

## 1.0 Policy and Purpose

Ingenia Communities (Ingenia or Group) conducts all its business affairs legally, ethically and with strict observance of the highest standards of integrity and propriety and takes seriously its obligations to comply with all federal, state and local government laws and regulations.

Bribery and corruption are unacceptable in any form and Ingenia requires all employees to ensure that any business dealings in which they are involved in remain free from real or perceived bribery or corruption.

This policy sets out the standards expected of all employees in observing and upholding the prohibition of bribery and improper conduct and provides guidance on how to recognise and deal with instances of bribery and corruption.

Ingenia employees must:

- Not give, offer, accept or request bribes, facilitation payments, secret commissions or other prohibited payments, or cause any of them to be given, offered, accepted or requested;
- Not approve any offers, or make, accept or request irregular payment or other thing of value to win business or influence a business decision in favour of Ingenia;
- Not offer or receive any gifts, entertainment or hospitality to or from public officials without approval and may only do so in accordance with Ingenia's Gifts & Hospitality Policy and Political Donation Policy;
- Comply with any reporting and approval processes for gifts and hospitality;
- Maintain appropriate records of dealing with third parties in accordance with relevant policies;
- Report any breaches of suspicious or actual behaviour related to this policy.

## 2.0 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') and is to be read in conjunction with other relevant Ingenia policies including the Code of Conduct, Conflict of Interest, Political Donation and Gifts & Hospitality policies.

## 3.0 Bribery and Corruption

**Bribery** is the offer, promise, giving, requesting, authorising or receiving of anything of value (whether financial or other advantage) directly or indirectly to another person (including public officials, suppliers, customers, third parties etc.) with the intention of influencing, rewarding or inclining that person to act contrary to accepted rules of honesty or integrity. Merely offering a bribe will usually be sufficient for an offence to be committed.

Bribery can take many forms and the benefit being offered, given or accepted may be monetary or non-monetary. That is, it may include non-cash gifts, reciprocal favors, political or charitable

donations, loans or lavish corporate hospitality. It can also be direct or indirect, such as through intermediaries or agents.

**Corruption** is an act or omission for an improper or unlawful purpose, which involves the abuse of a position of power or trust. It includes dishonest activity in which an employee or contractor acts contrary to the interests of the company and abuses their position of trust in order to achieve some personal gain or advantage for themselves or for another person or entity.

Examples of corrupt conduct include but are not limited to:

- Payment of secret commissions (bribes or gratuities) in money, or some other value, to other businesses, individuals or public officials;
- Receipt of bribes or gratuities from other businesses, individuals or public officials;
- Release of confidential information, for other than a proper business purpose, sometimes in exchange for either a financial or non-financial advantage;
- Money Laundering;
- A conflict of interest involving a staff member acting in his or her own self-interest rather than the interests of Ingenia.

#### 4.0 Facilitation Payments and Secret Commissions ('Kickbacks')

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

Secret commissions typically arise where a person or entity offers or gives a commission to an agent or representative of another person that is not disclosed by that agent or representative to their principal.

Ingenia does not make, and will not accept, facilitation payments or secret commissions of any kind.

If you or another employee is asked to make a payment of this nature on the Company's behalf or are offered any kind of kickback, immediately refuse and report the matter to Ingenia's Group Compliance Manager or to a member of the Executive.

#### 5.0 Gifts and Hospitality

Whilst Ingenia recognises that accepting or offering gifts, entertainment or hospitality of moderate value is customary in the course of business and local practice, it prohibits the offering of gifts, entertainment and hospitality in circumstances which it could be considered to give rise to undue influence. Such instances ought to be one-off, irregular, of low nominal value and typically for the purpose of general relationship building only.

Ingenia's Gifts & Hospitality Policy sets out how to deal with offering and accepting gifts, entertainment and hospitality including what is deemed appropriate, monetary values as well as recording and reporting requirements.

## **6.0 Political and Charitable Donations**

All dealings with politicians and government officials must be done with caution and must always be dealt with at arm's length to avoid any perception of attempting to gain advantage. Employees are expressly prohibited from making, promising, offering or authorising a payment of anything of value, either directly or indirectly to a government official except as otherwise set out in Ingenia's Political Donation and Gifts & Hospitality Policies, which limits entertainment, meals and hospitality to low nominal value in accordance with accepted local social custom.

If dealing with suppliers in other countries, care must be taken to ensure that local charities are not used as a screen for illegal bribes and that the charity or cause is legitimate.

If political and charitable donations are made, they must be authorised at a corporate level, usually by the Group Compliance Manager in conjunction with the CEO and the Board.

## **7.0 Dealings with Third Parties**

Third parties (including agents, distributors, suppliers, purchasers or contractors) may pose a risk to Ingenia breaching anti-bribery and corruption laws and rules particularly where they are involved in negotiating any business arrangements or transactions (including supply, tenders, contracts etc.) on behalf of Ingenia.

Any employee engaging a third party must implement controls to ensure that the actions of that third party will not adversely affect Ingenia.

In the event you are unsure as to what controls may need to be put in place to mitigate potential risks, contact the Group Compliance Manager for advice.

## **8.0 Record Keeping**

All accounts, invoices or other documents and records relating to dealings with third parties including politicians, political parties, charities suppliers, contractors, customers and other third parties, must be prepared and maintained with strict accuracy and completeness.

All expenditure including on gifts, entertainment, hospitality and donations must be included in expense reports and registered and approved in accordance with relevant expense and other company policies and procedures.

Internal controls systems and procedures adopted to comply with this policy will be subject to regular internal audits by the Compliance Manager to provide assurance that they are effective in mitigating the risk of non-compliance.

## **9.0 Reporting Suspicious Behaviour**

It is the responsibility of all employees to report all suspected, attempted or actual bribery or corruption incidents. This includes any behaviour that makes an employee feel they are being pressured or threatened to engage in improper conduct. All information received is treated confidentially and investigations will not be disclosed or discussed with anyone other than those who have a legitimate need to know. It is important that the employee also maintain confidentiality in order to avoid idle gossip and the possibility of defamation proceedings.

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. No employee will suffer demotion, penalty or other adverse consequences for refusing to pay bribes or reporting actual or suspected breaches of this policy. Ingenia aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Any reports should be made to the Group Compliance Manager in the first instance.

## **10.0 Document Review and Refresher**

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, the Group Compliance Manager or the General Manager People and Culture. Employees should aim to have a read of this policy every couple of months to refresh their memory.

## **11.0 Breaches of Policy**

All employees are expected to familiarise themselves with the Anti-bribery and Corruption policy and ensure that its provisions are observed. All employees have an obligation to report any breaches of Ingenia guidelines, policies and procedure or other activity to their line manager, Senior Manager or Human Resources.

Bribery or corruption committed against Ingenia is a major concern and as a consequence all cases will be thoroughly investigated, and appropriate disciplinary action will be taken against any employee who is found guilty of such conduct. This may include termination of employment and/or referral of the matter to the appropriate law enforcement or regulatory agencies.