

ANNEXURE 5
IFM RESPONSE TO QUESTIONS 2 AND 3

	Description of conduct, practice, behaviour or activity	Subject of another inquiry or investigation, or a criminal or civil proceeding?	Attributable to particular culture or governance practices of the entity?	Attributable to some broader cultural or governance practices in the industry or sector of the industry in which the entity operates?	Resulting from other practices (including risk management, recruitment or remuneration practices)?	What steps has the entity taken to (i) remedy the consequences for consumers or other Businesses, and (ii) prevent recurrence of conduct, practice, behaviour or activity?
1	<p>Date of occurrence: 28 May 2009; 13 October 2014</p> <p>Date entity became aware of conduct, practice, behaviour or activity: 1 June 2009; 13 October 2014</p> <p>Under the Corporations Act 2001 (Cth), a person who acquires a substantial interest (including ownership or control of >5% shares) of a listed entity must submit a notice to the Australian Securities Exchange ("ASX") within 2 business days.</p> <p>On 25 May 2009, the transfer of shares in AIO as part of the new IFM AustralianSuper mandate pushed IFM Group's aggregate substantial interest over 5%, requiring notice to ASX. This was not identified at the time and the notice to ASX was lodged late on 1 June 2009. A similar issue occurred in October 2014 where IFM (Small Caps Group) purchased shares in an entity on behalf of 4 investors. Individually, these investment amounts do not trigger substantial shareholder reporting obligation, however collectively they exceed the 5% trigger.</p>	Yes, matter reported to ASIC via lodgement of forms	No	No	No	<p>Date of resolution: 1 June 2009; October 2014</p> <p>Notices have been lodged late and there were no penalties/liabilities.</p> <p>Internal process enhanced.</p> <p>No investors suffered any loss.</p>

