



Ingenia



Modern Slavery
Statement
2023



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Acknowledgement of Country



As an owner, operator and developer of real estate across Australia, Ingenia Communities acknowledges the traditional custodians of the lands on which we operate.

We recognise their ongoing connection to land, waters and community, and pay our respects to First Nations Elders past, present and emerging.

A message from the CEO

Simon Owen

At Ingenia, we seek to do business with ethically and socially responsible suppliers and to partner with them in a way that is consistent with the Group's values, purpose and strategy.



I am pleased to present the Group's fourth Modern Slavery Statement, which outlines the principles and approach we have adopted in dealing with the risk of modern slavery and the protection of human rights across our business and how we continue to build on our efforts in this important area.

While we seek to ensure we have strong corporate, ethical and engagement practices in place, we recognise that through our supply chain, we may still be exposed to the risk of modern slavery.

Recognising the diverse nature of our business across different sectors and the regional location of our communities, we proactively seek to engage and support local businesses and to do so in a way that addresses the risk associated with modern slavery and other abuses of human rights. As we have increased in scale the diversity of our suppliers has increased, and we have sought to ensure that our practices and approach reflect this.

This year we continued to review our current approach and further evolved our practices, with a focus on our procurement activities. We have moved further towards centralised procurement which will allow additional control when appointing and managing suppliers. We also made significant progress in engaging our teams and building their knowledge and understanding of the risk of modern slavery and our processes in response to this risk.

During FY24 we will continue to work to further refine the Group's framework, implement additional processes and enhance our reporting and transparency. We remain committed to working with our business partners and suppliers to ensure they meet our expectations and collaborating with them to safeguard employees, customers and suppliers within our sphere of influence.

Approval of statement

This Statement was prepared in consultation with the Boards of the reporting entities covered under this Statement and was subsequently approved by the Board of Directors of Ingenia Communities RE Limited on behalf of the listed reporting entities on 5 December 2023 and signed by:

Simon Owen
Chief Executive Officer,
Ingenia Communities Group

Dated: 5 December 2023

Introduction

This Statement has been prepared pursuant to section 14 (1) of the Modern Slavery Act 2018 (Cth) (the Act) by Ingenia Communities Group (Ingenia or Group).

The Group comprises Ingenia Communities Holdings Ltd, Ingenia Communities RE Ltd, Sungenia (a development Joint Venture between Sun Communities and Ingenia) and Eighth Gate (Fund management platform) and sets out the actions taken by the Group to address modern slavery risks in our business and supply chain over the financial year 1 July 2022 to 30 June 2023.

The International Labour Organization (ILO) acknowledges that some sectors are more exposed to the issue of forced labour and human trafficking, including sourcing goods and services from abroad, which is relevant to Ingenia. Respect for human rights is a high priority for Ingenia. In accordance with the Act, this Statement sets out the Group's approach during FY23 to ensure that our business actively identifies, manages, and mitigates the risk of modern slavery in our operation and supply chain.

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.

Modern Slavery Act Mandatory Reporting Criteria

Modern Slavery Act Mandatory Reporting Criteria		Reference
Criteria 1	Identify the reporting entity.	Pages 4-5
Criteria 2	Describe its structure, operations, and supply chain	Pages 6-10
Criteria 3	Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and entities it owns or controls	Pages 11-14
Criteria 4	Describe the actions taken by the reporting entity and any entities that it owns or controls to assess and address these risks, including due diligence and remediation processes	Pages 14-21
Criteria 5	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Page 22
Criteria 6	Describe the process of consultation with any entities the reporting entity owns or controls	Pages 22-23
Criteria 7	Any other relevant information	Pages 24-25

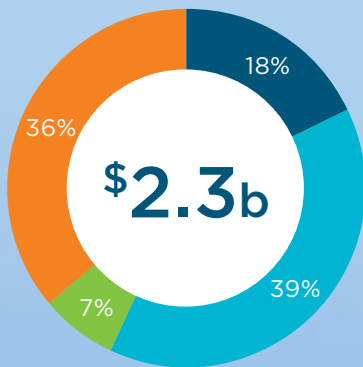


About Us

Ingenia Communities Group (ASX: INA) is a leading operator, owner and developer offering quality residential communities and holiday accommodation. Listed on the Australian Securities Exchange, the Group is included in the S&P/ASX 200. Across Ingenia Lifestyle, Ingenia Gardens, Ingenia Holidays and Ingenia Rental, the Group's \$2.3 billion property portfolio includes 107¹ communities and development sites wholly within Australia (at 30 June 2023).

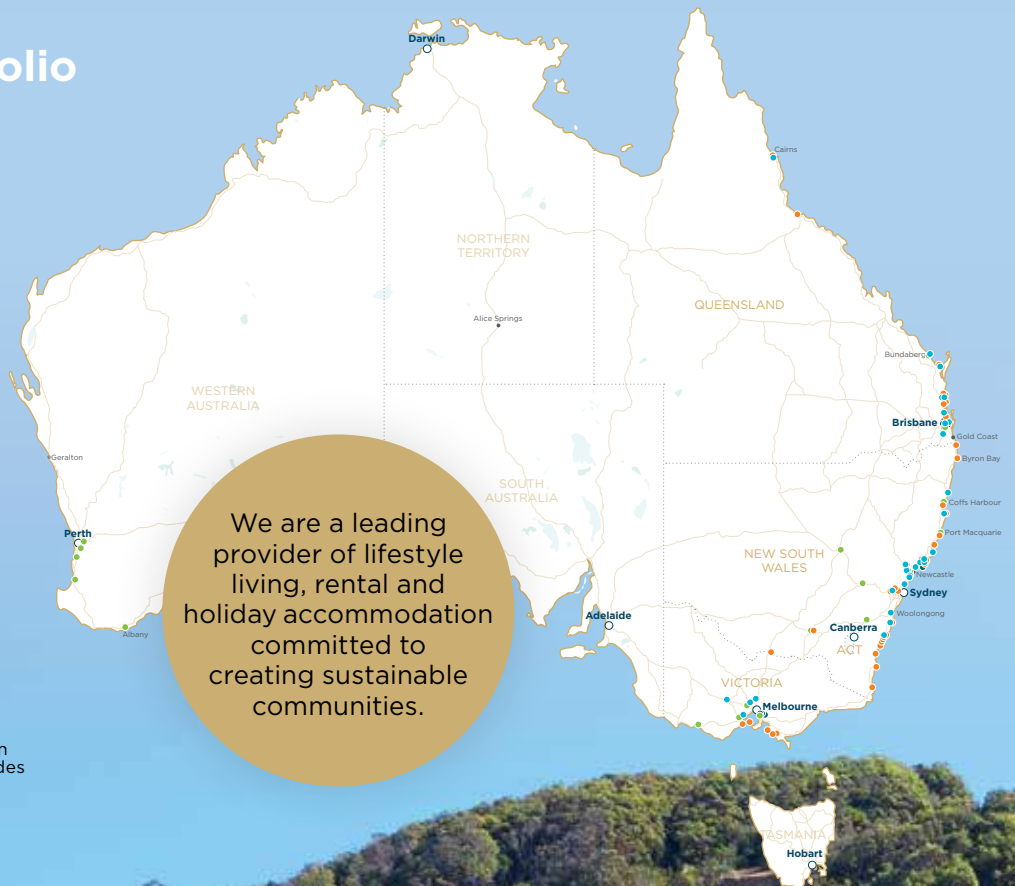


Property Portfolio (by value)¹



- Lifestyle Development
- Lifestyle Rental
- Ingenia Gardens
- Ingenia Holidays

Property portfolio includes assets managed by Ingenia and acquisition announced and yet to settle. Excludes assets held for sale.



