

1.0 Policy

Ingenia Communities (Ingenia or the Group) 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 staff may become aware of serious issues within the workplace which have the potential to cause damage to our brand name, reputation, employees, residents, guests, or the public. The purpose of this policy is to provide guidance and protection to whistle blowers by establishing mechanisms by which matters can be raised confidentially and investigated. This policy aims to outline when the escalation of a matter may be appropriate, the process for employees to take if they become aware of reportable issues and the protection afforded to them as a whistle blower. If employees have any concerns about what is proper conduct for themselves or others, they should raise their concerns through the normal channels. This policy is designed to complement the normal communication channels between parties to address questions, concerns, suggestions or complaints.

2.0 Scope

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

3.0 Policy Objective

This policy provides the opportunity for employees to report a concern, including the ability to remain anonymous and to feel safe that they will not be subject to retaliation, victimisation or reprisal. This will enable management to take responsible, appropriate action in case of alleged breaches of internal policy or external regulation or other irregularities, including but not limited to those related to accounting, corporate corruption, misconduct, bribery, fraud, money laundering, tax avoidance and auditing matters.

4.0 What is a Whistle Blower?

The term “whistle blower” is usually used to refer to someone eligible to disclose a serious issue (Reportable Conduct) to management with the power to take corrective action in accordance with this Policy.

For the purposes of this policy, an eligible whistle blower is an Ingenia employee who makes a report using the whistle blower reporting channel.

5.0 What is a Qualifying Disclosure/Reportable Conduct?

Under this Policy a qualifying disclosure of reportable conduct refers to any possible violation by an employee of an internal policy or external regulation, business principles (core values) or any procedure regarding accounting or auditing matters including alleged irregularities of a general, operational or financial nature in the organisation. This includes any conduct that is illegal,

unacceptable or undesirable, or a concealment of such conduct. It does not include personal work-related grievances. Such grievances should be dealt with in accordance with Ingenia Grievance Policy.

You can make a report under this policy if your concern relates to any of the following within Ingenia:

- Questionable accounting, internal accounting controls or audit matters;
- Breaches of tax laws or tax avoidance;
- Contravention of any law administered by ASIC and/or APRA;
- Contravention of Ingenia's business principles (core values) or any other Ingenia policy;
- Intentional communication of incorrect information to public bodies;
- Misconduct, including fraudulent or corrupt behaviour, theft, improper conduct towards colleagues; or
- Intentional suppression, destruction, or manipulation of information regarding, or relating to, any suspicion referred to above.

Examples include, but are not limited to: -

5.1 Fraudulent Behaviour

- Dishonest activity that causes actual or potential financial loss, or an unjust advantage, to Ingenia or any person or organisation, including activity involving customers or third parties where Ingenia's systems and processes are involved. It includes theft of money, data or other property, whether or not deception is involved.
- Deliberate falsification, concealment, destruction or use or intended use of falsified documentation, for a normal business purpose or the improper use of information or position; or
- Knowingly providing or publishing financial records or financial statements that are false or misleading in any way.

5.2 Corrupt Behaviour

- An employee dishonestly acting or dishonestly failing to act, in the performance of functions of his or her employment, or dishonestly taking advantage of his or her employment with the Group to obtain any benefit for himself or herself, Ingenia, or for another person or organisation, or to cause loss to another party/person; or
- Accepting or providing secret commissions or bribes.

5.3 Adverse Behaviour or Misconduct

- Unethical behaviour or misconduct, including breaches of Ingenia's policies, in particular the Code of Conduct policy;
- Other serious improper conduct that may be detrimental to the interests of Ingenia or cause either financial or non-financial loss (including harassment and unsafe work practices); or

- Other behaviour which is contrary to Ingenia's values and/or compliance standards.

5.4 Legal or Regulatory Non-Compliance

Legal or regulatory non-compliance includes illegal behaviour (eg theft, drug sale/use, violence or threatened violence and criminal damage against property) and breaches of all applicable legislation, regulations and laws including ASIC and APRA. This also includes breaches of health and safety and environmental damage.

5.5 Questionable Accounting and Auditing Practices

Questionable accounting includes accounting or auditing practices that:

- May be technically or arguably legal, but do not comply with the intent or spirit of the law;
- Do not comply with accounting or auditing standards;
- Involve an inappropriate or questionable interpretation of accounting or auditing standards;
- Are fraudulent or deceptive in nature.

6.0 Who Should I Raise the Issue With?

Eligible Recipient

In the event you become aware of any issues falling into the above categories you should firstly raise the issue with a member of the Executive Committee. If you feel that this is not an option, or if they have not dealt with the issue adequately, the following avenues are open to you: -

1. Ingenia Communities Reporting Officer

An issue can be reported to the Ingenia Communities Reporting Officer (Group Risk and Compliance Manager). The Reporting Officer will discuss appropriate action internally with the relevant level of management.

2. Ingenia Communities Board

The whistle blower may request to meet with a member of the Board to discuss the issue further.

