

At Ingenia Communities Group, our vision is to create the best lifestyle and holiday communities in Australia. We are committed to achieving this by operating in a way that is sustainable and that contributes positively to the communities in which we operate and the environment. We seek to do business with ethically, environmentally and socially responsible suppliers and to work in partnership with them in a way that is consistent with the Group's values, purpose and strategy.

Our suppliers include all organisations from which we procure goods and services in the development and operation of our communities and in our corporate business activities. Recognising the diverse nature of the business and the regional location of many assets, we proactively seek to engage and support local businesses in the communities in which we operate. Across the business, the Group engages a variety of different suppliers and will engage and manage suppliers in different ways.

All our suppliers must review and ensure compliance with this Code.

## **1.0 Application**

This Code applies to all suppliers of goods and services to the Group, whether local, national or international.

## **2.0 Ingenia's Principles and Expectations**

The purpose of this Code is to outline the Group's principles and clearly communicate the behaviour and business practices we expect our suppliers to adhere to. These practices include meeting social and environmental standards as well as satisfying governance and compliance obligations.

All suppliers must:

- 2.1 Comply with all relevant laws, regulations and standards of the jurisdictions in which the supplier operates. This includes:
  - meeting their contractual obligations to the Group and their own suppliers;
  - complying with laws and regulations on bribery, corruption and prohibited trade and business practices;
  - complying with all applicable laws, regulations and standards including those relating to Workplace Health and Safety and Modern Slavery and in relation to employment practices (including working conditions, wages, benefits and anti-discrimination).
- 2.2 Conduct their business in a way that respects and supports human rights.

Suppliers are expected to promote human rights, to adopt sound labour practices and to provide a safe and healthy work environment with access to development and training.

Suppliers are required to comply with the following standards:

- Ensure there is no forced or bonded labour, and suppliers may not use, or in any way benefit from or contribute to modern slavery;

- Not use child labour and comply with minimum working age laws and requirements;
- Provide fair pay and working conditions, including meeting minimum wage requirements and fair working hours;
- Allow freedom of association and collective bargaining for workers;
- Promote an inclusive workplace free from bullying, harassment, discrimination, and abuse.

## 2.3 Provide a safe work environment

Suppliers are required to provide their employees or contractors with a safe and healthy work environment and must comply with all relevant laws, regulations, codes of practice and standards. We encourage suppliers to proactively manage health and safety risks and support accident prevention through a workplace health and safety policy and management system that is appropriate to the size and nature of their business.

## 2.4 Comply with applicable environmental laws and regulations

Suppliers are encouraged to work towards best practice environmental principles and to understand and minimise their environmental impact. All required environmental permits and registrations must be obtained and maintained.

## 2.5 Conduct their business in a fair, ethical and professional manner

Suppliers are expected to conduct their business ethically, and in accordance with the law. Any breach of relevant laws and regulations must be reported to the Group.

## 2.6 Comply with Privacy and Data Protection Laws

Suppliers must comply with all laws in the collection, use and protection of personal information and must provide immediate notification of any unauthorised access or disclosure of personal information.

## 3.0 Monitoring and Compliance

Ingenia seeks to work proactively with our suppliers and from time to time may carry out assessments to confirm alignment with this Code of Conduct. This may include self-assessment, requesting additional information, use of surveys, questionnaires or on-site visits. Suppliers are expected to cooperate with any request for information and, if required, to work with the Group to address any areas of non-compliance.

While some suppliers may not meet all of our requirements all of the time, we focus on supporting our suppliers' understanding so they can implement the measures to improve their performance. If a supplier is unable or unwilling to meet our minimum standard, we may choose to end the relationship, subject to contractual obligations.

## 4.0 Raising a Concern

Concerns about any potential breach of this Code can be raised confidentially to either of the Ingenia Communities Company Secretary or the Group Risk and Compliance Manager.