

1.0 Purpose

Ingenia Communities Group (Ingenia or the Group) is committed to promoting 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 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 to Whistleblowers by documenting the mechanisms by which matters can be raised and investigated confidentially. 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 a reportable issue and the protections afforded to them as a Whistleblower including the ability to remain anonymous in accordance with legislation allowing a Whistleblower to feel safe that they will not be subject to retaliation, victimisation or reprisal.

2.0 Who is an 'Eligible Whistleblower'?

The term 'Whistleblower' is usually used to refer to someone who has reasonable grounds to suspect they have information concerning misconduct¹, or an improper state of affairs or circumstances² and makes a report using the Whistleblower reporting channels. Importantly, a person does not need to identify themselves as a Whistleblower or refer to the policy when making a disclosure.

For the purposes of this policy, an eligible Whistleblower is an employee, director, officer, board member, temporary worker, volunteer or independent contractor. A Whistleblower can also be external to Ingenia and include ex-employees, relatives, spouses and dependents of current and former employees, officers, board members, contractors and suppliers.

3.0 What is a Reportable Conduct?

Under Whistleblower legislation a qualifying disclosure of reportable conduct refers to any possible violation by an employee of an internal policy or external regulation, the Ingenia Code of Conduct or any procedure regarding accounting or auditing matters including alleged irregularities of a general, operational or financial nature. This includes any conduct that is illegal, unacceptable or undesirable, or a concealment of such conduct.

You can report a concern under this Policy if it 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 a regulator.
- Contravention of Ingenia's Code of Conduct or any other Ingenia policy.
- Intentional communication of incorrect information to public bodies.

¹ Section 9 of the Corporations Act 2001 defines misconduct to include 'fraud, negligence, default, breach of trust and breach of duty'

² Corporations Act 2001 does not define 'improper state of affairs or circumstances'

- Misconduct, including fraudulent or corrupt behaviour, theft, improper conduct towards colleagues including bullying, discrimination and harassment (sexual or non-sexual); or
- Intentional suppression, destruction, or manipulation of information regarding, or relating to, any suspicion referred to above.

Examples include, but are not limited to: -

3.1 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.

3.2 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.

3.3 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 unsafe work practices.
- Improper conduct towards colleagues including bullying, discrimination or harassment (sexual and non-sexual); or
- Other behaviour which is contrary to Ingenia's values and/or compliance standards.

3.4 Legal or Regulatory Non-Compliance

Legal or regulatory non-compliance includes illegal behaviour (e.g., 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.

3.5 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; or
- Are fraudulent or deceptive in nature.

4.0 What is not classed as Reportable Conduct

Personal work-related grievances are generally not classified as Reportable Conduct. These are grievances relating to your employment for example remuneration, promotion or disciplinary action.

The disclosure of a personal, work-related grievance is not protected by this Policy or the Whistleblower protections in the Corporations Act 2001 (Cth). Such grievances should be dealt with in accordance with Ingenia Grievance Policy.

Occasionally, personal work-related grievances may amount to Reportable Conduct under this policy if, for example, they:

- Indicate a systemic issue; or
- Relate to actual or threatened Detrimental Conduct against a person because they have disclosed or are believed or suspected to have disclosed, or be planning to disclose, other Reportable Conduct.

5.0 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. Core Integrity - External provider of the Ingenia Speak Up Integrity Hotline

Channel	Details
Web & Online	qrs.ly/IngeniaWBHotline 

Email	speakup@coreintegrity.com.au
Phone	1800 324 775
Mail	Speak Up P.O. Box 895, Darlinghurst, NSW, 1300

2. Ingenia Communities Whistleblower Protection Officer

An issue can be reported to the Ingenia Communities Protection Officer (GM People and Culture). The Protection Officer will discuss appropriate action internally with the relevant level of management, keeping the complainant details anonymous if the complainant wishes

3. Ingenia Communities Board

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

4. 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 Whistleblower protection to the Company Auditor or ASIC.

Reports to Third Parties

While it is Ingenia's preference that you first raise any reportable conduct with an internal representative, Ingenia understands that is not always possible. It is important to note that under the Corporations Act you may also raise the matter with an external third party other than a Company Auditor or ASIC, this includes the Australian Federal Police, Commission of Taxation, Member of Parliament or in specific circumstances a journalist (this excludes instances where you reasonably require professional advice or representation on the matter).

6.0 Role and Responsibilities of Whistleblower Protection Officer and the Whistleblower Investigation Officer

Ingenia has appointed both a dedicated Protection Officer (GM People and Culture) and a dedicated Investigation Officer (Group Risk and Compliance Manager) for the organisation.

