4 November 2026

ASX Limited – Listings Compliance (Sydney)

By email: listingssupervisionsydney@asx.com.au

Dear Sir or Madam

Ingenia Communities Group (ASX: INA): Compliance with Listing Rule 15.7

Ingenia Communities Group (**Ingenia**) refers to ASX's letter dated 28 October 2026 (**ASX Letter**) regarding Ingenia's compliance with Listing Rule 15.7. Capitalised terms used in this letter have the meaning given in the ASX Letter unless otherwise defined.

Ingenia has made reasonable enquiries to put itself in a position to answer ASX's questions. Ingenia's responses to each of ASX's questions are set out below.

Question 1
Did INA, or anyone representing INA, provide a statement to the media concerning the information in the Articles?

No. Ingenia has sought, and received, written confirmation from each of its directors, members of its executive team and its financial and legal advisers that neither they nor, to their knowledge, anyone acting on their behalf provided any statement or information to the media (whether on or off the record, or under embargo) concerning the information in the Articles.

Question 2

If the answer to question 1 is 'yes': (2.1) please provide a copy of that correspondence (not for release to the market); (2.2) explain when (time and date), and by whom, the information was first provided to the media; and (2.3) does INA consider this to be compliant with Listing Rule 15.7? If so, please explain the basis for that view.

Not applicable, given Ingenia's answer to question 1.

Question 3
If the answer to question 1 is 'no', is there any other explanation as to how the information appeared in the Articles?

Ingenia is not aware of how the information in the Articles came to be published. However, Ingenia notes that:

For personal use only

LEVEL 10, 20 BOND STREET
SYDNEY NSW 2000
1300 132 946
ingeniacommunities.com.au

(a) each of Ingenia's directors, employees and advisers who was aware of the information in the Articles was subject to an obligation to keep that information confidential and, as noted in Ingenia's response to question 1, Ingenia has received written confirmation from each of its directors, members of its executive team and its financial and legal advisers in the terms described in that response;

(b) pursuant to contractual obligations, Ingenia was required to provide drafts of the Announcements to Peet Limited (**Peet**), AVID Property Group Holdings Pty Ltd (AVID) and Warburg Pincus (Singapore) Pte Ltd (**Warburg Pincus**) before their release to ASX. Each of those parties is subject to confidentiality obligations to Ingenia; and

(c) on the day each Article was published, Ingenia lodged the relevant Announcement with ASX before the commencement of normal trading, and it was released to the market before trading in Ingenia's securities commenced that day. The First Announcement was lodged at 9:50am AEDT and released at 9:57am AEDT on 26 October 2026, and the Second Announcement was lodged at 9:53am AEDT and released at 9:56am AEDT on 28 October 2026.

Question 4

What arrangements does INA have in place to ensure compliance with Listing Rule 15.7?

Ingenia has the following arrangements in place:

(a) **Continuous Disclosure Policy:** Ingenia has a Continuous Disclosure Policy, which is available on its website. Under that policy, only authorised spokespersons may speak to the media, and they must not disclose or comment on price sensitive information until it has been released to the market. Price sensitive information that has not been disclosed must not be passed on to third parties other than those connected with the relevant transaction;

(b) **Confidentiality obligations:** each of Ingenia's advisers, AVID, Warburg Pincus and Peet is subject to confidentiality obligations to Ingenia, which extend to their respective advisers and financiers;

(c) **Leak strategy:** Ingenia's legal and financial advisers have prepared a leak strategy for Ingenia setting out the process to be followed if there is media or other speculation concerning a potential control transaction involving Ingenia, including monitoring media and trading in Ingenia's securities and having draft announcements prepared in advance; and

(d) **Restricted access:** information concerning the AVID and Warburg Pincus proposals has been restricted to those of Ingenia's directors, employees and advisers who need to know

For personal use only

it, each of whom is aware of Ingenia's continuous disclosure obligations and the requirements of the Continuous Disclosure Policy, including that no price sensitive information may be released to any external party before it has been released to the market.

Question 5

In light of the Articles, what additional steps will INA take to ensure compliance with Listing Rule 15.7?

It is of concern to Ingenia that the information appeared in the Articles before the release of the Announcements. While Ingenia considers that its existing arrangements are adequate, in light of the Articles, Ingenia has reminded and continues to remind its directors, employees and advisers, and each of AVID, Warburg Pincus and Peet, of their obligations to keep information concerning Ingenia and the AVID and Warburg Pincus proposals confidential.

Question 6

Please confirm INA's responses to the above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its Board or an officer of INA with delegated authority from the Board to respond to ASX on disclosure matters.

Ingenia confirms that the responses in this letter have been authorised and approved in accordance with the Continuous Disclosure Policy and by the Board of Ingenia.

