, the Board recognises that a sustainable future for its business depends upon sustainability of the communities, economy, and society in which it operates.

1.11. HUMAN RIGHTS

Ingenia is committed to respecting Human Rights consistent with the Universal Declaration of Human Rights. We stand behind efforts to stop modern slavery in business operations and supply chain through our modern slavery program. Across our operations and supply chain, we aim to ensure that we, along with our suppliers of goods and services and other business partners, operate in a way that is ethical, responsible, and respectful of human rights.

1.12. LAWS & REGULATIONS

We are committed to conducting our business with integrity and in compliance with all applicable laws and regulations. Compliance is fundamental to maintaining the trust of our employees, customers, business partners, and the communities we operate in. Our regulatory obligations are integrated into internal policies, procedures and business practices. All employees are expected understand and be familiar with policies and procedures which apply to their roles and complete all training provided by Ingenia.

1.13. RESPONSIBILITIES TO SECURITY HOLDERS AND THE COMMUNITY

Ingenia is committed to providing value to its security holders and recognising the legitimate interests of other stakeholders. Ingenia has policies regarding the timely provision of information to its security holders and other stakeholders including posting information to its website. It has processes to ensure that the accounts and financial information it provides represent a true and fair view of the financial performance and position of Ingenia.

You must fully cooperate with, and not make any false or misleading statement to, or conceal any relevant information from, Ingenia's auditors. Deliberate falsification of business records is a serious breach of this policy.

MONITORING AND REPORTING

Ingenia will review this document from time to time and may change the contents in line with business needs and relevant legislation. If changes are made to this policy, the updated version will be available on the intranet. It is then up to each employee to ensure they read and understand them. If an employee is unclear on any details in this document, they should speak with their Manager, Group Compliance or People and Culture. Employees should aim to familiarise themselves with this policy on a regular basis.

2. BREACHES AND EXCEPTIONS

All employees are expected to familiarise themselves with this Code of Conduct Policy and ensure that its provisions are fully observed at all times. All employees have an obligation to report any breaches of Ingenia guidelines, policies and procedure or other activity which leads them to believe or suspect that dishonest activities, fraud, theft, or irregular transactions are occurring or likely to occur.

These concerns are to be communicated to a member of the People and Culture team or escalated through one of the Ingenia Whistleblower reporting channels available via the Ingenia Communities website, in the knowledge that the information will be treated with the strictest confidence.

When assessing perceived or actual breaches of the Code of Conduct, the following principles will be adhered to:

- the affected person/s must be given the opportunity to present their case and have that information considered before any decision is made; and
- the decision maker must have no personal interest in the matter to be decided, have no bias as to the outcome, and act in good faith throughout the process.

Any incident that People and Culture deem a breach as per Ingenia's legislative or regulatory obligations under its Australian Financial Services licence will be reported to the Board via the Audit Risk and Sustainability Committee (which forms part of Risk and Compliance reporting). Any material or significant breaches will be reported immediately.

All breaches of this policy will be dealt with in accordance with Ingenia's Discipline and Termination Policies.

REVIEW OF POLICY

The Group Risk & Compliance Manager or the General Manager People & Culture will review this Code of Conduct Policy on an annual basis or as required.

Any queries or questions regarding this policy can be directed to the Group Risk & Compliance Manager or the General Manager People & Culture.