We are a leading provider of lifestyle living, rental and holiday accommodation committed to creating sustainable communities.

~1,300
EMPLOYEES
(80% based in regional locations)

~10,000
HOMES
No. of homes/sites²

>4,000
INVESTORS

¹ As of 30 June 2023.

² Includes established communities, the Joint Venture, managed funds and home sites in Mixed-Use communities.

Our Commitment to Human Rights

Ingenia Communities, through our Board, Executive and employees, is committed to conducting all our business affairs in a way that is legal, ethical and socially responsible with strict observance of the highest standards of integrity, respect and propriety. This includes considering the dignity, wellbeing and human rights of employees, contractors, residents and all others involved in and around our communities.

Our approach to human rights is rooted in proactive prevention, as we actively identify, assess, and mitigate potential human rights risks throughout our portfolio. Our commitment extends to upholding ethical sourcing practices, ensuring fair treatment of employees, engaging with local communities, and encouraging diversity and inclusion.

We seek to do business with ethically and socially responsible suppliers and to partner with them in a way that is consistent with the Group's values, purpose and strategy.



The Group's vision and values are reflected in our commitment to human rights.

We display this commitment publicly in our Sustainability Report, our Policies and our Modern Slavery Statements which provide a high degree of transparency as we evolve our approach, report on our progress and identify opportunities for future improvement.



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Our Structure

Ingenia Communities Group is a triple stapled entity, which is listed on the Australian Securities Exchange. The Group includes controlled entities, including funds and trusts.

Ingenia has corporate offices in Sydney and Brisbane, but the Group's operations are diverse and largely regional, with a footprint that spans 107 assets, predominately on the East Coast of Australia.

Ingenia's Board has overarching oversight of the Group's Modern Slavery response. As shown below the Group's focus on preventing any form of modern slavery is reflected at all levels of the Group.

INGENIA BOARD

Determines and oversees the strategic direction of Ingenia including matters relating to ESG. The Board is responsible for approval of the Modern Slavery strategy and annual Statement.

AUDIT, RISK AND SUSTAINABILITY COMMITTEE (ARSC)

Oversight of the Group's financial reporting, risk function, ESG and compliance obligations. The ARSC is responsible for review and recommendation to the Board of the annual Modern Slavery Statement.

CEO AND LEADERSHIP TEAM

(including - GM Investor Relations & Sustainability)

Development of the strategic direction of the Group as well as day-to-day functioning of Ingenia activities whilst operating within the risk appetite and Vision and Values of Ingenia.

GROUP RISK MANAGEMENT COMMITTEE

Executive oversight of the Group's financial service risk, financial services compliance obligation and insurances

OPERATIONAL RISK MANAGEMENT COMMITTEE

Executive oversight of the operational business risk

These committees hold joint responsibility for the risk culture and risk framework at Ingenia

INTERNAL ESG COMMITTEE

Responsible for overseeing and assisting with the implementation of the Group's ESG initiatives including Modern Slavery.

These initiatives include efforts to reduce Ingenia's environmental impact, improve our social and ethical practices and strengthen our governance structures.

Group Risk and Compliance Manager

Oversight and continued enhancement of the Group's risk and compliance framework to meet its legal and regulatory obligations including responsibilities relating to Modern Slavery.

Investment

Operations

Fund Management

Sales

Development

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Our Operations

Ingenia’s diverse asset base includes residential and holiday park assets which provide a range of accommodation options. In addition to owning, managing and developing assets Ingenia co-invests and operates assets owned through the Group’s Managed Funds and through a Joint Venture with Sun Communities.

Ingenia Communities’ core operations include:

-  **Operating the physical assets, being the real property of the park or community and the fixed assets that require ongoing ground services and repair and maintenance**
-  **Holiday Park operations and services for guests including provision of accommodation, recreational activities and some food and beverage services**
-  **Ingenia Connect, a free service that promotes engagement and independence of our residents to improve their health and wellbeing**
-  **The acquisition of land and associated facilities for the development of quality, sustainable communities**
-  **Sales, marketing, and other head office functions including finance, IT, administration and human resources**
-  **Fund management operations**
-  **Development of land lease communities, including installation and construction of new homes, roads and supporting infrastructure and facilities**

Our Workforce

With around 1,300 employees across multiple locations at Ingenia, we acknowledge our team’s important contribution to our success.

We embrace and value all employee differences including gender, age, culture, ability, and lifestyle choices and support all employees in realising their potential and pursuing their career goals.

Reflecting the Group’s operating focus and asset base, a significant portion of the Group’s employee base is employed under a formal Award, with 82% of the Group’s ~ 1300 employees employed under either the Aged Care Award or the Hospitality Industry General Award. Ingenia does not have any collective agreements as all employees are employed under individual contracts which comply with the National Employment Standards (NES) or are covered by an Award.

The Group is a sector leader in gender diversity with a high level of female representation at all levels of the Group.

2023 CEW Executive Census



#1 for women in executive leadership positions across the real estate sector

Our recent employee survey provided additional insight into our organisational diversity, for the first time giving us an appreciation of our employees’ backgrounds and the diverse perspectives they represent.

Further information on the Group’s workforce can be found in the 2023 Sustainability Report.

All employees are required to complete annual training on Modern Slavery and Modern Slavery training is a core component of the onboarding process for new employees.

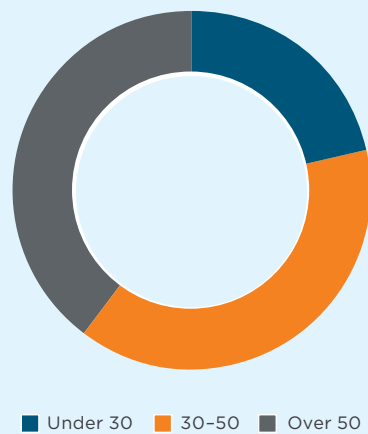
The Group aims to continually raise awareness and educate all employees to not only ensure they have a clear understanding of their own rights but also ensure key staff within our parks and communities are alert to the potential risk and escalate any suspicious occurrences accordingly.