The key responsibilities of the Protection Officer include but are not limited to:

- Receiving Whistleblower complaints and performing preliminary investigations.
- Communicating with the Whistleblower following the guidelines set out in this policy.
- Assisting the Whistleblower with maintaining their wellbeing during the investigation including referring them to counselling and/or other professional services as appropriate.
- Reporting the results of Whistleblower investigations and the settlement of all complaints to the Whistleblower; and
- Making this Policy available to all employees including those wishing to make a report

The key responsibilities of the Investigation Officer include but are not limited to:

- Supporting Management with the proper implementation of the Whistleblower policy.
- Discussing the reported disclosure with the appropriate people.
- Investigation of the disclosure.
- Ensuring the quarterly compliance reports provide details of the number of Whistleblower complaints received and the general nature of the complaints.
- Keeping all records of all activities with respect to the Whistleblower complaints.

7.0 What will happen once a report is made?

- The Protection Officer will, where possible, acknowledge receipt of the report (A whistleblower report can only be investigated after referral to the Protection Officer and/or Investigation Officer for preliminary assessment). Any other person i.e. a member of the Executive Committee who has received the report must refer it to the Protection Officer as soon as is reasonably practicable for assessment and take no further action whilst keeping the matter confidential and the Whistleblower's details, including information that may lead to their identity being known, anonymous, if consent has not been provided by the Whistleblower to pass on information relating to their identity.
- The Whistleblower may report the complaint to the next higher level Protection Officer (*to be decided*) if the Protection Officer is the object of the complaint or if the Whistleblower is dissatisfied with the progress and/or the outcome of the investigation.
- The Protection Officer will carry out a preliminary assessment of the disclosure to understand whether the reporter is an 'Eligible Whistleblower' and the matter is considered 'Reportable Conduct'. If the disclosure is assessed as a 'Whistleblower Report', it will then be referred to the Investigation Officer.
- The Investigation Officer will review the disclosure and if appropriate begin the investigation.
- With the Whistleblower's approval, the Investigation 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 Investigation Officer will conduct or commission the investigation with the support of internal or external resources as appropriate (the investigation will follow an unbiased and fair process and it will be conducted as quickly as possible).
- The Whistleblower will receive general information on the progress and outcome of the investigation unless they choose not to, they have not provided any contact details or if such disclosure would be detrimental to the Whistleblower or the investigation.
- If the preliminary investigation has revealed serious indications of possible violations of internal or external regulation or other irregularities, the Investigation Officer will immediately, with the approval of the Whistleblower, report the complaint to the CEO and the Board.
- Once the investigation is complete, the Investigation Officer will issue a report on the finding and the evidence to which the findings are based.

- Dependant on the circumstances of the disclosure and any privacy concerns, the Investigation Officer will inform the Whistleblower of the outcome (a report does not need to be issued to the Whistleblower).
- 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 Protection Officer, Legal Counsel or obtain their own external legal representation regarding any further reporting obligations.
- The Investigation Officer will keep records of all actions taken and at the completion of the investigation. The Investigation Officer will provide a report on the outcome of the disclosure to the Audit and Risk Committee.
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8.0 Whistleblower Protection

All Whistleblower disclosures will be handled in accordance with this Policy and the applicable Whistleblower legislation. Any form of actual or threatened retaliation or victimisation as a result of a Whistleblower report is considered a serious breach of this Policy and the Corporations Act and will not be tolerated.

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 or bullying.
- 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 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 Whistleblower participated in.

9.0 Confidentiality

Whistleblowers will be ensured anonymity (if so requested). If you make a protected disclosure and you do not wish your identity to be revealed, all measures will be taken to keep it confidential. It is a breach of this Policy to disclose a Whistleblowers' identity, or information which may lead to their identity without their consent.

Information provided in confidence via the Ingenia Speak Up Integrity Hotline remains confidential unless the information is reasonably necessary for the purposes of investigating the conduct or the Whistleblower has consented to the information being passed to a third party.

10.0 Document Implementation and Review

Ingenia will make this Policy available to its officers and employees via the Ingenia Communities intranet. Employees will be advised of any changes to this Policy at which time each employee should refresh their understanding of what is contained within the Policy.

Further details regarding the Policy can be obtained from your direct manager, a member of the Executive Committee or the Protection Officer or Investigation Officer.

This Policy will be reviewed annually to ensure it remains effective and compliant with applicable legislative requirements.

11.0 Breaches of Policy

All employees are expected to familiarise themselves with the Whistleblower 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 Whistleblower or a Whistleblower's identity, and any retaliation against a Whistleblower, will not be tolerated and if appropriate will be separately investigated.

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

Policy History

<i>Established:</i>	<i>June 2012</i>
<i>Last review & approved:</i>	<i>June 2022</i>
<i>Review frequency:</i>	<i>Annual</i>