3. Company Auditor/ASIC

If you feel you are unable to discuss the issue with any of the above-mentioned people you are able to report directly, requesting whistle blower protection to the Company Auditor or ASIC. In the event you do report to either of these external organisations, you must act honestly and have reasonable grounds to suspect that the company or employee has, or may have, contravened the Corporations legislation the ASIC Act, or an offence against any other laws of the Commonwealth that is punishable by imprisonment for a period of at least 12 months.

4. Reports to Third Parties

Employees should raise any Reportable Conduct with the Ingenia in accordance with this Policy at first instance before escalating any Reportable Conduct to any Third Party (excluding instances where you reasonably require professional advice or representation on the matter).

7.0 Role and Responsibilities of Reporting Officers

Ingenia has appointed a dedicated Reporting Officer for the organisation, being the Group Risk and Compliance Manager. The key responsibilities of the Reporting Officer include but are not limited to:

- Supporting management with the proper implementation of the whistle blower policy;
- Receiving whistle blower complaints and performing preliminary investigations;
- Discussing the reported complaints with the appropriate people;
- Communicating with the whistle blower following the guidelines set out in this policy;
- Reporting the results of whistle blower investigations and the settlement of all complaints to the relevant person;
- Ensuring the quarterly compliance reports provide details of the number of whistle blower complaints received and the general nature of the complaints;
- Making this Policy available to all employees including those wishing to make a report; and
- Keeping all records of all activities with respect to whistle blower complaints.

8.0 What Action Will Be Taken?

- A whistle-blower report can only be investigated after referral to the Reporting Officer. Any other person i.e. senior manager who has received the report must refer it to the Reporting Officer as soon as is reasonably practicable and take no further action whilst keeping the matter confidential.
- The issue raised will be fairly investigated and action taken to correct it. Once received the Reporting Officer will perform a preliminary investigation to determine whether the complaint/report is justified. With the whistle blower's approval, the Reporting Officer will discuss the reported complaint with Management, or will turn to the Board if, for example, a member of the Executive Team or the CEO is the object of complaint.
- The whistle blower may report the complaint to the next higher level Reporting Officer (the CEO) if the Reporting Officer is the object of the complaint or if the whistle blower is dissatisfied with the progress and/or the outcome of the investigation.
- If investigation by the Reporting Officer shows no justification for the complaint the Reporting Officer will advise the whistle-blower and management that the complaint be closed.
- The Reporting Officer will keep records of actions taken on whistle blower cases and with approval from the whistle blower will also report progress to the CEO and the Board.

- If the preliminary investigation has revealed serious indications of possible violations of internal or external regulation or other irregularities, the Reporting Officer will immediately, with the approval of the whistle bower, report the complaint to the Board.
- The whistle bower will receive general information on the progress and outcome of the investigation unless they choose not to or if such disclosure would be detrimental to the whistle bower or the investigation.
- If the report involves criminal activity the issue may be reported to the police. If required, the issue will also be reported to the regulator.
- Employees may also have a legal obligation to report certain offences or other matters to government or regulatory authorities. Complying with this policy and reporting any serious issues may not relieve an employee from these legal obligations. In such cases, employees should discuss with the appointed Reporting Officer, Legal Counsel or obtain their own external legal representation regarding any further reporting obligations.

9.0 Whistle Bower Protection

Ingenia senior management will ensure that a whistle bower is able to report a complaint in accordance with this policy without jeopardising their employment. Retaliation or victimisation as a result of a whistle bower report is considered a serious breach of the whistle bower policy in which case appropriate action shall be taken to safeguard the relationship under law of employment of the whistle bower.

Retaliation or reprisal is adverse action taken against a person as a result of raising an issue or complaint in accordance with these procedures. For the purposes of these procedures, retaliation includes (but is not limited to):

- Dismissal or demotion;
- Any form of victimisation, intimidation or harassment;
- Discrimination;
- Current or future bias;
- Action causing injury, loss or damage; or
- Threats (express or implied, conditional or unconditional) to cause detriment, as well as actually causing detriment.

A qualifying protected disclosure is made in accordance with the whistle bower policy, relates to 'reportable conduct' and is made on reasonable grounds. Protection afforded under this policy does not include immunity from liability for any reported misconduct the whistle bower participated in.

10.0 Confidentiality

Whistle blowers will be ensured anonymity (if so requested). If you make a protected disclosure and you do not wish your identity to be revealed, all reasonable measures will be taken to keep it confidential. It is a breach of this policy to disclose a whistle blowers' identity without their consent.

Information provided in confidence via the whistle blower channel remains confidential unless the information is reasonably necessary for the purposes of investigating the conduct or the whistle blower has consented to the information being passed to a third party.

11.0 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 Ingenia intranet. Employees will be advised of the changes and it will be up to each employee to ensure they read and understand them. If an employee is unclear on any details in this policy, they should speak with their Manager, Group Risk and Compliance, or HR. Employees should aim to have a read of this policy every couple of months to refresh their memory.

12.0 Breaches of Policy

All employees are expected to familiarise themselves with the Whistle Blower Policy and ensure that its provisions are observed. A breach of this policy may be regarded as misconduct, which may lead to disciplinary action. In particular any breach of confidentiality of the information provided by a whistle-blower or a whistle-blowers identity, and any retaliation against a whistle-blower, will be taken seriously and if appropriate will be separately investigated.