In FY23, 69% of employees undertook Modern Slavery training.

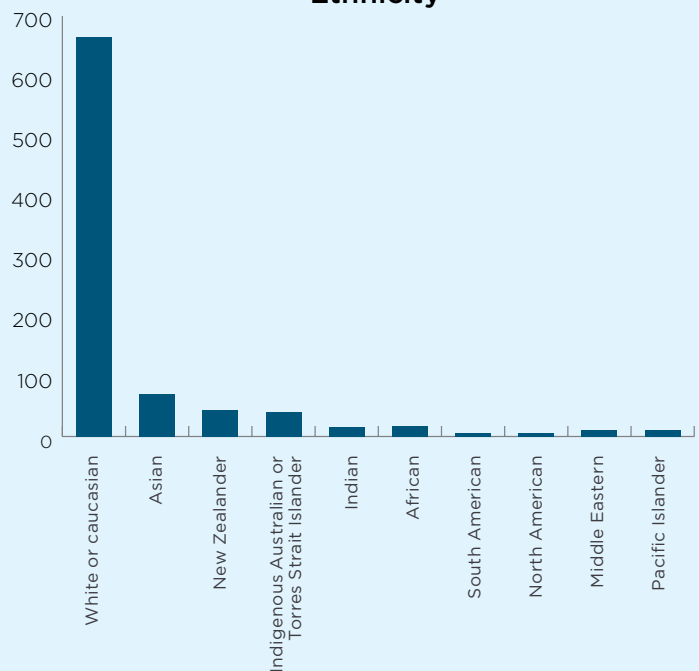
Employees by Gender



Employees by Age



Ethnicity



*780 employees participated in the survey for this question and were able to select multiple options.

Our Supply Chain

Ingenia seeks to do business with suppliers that have similar values, and ethically and socially responsible business practices, including those related to human rights. Our aim is to ensure that human rights are understood, respected and upheld by all of our suppliers in all locations.

Recognising the diverse nature of the business and the regional locations of our communities and parks, we proactively seek to engage and support local businesses and we do so in a way that seeks to limit the risks associated with modern slavery and other abuses of human rights.

Our suppliers are from a range of sectors, including information technology, property services, construction, catering, food and beverage. Most goods and services procured for our business are sourced from and provided by businesses located in Australia. Other than prefabricated buildings or building materials, 'goods' procured are typically consumable items that are incidental to our core business.

Where Ingenia does provide prefabricated cabins or homes for residents or rental accommodation, these are sourced from domestic suppliers. The nature and scale of constructing prefabricated homes requires streamlined manufacturing processes to achieve economies of scale, including the use of a combination of contemporary automated and/or robotic equipment along with some manual labour.

As a holiday and residential community operator, the majority of procurement activity is service-based and covers areas such as information technology, grounds and maintenance, housekeeping, pool and facility cleaning, home and cabin maintenance, local development and construction, electrical, plumbing and garbage removal.


Overview of suppliers

As the Group's business has evolved so has Ingenia's supply chain, with enhanced business scale and evolving procurement practices contributing to an increase in total spend, a change in supplier profile and an increase in the average annual spend across the Group. We retain a large number of suppliers who are providing goods or services at asset level through either ongoing or one-off purchases, however, have increased our expenditure with core large-scale suppliers.

Over FY23, suppliers totalled 2,859, with a procurement spend of \$414 million, generating an average spend of \$145,000. This compared to 2,706 suppliers in FY22 with a total spend of \$294 million, generating an average spend of \$108,647.

In addition, in FY23:

- The **top 25 suppliers** accounted for **56% of total spend**
- The **top 100 suppliers** accounted for **75% of total spend**
- The **bottom 1,000 suppliers** accounted for **less than 0.5% of total spend**.



2,859
Total number of suppliers



\$414m
Total procurement spend



\$145k
Average annual spend per supplier

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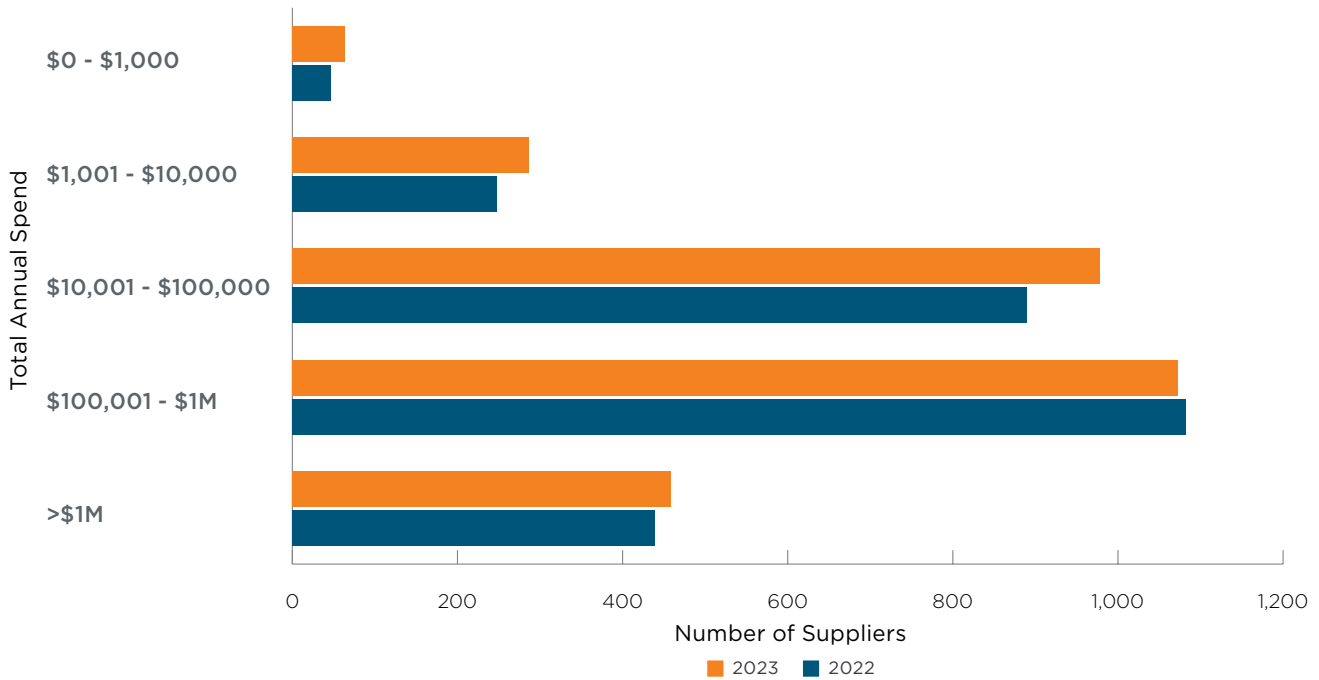
Supply Chain Spend

We have seen the average spend per supplier increase as we have continued to centralise procurement decisions across our asset base and to scale our activities, allowing greater visibility and potential to engage with and influence our supply chain. We engage many of our suppliers across multiple business segments and procurement categories.