Yours faithfully

Charisse Biddulph
Company Secretary & Head of Legal
Ingenia Communities Group

For personal use only

For personal use only

28 October 2026

Ms Charisse Biddulph
Company Secretary & Head of Legal
Ingenia Communities Group
Level 10, 209 Bond Street
Sydney NSW 2000

By email

Dear Ms Biddulph

Ingenia Communities Group ('INA'): Compliance with Listing Rule 15.7

ASX refers to the following:

A. The article appearing in Australian Financial Review titled 'Warburg Pincus partners up with ART, Lederer family for Ingenia' published online at 9:45 AM AEDT on 26 October 2026 (the **First Article**) which stated:

> "*Avid us working with Brookfield's property team in Sydney and had tabled an offer to Ingenia at the weekend, just as Warburg Pincus's dealmakers were pushing to secure exclusivity with their $5.25 a security bid."*

B. The article appearing in Australian Financial Review titled 'Warburg Pincus partners up with ART, Lederer family for Ingenia' published online at 8:43 AM AEDT on 28 October 2026 (the **Second Article**) which stated:

> *"Global buyout firm Warburg Pincus has teamed up with superannuation giant Australian Retirement Trust and the wealthy Lederer Family in its bid to take ASX-listed Ingenia Communities private.*
>
> *Under the plan stitched up overnight, ART would take the Ingenia Holiday Parks arm of the business while the Lederer family office would take control of Ingenia Gardens. Theland lease communities core business would stay with Warburg Pincus."*

*(together the '**Articles**')*

C. INA's announcement titled 'Receipt of Indicative Proposal from AVID to acquire Ingenia' lodged with the ASX Market Announcements Platform (**MAP**) at 9:50 AM AEST and released at 9:57 AM AEDT on 26 October 2026 (the '**First Announcement**') in which INA disclosed:

> *Ingenia Communities Group (ASX:INA) (**Ingenia**) advises that, after market close on 23 October 2026, it received an unsolicited, non-binding indicative proposal (**AVID Indicative Proposal**) from AVID Property Group Holdings Pty Ltd (**AVID**), with backing from a global sovereign wealth fund and a global financial sponsor, to acquire 100% of Ingenia's stapled securities, by way of scheme of arrangement and inter-conditional trust scheme, at a price of $5.35 cash per stapled security, which AVID proposes will not be reduced by any distribution paid by Ingenia in respect of the half year ending 31 December 2026 of up to $0.05 cash per stapled security (Permitted Distribution). Ingenia securityholders would therefore receive a total of up to $5.40 cash per Ingenia stapled security."*

D. INA's announcement titled 'Receipt of Indicative Proposal from AVID to acquire Ingenia' lodged with the ASX Market Announcements Platform (**MAP**) at 9:53 AM AEDT and released at 9:56 AM AEDT on 28 October 2026 (the '**Second Announcement**') in which INA disclosed:

> *"Ingenia Communities Group (ASX:INA) (**Ingenia**) advises that it has received a further revised, non-binding indicative proposal dated 27 October 2026 from Warburg Pincus LLC*

*and/or its affiliates (**Warburg Pincus**), together with its co-investors, to acquire 100% of Ingenia's stapled securities, by way of inter-conditional scheme of arrangement and trust schemes, at a price of $5.45 cash per stapled security, …"*

(together the '**Announcements**')

E. Listing Rule 3.1 which states:

> *"Once an entity is or becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities, the entity must immediately tell ASX that information"*

F. Listing Rule 15.7 which states:

> *"An entity must not release information that is for release to the market to any person until it has given the information to ASX and has received an acknowledgment that ASX has released the information to the market."*

G. The note to Listing Rule 15.7 which states:

> *"Note: This rule prohibits an entity giving information to the media even on an embargoed basis."*

As the Articles were published prior to the Announcements being released on MAP, it appears that INA may have breached Listing Rules 3.1 and/or 15.7.

Request for Information

Having regard to the above, ASX asks INA to respond separately to each of the following questions and requests for information:

1. Did INA, or anyone representing INA, provide a statement to the media concerning the information in the Articles?
2. If the answer to question 1 is 'yes':
   - 2.1 please provide a copy of that correspondence (not for release to the market);
   - 2.2 explain when (time and date), and by whom, the information was first provided to the media; and
   - 2.3 does INA consider this to be compliant with Listing Rule 15.7? If so, please explain the basis for that view.
3. If the answer to question 1 is 'no', is there any other explanation as to how the information appeared in the Articles?
4. What arrangements does INA have in place to ensure compliance with Listing Rule 15.7?
5. In light of the Articles, what additional steps will INA take to ensure compliance with Listing Rule 15.7?
6. Please confirm INA's responses to the above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its Board or an officer of INA with delegated authority from the Board to respond to ASX on disclosure matters.

ASX expects INA to make reasonable enquiries to put itself in a position to answer the questions above.

When and where to send your response

For personal use only

This request is made under Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **9:00 AM AEDT Monday, 2 November 2026**. Your response should be sent by e-mail to **listingssupervisionsydney@asx.com.au**. It should not be sent directly to the ASX Market Announcements Office.

Release of correspondence between ASX and entity

We reserve the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Regards

ASX Supervision

For personal use only