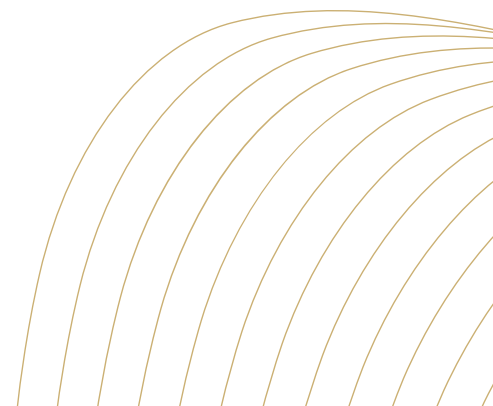
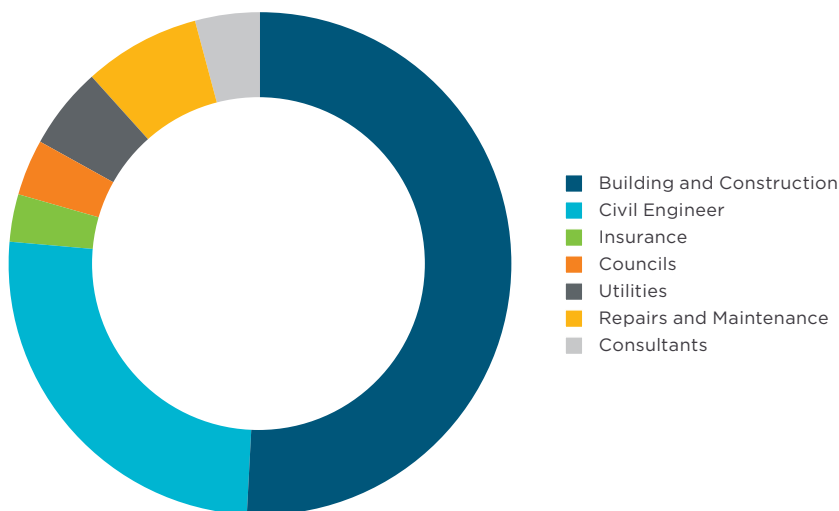
- **Corporate** – suppliers providing a range of services including professional services, communications and technology, human resources, marketing, office supplies and insurance
- **Development** – suppliers including civil contractors, home and community facilities construction, planning and building consultants, marketing
- **Operations** (holidays and residential communities) – suppliers used in the day-to-day activities required for management of our communities, including marketing.

Further information about the profile of the Group’s supplier base is shown in the charts below which shows the small decrease in lower spending due to initial changes in our procurement process. The section on Risk Management and Due Diligence (page 15) describes the Group’s approach to risk assessment and mitigation across the supply chain.

Total Suppliers and Overall Spend



FY23 Key Supplier Categories (% of total spend.)



Understanding our Modern Slavery Risks

As a leading operator of residential communities and holiday accommodation, Ingenia offers innovative products and affordable housing options (typically for over 55's) in the form of locally constructed homes as well as mobile prefabricated buildings (cabins or homes) in our communities.

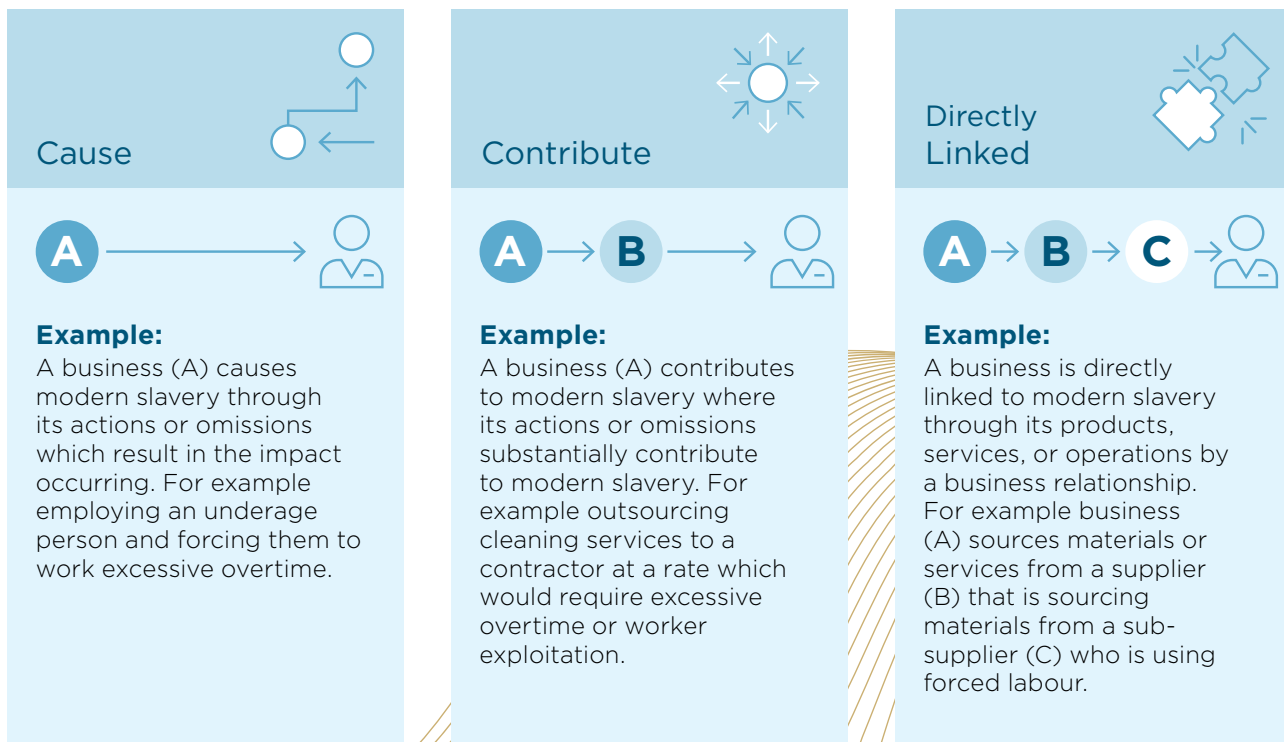
Our holiday parks accommodation typically comprises a combination of locally manufactured homes, and caravan and camping sites. We operate more than 100 parks and communities across Australia, with the vast majority of those located on the east coast.

In accordance with the United Nations Guiding Principles (UNGP), Ingenia is committed to identifying, assessing and taking action to mitigate any potential modern slavery risks in its operations and supply chain.

The UNGP advise that businesses can be at risk via the 'Continuum (or scale) of Involvement', see table below.

The Continuum or Scale of Involvement

Ingenia recognises we will not usually be directly exposed (Cause) to the possibility of modern slavery due to the structure of our operations but could be impacted indirectly (Contribute) through third party contractors and indirectly (Directly Linked) throughout our supply chain to the risk of modern slavery with the supply of goods and services procured from third parties.



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Understanding our Modern Slavery Risks

Ingenia recognises we will not usually be directly exposed (Cause) to the possibility of modern slavery due to the structure of our operations but could be impacted indirectly through third party contractors (Contribute) and throughout our supply chain (Directly Linked) to the risk of modern slavery with the supply of goods and services procured from third parties.

The Group has identified actions to be taken in each of the above instances, to ensure that where modern slavery is identified there are clear processes in place.

CAUSE

The Group's operations directly result in some form of modern slavery.

Ingenia action:

Workplace laws and internal hiring practices, payment and working conditions would generally prevent Ingenia from being the cause of modern slavery in its day-to-day business activities.

CONTRIBUTE

The Group's operations or actions in its supply chain may contribute to modern slavery, including through acts or omissions that facilitate or incentivise slavery.

Ingenia action:

Once this is understood through our due diligence, Ingenia would suspend the use of a supplier who may be involved in activities which would allow any form of slavery. The actions would be dependant on the criticality of the relationship and any consequences as a result of termination of a contract.

DIRECTLY LINKED

The Group's operations, products or services may be connected to modern slavery through activities of another entity it has a business relationship with.

Ingenia action:

Once this is determined, Ingenia would take appropriate action to distance itself dependant on the criticality of the relationship and any consequences as a result of termination of a contract.

* CAUSE, CONTRIBUTE and DIRECTLY LINKED are referenced from the United Nations Global Network Australia.

Risks in our Operations

As a property and financial services organisation based in Australia, Ingenia has considered the risk that may result in it causing, contributing to, or being directly linked to modern slavery within its direct business operations and workforce to be low, working strictly within all applicable laws and regulations within each jurisdiction.

- 82% of our workforce is covered by an Award or under an Enterprise Bargaining Agreement
- The Group has various policies and procedures that contribute to a safe and fair working environment with the ability to lodge an anonymous grievance if necessary (further details are available later in the Statement under Communicating our Human Rights Expectations).

For further details on our workforce composition refer to our 2023 Sustainability Report.



In FY23 the modern slavery risks in our direct operations remained comparatively low and no instances of modern slavery have been identified during the period.



82%

of our workforce is covered by an Award or under an Enterprise Bargaining Agreement



Risk in our Supply Chain

Ingenia relies on a substantial supply chain to execute its business activities. During FY23, we have continued to enhance internal capacity and knowledge and relationships with our suppliers. In addition to ongoing improvement of our current approach, we continue to maintain and progress a robust responsible sourcing framework to help the business better identify and respond to modern slavery risks across our supply chain.

The Group uses the construction and home building industry to assist in the design and construction of its communities. As this industry is considered high risk for modern slavery Ingenia continues to be focused and committed to understanding where the risks exist in dealing with this industry sector.

Ongoing work continues to confirm our view that the key areas of concern for modern slavery within the Group are in the 'contribute' space, these include but are not limited to:

- Forced labour/debt bondage (i.e. labour or services are provided as security or repayment of an inflated debt)
- Freedom of Association (including the right to form and join a trade union).

We also recognise other areas that may not directly impact us but may be occurring i.e. 'directly linked' to our supply chain without our knowledge:

- Forced marriage
- Sexual exploitation
- Child exploitation or labour
- Human trafficking (including trafficking in children).

Recognising that changes in our business mix and supply chain have the potential to change the exposure to modern slavery risk, and that these changes can be internally or externally driven, we continue to focus on our supply chain to identify and manage emerging risks.

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Our Actions to Assess and Address Our Modern Slavery Risks

Over FY23 we continued to evolve our modern slavery approach, with a core focus on:



Enhancing governance and reporting



Engaging widely to finalise and implement a responsible sourcing framework



Enhancing data collection



Issuing supplier questionnaires



Educating our teams on related risks and response procedures

More detail on our framework for addressing modern slavery and our specific actions are outlined below.

Governance

Ingenia does not tolerate slavery, human trafficking, forced or child labour or child exploitation of any kind and uses the same governance structure to manage its environmental, social, and governance (ESG) risks and opportunities.

The ultimate responsibility for the oversight of governance of the Group rests with the Board. This includes responsibility for Ingenia's Modern Slavery risk management.

The Board has delegated operational responsibility to its sub-committee (ARSC) and management and to ensure a consistent approach towards modern slavery responsibilities Ingenia established a cross functional Environmental, Social and Governance (ESG) Committee. The Committee is comprised of key executives from Ingenia, Sungenia and Eighth Gate and oversees and directs activities across the business. This includes continuous improvement, ongoing awareness, transparency and accountability and supply chain evaluation and management.

Day-to-day responsibilities for the implementation of these measures is monitored by Risk and Compliance in conjunction with the ESG team and the business.

Policy Framework

Our policies support our commitment to respect human rights and support a safe and fair working environment for our people and those working within our communities. Our policies also outline our expectations for our people and suppliers working with the Group. The key policies relevant to modern slavery are set out in the section on Communicating our Human Rights Expectations on page 19. For a full list of all policies, refer to the Corporate Governance section of the Group's website.

Risk Management and Due Diligence

As a result of our engagement with external human rights subject matter experts Edge Environment, we were able to continue to refine our Modern Slavery framework in relation to our suppliers. This work allowed us to formalise our process of supplier assessment and continue to evolve our policies and education in relation to modern slavery through the creation of a responsible sourcing framework.

Over FY23 we broadened our understanding of our supplier base (through direct contact and select rollout of our first Supplier Questionnaire), rolled out our Modern Slavery Responsible Sourcing Framework and enhanced employee training and engagement.

During FY23 the Group's supplier base increased to 2,859 suppliers but spend remained heavily concentrated with the top 100 suppliers.

During FY23 processes have been put in place to allow us to discuss, assess and analyse our supply chain and identify ongoing actions that may be required. In addressing these potential risks, Ingenia employs a robust risk management and due diligence process as outlined below.

Our approach to detecting risk in our supply chain is based on our knowledge of and relationships with our suppliers, the geographic location of suppliers, the origin of the goods or services, the types of goods and services and also our ability to influence or educate suppliers on their moral and ethical responsibilities with regard to human rights and potential modern slavery situations.

The following actions were taken or continued from previous years to help mitigate the risks associated with engaging with supplier(s):

- Continue to roll out and monitor our Supplier Code of Conduct which requires all new suppliers to declare they will comply with all applicable laws and regulations relating to the Modern Slavery Act.
- Ongoing inclusion of Modern Slavery and Human Rights as a permanent agenda item for the ESG Committee
- Process for pre-qualification of large spend suppliers endorsed by Executive and Board
- Regular updates to the ARSC and Ingenia Communities Board
- Ongoing review and assessment of the Group's supply chain risks and opportunities, including identifying categories or individual suppliers with whom there may be a heightened risk
- Continual review of policies and procedures associated with employee behaviour and standards, anti-corruption and bribery measures, and processes for engaging and validating suppliers
- Initial rollout of the Supplier Questionnaire to a sample of suppliers
- Annual training for all new and existing team members.

The Group aims to continually raise awareness and educate all employees to not only ensure they have a clear understanding of their own rights but also ensure key staff within our parks and communities are alert to the potential risk and escalate any suspicious occurrences accordingly. This training is complemented by the Whistleblower Policy and increased visibility of our Speak Up hotline, see page 21 for more detail.

**Top 100 suppliers
accounted for**

75%

of total spend

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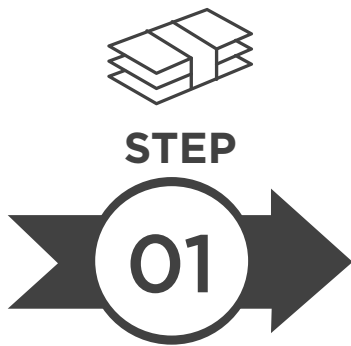
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Risk Management and Due Diligence

Over FY23 we undertook a review of over 100 suppliers. Our assessment of suppliers is based firstly on understanding risk using the criteria shown below:



How much are you spending?

Modern Slavery can occur in high and low spend categories, higher spend may increase your influence on supplier practices.



What are you buying?

Different products and categories of spend have different risks based on the workforce profile and country of origin.



How big is the opportunity?

Consider the impact and leverage Ingenia may have based on whether a contract exists and where vulnerability sits with the tiers of the supply chain.

Suppliers are then assessed based on more detailed criteria (shown in Table 1) which allowed us to prioritise our suppliers into four categories, identifying the suppliers which represent the greatest priority with respect to the risk of modern slavery. The outcome of this assessment is shown in Table 2.

Modern Slavery Risk Matrix

Country Weak labour regulations eg minimum wage, collective bargaining agreements Poor track records on corruption and human rights Prevalence of criminal organisations	Countries listed as high risk on the Global Slavery Index (GSI)	E					
	Australian supplier with manufacturing in a high risk GSI country	D					
	Overseas supplier in a non GSI country	C					
	Australian supplier with overseas manufacturing	B					
	Australian supplier with local manufacturing	A					
			1	2	3	4	5
Industry Vulnerable workforce eg low skilled, temporary jobs, poverty, high movement of migrants Long and complex supply chains Labour intensive industry	Low risk industry i.e. local government, councils, small corporate, consultants, Ingenia entities	Low risk industry i.e. large local corporates, external service providers (IT and Registry)	Medium risk industry due to unidentified 2nd and 3rd tier suppliers	High risk of modern slavery i.e. building & construction, food & beverage suppliers, office supplies etc	Very high risk of modern slavery i.e. contract cleaners, security services, IT equipment		

Table 1: Detailed risk assessment criteria.

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Risk Assessment

Our due diligence process and risk assessment evolved over the year. This includes our Modern Slavery Responsible Sourcing Framework, engagement with staff responsible for large supplier spend, training of staff across the Group, the initial application of a pre-qualification process (as most suppliers were already in place) and application of our risk matrix and Supplier Questionnaire.

Our Supplier Code of Conduct is a key element of our engagement with suppliers, as it includes requirements relating to human rights and modern slavery. We seek, where possible, to partner with suppliers who recognise and uphold these requirements and our risk assessment may dictate that we choose not to work with or replace suppliers who do not meet our requirements.

Consistent with further development of our risk approach as outlined above, in FY23 a risk assessment of the top 100 suppliers categorised by spend was undertaken which allowed us to better understand the Group's risks. These suppliers represented approximately 75% of the Group's overall spend in FY23. The risk assessment allowed us to identify specific categories of spend in accordance with the product being purchased and our ability to influence the supplier.

The outcome of this assessment, which ranks our top 100 suppliers (excluding Ingenia entities) from Priority 1 to Priority 4, is shown below:

Group	Annual Spend %	No. Suppliers	Risk Rating	Examples
Priority 1	32.48%	17	High risk, high spend, limited ability to influence	Construction and home building contracts, large landscaping contracts,
Priority 2	4.23%	12	High risk, low spend, some ability to influence	Cleaning and security contracts, IT equipment (e.g. computers and phones) marketing goods (e.g. promotional material), catering, uniforms
Priority 3	26.22%	36	Low risk, high spend, high ability to influence (influence may be dependant on size of supplier)	Local family run builders and landscapers, civil engineering contracts
Priority 4	11.96%	28	Low risk, low spend, varied ability to influence	Most other suppliers, including utilities and government and statutory costs

Table 2: Priority Spend.

As a result of the risk assessment, we were able to prioritise our focus and refine our Supplier Questionnaire which was initially sent to a small number of key suppliers to test the process. These suppliers ranged from high to low risk and included annual expenditure ranging from \$6,000 to \$1.5 million. We received a positive response from 60% of the suppliers who were invited to complete the questionnaire.

We intend to continue to expand on this process for our Supplier Questionnaire and distribute it to a larger range of priority 1 suppliers next year.

Risk assessments, gap analysis, workshops and continuing framework development including Supplier Code of Conduct, Supplier Questionnaire and grievance mechanisms/implementation will all be further progressed over FY24.

The ongoing management of our supply chain will continue to be integrated into existing business systems and processes to ensure the residual risk of modern slavery is monitored by key executives.

Risk Management and Due Diligence

Operations

The majority of the Ingenia workforce are employed directly, and therefore we consider the risk of modern slavery in our operations to be relatively low.

Over 70% of our recruitment is undertaken by our in-house team and a large portion of our employees are employed under an award which dictates clear employment conditions including hours and pay. By recruiting and managing our team internally we maintain a focus on our values and have control over the protections and conditions of our team.

To ensure that we maintain a focus on our operational assets and remain alert to potential modern slavery risks, the Executive General Manager Tourism and Executive General Manager Residential Communities and their direct reports, are responsible for reviewing domestic contractor service arrangements. Regular visits to our communities are carried out as part of this process. Reviews conducted to date have shown that all contractors used by our parks are typically a combination of small family run businesses or sole traders. When contractors are required, they are all paid award or above award rates. There are no known instances or reports of any forms of exploitation, forced labour or any other Modern Slavery practices within our contractor base.

Supply Chain - Development

The Development Team at Ingenia, who manage most of the large spend contracts where the potential risks have been identified within the Group's supply chain, continue to work on embedding procedures rolled out in line with the Group's Responsible Sourcing Framework. Additional training, specific to the risks within development activities, will be rolled out during FY24.

Also planned for FY24 is a review of all new and existing development contracts. This will allow the team to understand and address any residual gaps. The review will also take into consideration, supply chain and product risk in all future development procurement and design decisions.

Senior members of the development team are regularly onsite to observe any evidence of untoward activities that may hint at any instances of human rights abuses or modern slavery situations.



Communicating our human rights expectation

Consistent with this Statement, Ingenia is committed to conducting its business in an ethical and professional manner. In accordance with that commitment, the Group has many policies which support the objectives of the Modern Slavery Act, including the following:

Policy	Purpose	Implementation Actions
Code of Conduct	This policy outlines what constitutes appropriate behaviour and standards for the Group. Ingenia expects all employees to conduct all business affairs legally, ethically and with strict observance of the highest standards of integrity and propriety.	All employees are required to complete a Compliance Module which includes the Code of Conduct as part of their onboarding. Existing staff are required to refresh their understanding of this policy at least every 2 years.
Supplier Code of Conduct	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 new suppliers are asked to read and sign a copy of the Ingenia Supplier Code of Conduct as part of the onboarding process.
Anti-bribery and Corruption Policy	Articulates our commitment to complying with laws and regulations addressing fraud, bribery and corruption across the Group	All new staff are required to complete a Compliance Module which includes the Anti-bribery and Corruption Policy. They must sign off that they are willing to abide by the policy within the first 3 months of employment. Existing staff are required to refresh their understanding of this policy at least every 2 years.
Whistleblower Speak Up	An anonymous reporting channel for employees (including contractors) and their families and associates to raise serious matters they may not feel comfortable raising through other channels including breaches of the law and/or conduct that breaches any other policies.	Published both internally and externally on the Ingenia website. Whistleblower flyers are displayed across all Ingenia properties in locations that allow those who may be impacted time to read and understand their options. Training is provided to those roles which have responsibilities under the Ingenia Whistleblower framework.
Appropriate Workplace Behaviour/ Grievance Policy	Whilst the approach around grievances may depend on the circumstances, there are a number of avenues available including the Appropriate Workplace Behaviour Policy, in the event an employee or contractor is happy to engage directly with Ingenia, this is the process used. Anonymous and external complaints have the Whistleblower Speak Up hotline available to them.	Available for all employees on the internal intranet.
Diversity and Inclusion Policy	The Group respects and values the diversity of its team members, suppliers, customers, residents, and stakeholders and is committed to finding ways to actively support and encourage a diverse workforce and inclusive workplace now and into the future.	Available for all employees on the internal intranet.
Outsourcing Policy	This policy outlines the specific processes and controls regarding the appointment and monitoring of external service providers that must be adhered to.	Available for all employees on the internal intranet.
Privacy Policy	This policy outlines how Ingenia is committed to protecting all personal information that it handles in accordance with all legal and regulatory obligations. This includes how the Group holds, collects, uses and discloses personal information.	All new staff are required to complete a Compliance Module which includes the Privacy Policy. They must sign off that they are willing to abide by the policy within the first 3 months of employment. Existing staff are required to refresh their understanding of this policy at least every 2 years.

In FY23, all relevant policies were reviewed and updated either internally or by external consultants. Any changes are approved by the Board as necessary and communicated to all relevant employees.



50%

Female Directors¹

64%

Female employees in the Group Executive²

66%

Female employees in the whole organisation³

60%

Female employees in senior positions⁴

- 1 Excluding CEO and Sun Communities Nominee Director
- 2 Includes CEO
- 3 Includes CEO, excludes Directors
- 4 Senior positions include management and senior management positions

Diversity and Inclusion

At Ingenia we embrace and value all employee differences including gender, age, culture, ability, and lifestyle choices and support all employees in realising their potential and pursuing their career goals.

Our recent employee survey provided additional insight into our organisational diversity, and for the first time, has given us a broader understanding of our employee’s backgrounds and the diverse perspectives they represent.

84%* of employees agreed that all individuals, regardless of their background, have equal opportunities to succeed at Ingenia

* Based on 2023 employee survey.

Training

While the potential exposure to modern slavery risk varies across Ingenia, the Group aims to continually raise awareness and educate all staff on the risk of modern slavery.

During the period, training has continued to be rolled out across all new employees via our online learning platform as well as annual training for all existing employees to not only ensure they are educated on their own rights, but also ensure key staff within our parks and communities are alert to potential risk and escalate any occurrences accordingly. The external training module outlines what modern slavery is, its relevance to the Group’s business, and how to report any suspected incidents (both internally and via the Group’s externally run whistle-blower reporting channels).

As this training forms part of the mandatory compliance training suite, completion rates are reported regularly to the ARSC. On 30 June 2023, 69% of staff had completed this mandatory training.

Key team members also attended a number of workshops during the year provided by Edge Environment, an external human rights subject matter expert which provided greater understanding of modern slavery risks and the Group’s actions to identify, manage and respond to this risk.

Remediation

We recognise the need to have processes in place to act where an incidence of modern slavery is identified. Where appropriate we will seek to remediate or cooperate in the remediation of modern slavery incidents caused by our own activities or to which we have contributed through our suppliers.

As a result of the risk and opportunity analysis referred to previously, we have adopted a category audit approach to supplier risk management and found that the most likely areas where modern slavery may occur for Ingenia continue to be construction, home building and security and cleaning services, which we closely monitor.

All risk and opportunity assessments undertaken to date in relation to Ingenia's supply chain have not identified any occurrences of modern slavery or human trafficking and therefore no remediation has been required.

Grievance Mechanism

Grievance mechanisms are a key part of our approach to ensure that there is an independent and, where required, confidential mechanism to report potential human rights or modern slavery issues.

The ARSC oversees the Whistleblower Policy and associated actions.

The grievance mechanism allows an employee (or their family members), director, officer, board member, temporary worker, volunteer, independent contractor, or supplier who has reasonable grounds to suspect they have information concerning misconduct or an improper situation or circumstances including concerns of modern slavery, harassment, bullying or working under duress to raise a concern using the Whistleblower reporting channels.

The Group has an external independent Speak Up Integrity hotline which allows a concern or complaint to be reported anonymously through Ingenia's independent whistleblowing service provider, Core Integrity, with all the usual Whistleblower protections.

The hotline is also available to suppliers working in our sites, with information and signage displayed across our sites.

The remediation needs of a victim can greatly vary, as will the circumstances and context of the situation and the Group's overarching focus through the remediation process is protecting the victim and always acting in their best interests.



Ingenia

Everyone has a role to play. Speak Up today.

Ingenia Communities Group is committed to promoting a high standard of ethical and accountable behaviour.

We place great importance on fostering a culture that encourages employees to speak up about issues or a conduct that concerns them.

There is no tolerance for any form of intentional wrongdoing and everyone who works with Ingenia is encouraged to raise and report any conduct they believe to be inappropriate or wrong.

Ingenia Whistleblower Hotline

  1800 324 775

 speakup@coreintegrity.com.au

 Speak Up P.O. Box 730, Milsons Point, NSW, 1565

Criteria 1

Criteria 2

Criteria 3

Criteria 4

Criteria 5

Criteria 6

Criteria 7

Assessing the Effectiveness

During the reporting period to 30 June 2023, Ingenia Communities did not receive any complaints nor identify any breaches of our Modern Slavery or Human Rights obligations through our domestic contractors or suppliers of goods and services.

During the period, 703 new suppliers were onboarded. The onboarding process includes acceptance of the Supplier Code of Conduct.

No Modern Slavery concerns were raised during FY23 via the Ingenia Speak Up hotline or any other form of Whistleblower reporting.

Our business is committed to fostering strong collaborative relationships with our suppliers and therefore in accordance with the diverse nature of the business and the regional locations of our residential communities, we have developed close and long-standing relationships with local service providers at a local management level. Our employees and key suppliers are aware of our policies and procedures and the mechanisms for concerns or breaches to be raised and escalated.

In accordance with this, each month our Group Risk and Compliance Manager conducts an internal audit of incidents, breaches and notifications which includes notifications of whistleblowing and grievance lodgement. Where a breach is material, that detail is documented and escalated in the Risk & Compliance Report for review by the ARSC, comprising three independent non-executive Board members.

Consultation

This Statement has been prepared in conjunction with internal stakeholders from across the Group including Eighth Gate & Sungenia and led by the Ingenia Communities ESG Committee which includes subject matter experts from:

- Sustainability
- Procurement
- Legal and Governance
- Risk Management
- Compliance.

The Group has also taken into consideration feedback provided during the year by the Australian Council of Superannuation Investors (ACSI Report) and other investor groups.

We have incorporated this feedback into our future planning and our evolving disclosures.



Controlled Entities

This statement covers the following Ingenia Communities Group entities and their subsidiaries:

- › Ingenia Communities Holdings Limited
- › Ingenia Communities RE Limited as Responsible Entity for Ingenia Communities Management Trust and Ingenia Communities Fund
- › Eighth Gate Capital Management Pty Ltd
- › Eighth Gate Pty Ltd as Trustee and AFSL holder for Eighth Gate residences No.3-8
- › Sungenia Land Co Pty Ltd as trustee for Sungenia Land Trust
- › Sungenia Op Co Pty Ltd as trustee for Sungenia Operations Trust
- › Sungenia Development Pty Ltd

Consultation with Eighth Gate and Sungenia has been undertaken throughout the reporting period through the ESG Committee which comprises executive members of all entities as mentioned in the Consultation section of this Statement.

Criteria 1

Criteria 2

Criteria 3

Criteria 4

Criteria 5

Criteria 6

Criteria 7

Progress Against our Commitments

In FY23 we made considerable progress in the development of our assessment tools and processes, including our Responsible Sourcing Framework, our Supplier Questionnaires, risk assessment and educating and informing our teams.

These actions create a solid foundation for our continued rollout of procurement practices, supply chain assessments and management of modern slavery risk.

During FY24, Ingenia will continue to work to further refine the Group's Modern Slavery Responsible Sourcing Framework and to enhance the Group's approach to the important issue of modern slavery.

Ongoing communication regarding best practice and procurement methodologies, along with training to build internal capacity and due diligence, will help continue to assist in mitigating any exposure to and unintended involvement in modern slavery. We will continue to refine, implement, and embed practices across the Group with an initial focus remaining on upskilling employees who deal with Priority 1 suppliers, and continue the conversation with our suppliers around Ingenia's expectations whilst collaborating with them to address any areas of concern.

Our work in FY24 will build on actions undertaken in FY23, as outlined below.

ACTION	PROGRESS IN 2023
 Continue to strengthen Modern Slavery Framework	<ul style="list-style-type: none"> ✓ Implemented Modern Slavery Responsible Sourcing Framework. ✓ Continuous improvement of data capture for reporting and supplier prioritisation and categorisation. ✓ Implementation of the Ingenia Whistleblower Speak Up hotline.
 Education	<ul style="list-style-type: none"> ✓ Modern Slavery training is a core component of the onboarding process for new employees. ✓ Ongoing annual Modern Slavery training for all staff. ✓ External Responsible Sourcing Framework workshop attended by key team members.
 Collaboration	<ul style="list-style-type: none"> ✓ Ongoing collaboration with human rights subject matter experts (Edge Environment) for review of Ingenia Modern Slavery and responsible sourcing activities and training.
 Engagement with suppliers	<ul style="list-style-type: none"> ✓ Continued to have all new suppliers complete the Supplier Code of Conduct. ✓ Rollout of Modern Slavery Supplier Questionnaire to key prioritised suppliers as a trial, in preparation for broader rollout in FY24.
 Governance	<ul style="list-style-type: none"> ✓ Refinement of Internal ESG Committee roles and objectives. ✓ Regular meetings of the ESG Committee which include updates and discussion on our Modern Slavery and Human Rights obligations.






Next Steps

Understanding Ingenia's broader supply chain is a complex process due to the diverse nature of suppliers required to support the business. Ingenia is currently moving towards a more centralised procurement process which will allow greater control when appointing and managing our supply chain.

The ESG Committee will continue to progress our response towards the identification and monitoring of modern slavery activity within our operations and supply chain, and to monitor the effectiveness and promote continuous improvement through our actions.

Over time, we also expect supplier transparency and business practices external to Ingenia Communities to improve, allowing us to continue to uphold our responsibility to not tolerate slavery, human trafficking, forced or child labour or child exploitation of any kind.

Our priorities for FY24 are outlined below:

ACTION	FY2024
 Continue to strengthen our Modern Slavery Responsible Sourcing Framework	<ul style="list-style-type: none"> → Continue to extend and refine Responsible Sourcing Framework. → Further supplier analysis including integration of assessment into large procurement decisions. → Agreement by the Executive Committee to review all suppliers with an annual spend of over \$1m. → Embed Responsible Sourcing Framework into procurement and supplier management for Priority 1/high risk/over \$1m spend. → Additional training tailored to Development. → Review of all new and existing development and design contracts.
 Education	<ul style="list-style-type: none"> → Continue with Modern Slavery training as part of the onboarding process for new employees. → Greater focus on the number of existing employees completing the Modern Slavery training via the online training platform.
 Collaboration	<ul style="list-style-type: none"> → Ongoing collaboration with the Group and suppliers human rights subject matter experts (Edge Environment) for review of Ingenia Modern Slavery and responsible sourcing activities and training.
 Engagement with suppliers	<ul style="list-style-type: none"> → Rollout questionnaire to all Priority 1 high risk suppliers.
 Governance	<ul style="list-style-type: none"> → Continue to improve data capture and quality.

Criteria 1

Criteria 2

Criteria 3

Criteria 4

Criteria 5

Criteria 6

Criteria 7



Ingenia

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