



# CODE OF CONDUCT AND ETHICS

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# Auswide Bank Code of Conduct and Ethics

## 1. Introduction

Auswide Bank is committed to achieving outstanding customer service, performance standards and returns to provide value to our shareholders, while always considering the interests of employees, customers, business partners and the community.

In working towards achieving this, we should not compromise our values, ethics, and principles. Auswide Bank places great significance on honesty, integrity, and trust.

We ask that all Directors, key executives, employees, and associated business partners:

- Demonstrate the behaviours of honesty, integrity, and trust at all times and in all their dealings with our customers.
- Set an example for others to follow and seek to recognise those that demonstrate these positive behaviours.
- Speak up without fear of retribution when these behaviours are threatened or may be compromised.

## 2. What is the purpose of the Code of Conduct and Ethics

The purpose of the Code of Conduct and Ethics is to set standards for the way we operate at Auswide Bank.

<b>We conduct ourselves professionally and value Auswide Bank's reputation at all times.</b>	We behave in a professional manner that promotes trust, confidence and goodwill from our shareholders, customers, and people we do business with.
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<b>We act with honesty, integrity and fairness and treat others with respect, value difference and maintain a safe working environment.</b>	We act with honesty, integrity, and fairness to promote confidence in Auswide Bank. We are encouraged to speak up and escalate any concerns. We value difference and are committed to achieving a diverse and inclusive workforce in a safe working environment that promotes health and wellbeing.
<b>We identify conflicts of interest and manage them responsibly.</b>	We ensure our personal and business interests do not interfere with our ability to make professional, sound, and objective decisions and to deliver our financial services efficiently, honestly, and fairly.
<b>We meet our legal and regulatory obligations and internal policies and procedures.</b>	We comply with all laws, regulations and codes that are applicable to us, including all internal Auswide Bank policies and procedures.
<b>We respect and maintain privacy and confidentiality.</b>	We protect confidential information regarding customers, fellow employees, and business partners.
<b>We deal with and immediately report on any breaches, suspected unethical practices or wrongdoing.</b>	We investigate, deal with, and appropriately report on occurrences of suspected breaches, unethical practices or wrongdoing by persons employed directly by us or contracted to us.

Code of Conduct and Ethics is supported by a number of more detailed policies that are available on Auswide Bank’s intranet, AB CONNECT.

### **3. Who does the Code apply to?**

The Code of Conduct and Ethics applies to Auswide Bank’s directors, key executives and anyone who is employed by or works at Auswide Bank, or its’ related bodies corporate (either permanent or temporary), contractors, consultants.

Auswide Bank encourages our business partners to adopt and maintain similar conduct and ethics principles to those outlined in the Code of Conduct and Ethics.

### **4. When does the Code apply?**

The Code applies to you whenever you are a representative of Auswide Bank. In some circumstances, this will include times when you are outside your immediate workplace or

working hours, for example at work functions, out of hours work activities or when you are out in the community on behalf of Auswide Bank.

## **5. What will happen if I do not comply with the Code of Conduct and Ethics?**

Failure to comply with the principles of the Code may be considered serious misconduct and will be investigated under the *Disciplinary Procedure and Sanctions Policy*. This may result in disciplinary action ranging from a verbal warning through to the termination of your employment for serious misconduct.

If you are in doubt about whether your conduct is consistent with the Code of Conduct and Ethics, it may assist you to ask yourself the following questions:

- Does it feel right?
- What would an Auswide Bank customer or shareholder expect or want me to do in this situation?
- What would the reaction be if this was reported in the newspaper or on social media?
- Would my fellow employees or reporting leader consider my behaviour to be appropriate?

## **6. How does Auswide Bank ensure the Code is effective?**

People & Property are responsible for the ongoing review and development of the Code of Conduct and Ethics.

On commencement of employment and every twelve months after that, everyone who is employed by or works at Auswide Bank must complete refresher training to show that they understand the principles of the Code.

## **7. We conduct ourselves professionally and value Auswide Bank's reputation at all times**

Auswide Bank's professional reputation as a trusted and respected organisation is one of our greatest assets. Each one of us has the ability to build and maintain the reputation of Auswide Bank, or to harm that reputation and undermine our performance.

Auswide Bank's shareholders, our customers, and the community in general expect that the Bank and everyone who works at Auswide Bank to act professionally and ethically. We must do what we can to meet these expectations and support others to do the same. Each day, you should consider how your or someone else's actions could impact on our credibility, performance and reputation and take action to prevent or remedy anything that could adversely impact Auswide Bank.

### **What you must do:**

- Undertake your duties and responsibilities with care and diligence. Remember, you are accountable for the decisions you make and the actions you take.
- Deal fairly and honestly with all Auswide Bank's customers, suppliers and any other third parties or business partners.
- Only provide advice to customers that you are authorised to provide in the course of your work.
- Help protect Auswide Bank and its customers against potential theft or fraud.
- Help protect Auswide Bank from being associated with money laundering or terrorist financing. This includes always being alert to suspicious customer behaviour and reporting suspicious activity.
- Exercise your delegated authorities, including your credit decisions, work expenditure and corporate credit card funds responsibly and within their limits. You are responsible for understanding your delegated authorities, including any relevant limits and are accountable for how they are used.
- Keep your accounts in order at all times and comply with the terms and conditions applying to any product you use.
- Behave in a manner that takes into account our impact on the broader community and the environment.
- Use all of Auswide Bank's systems and equipment appropriately and for proper purposes. This includes email, messaging, internet access, and technology and banking systems.
- Never entertain customers or clients or participate in Auswide Bank's activities or functions in a way that may damage Auswide Bank's reputation.

## Where to seek assistance

If you are experiencing any financial or personal difficulties that may result in non-compliance, there is support available. You should speak with your reporting leader or People & Property who will assist and may direct you to suitable resources. The **Employee Assistance Program (EAP)** is also available to provide independent and confidential counselling services for any work or non-work-related difficulties you may be facing.

## 8. Board of Directors conduct themselves professionally and value Auswide Bank's reputation at all times

It is important to enable the Board to operate effectively in the single-minded pursuit of the best interest of Auswide Bank as a whole, with this Code of Conduct governing the relationship between the Board, key executives, and management, between the Director and the Board and amongst individual Directors.

### What they must do:

- Act honestly, in good faith and in the best interests of Auswide Bank as a whole.
- Have a duty to use due care and diligence in fulfilling the functions of office and exercising the powers attached to that.
- Undertake diligent analysis of all proposals placed before the Board.
- Bring an open and independent mind to Board meetings, listen to the debate of each issue raised, consider the arguments for and against each motion and reach a decision that he or she believes, in good faith and on reasonable grounds, to be in the best interest of Auswide Bank as a whole. A director should not make a decision about a matter before attending a Board or Committee meeting and participating in the deliberations of that meeting.
- Provide individual Directors with the opportunity to put his or her views on issues before the Board or a committee on which he or she sits. While Directors must treat each other with courtesy and observe the rules in this

Code of Conduct, Directors should be able to engage in vigorous debate on matter of principle.

- Act with a level of skill expected from Directors of a publicly listed Company.
- Use the powers of office for a proper purpose, in the best interests of Auswide Bank as a whole.
- Demonstrate commercial reasonableness in decision.
- Will not make improper use of information acquired as Directors.
- Don't disclose non-public information except where disclosure is authorised or legally mandated.
- Keep confidential, information received in the course of the exercise of their duties and such information remains the property of Auswide Bank from which it was obtained, and it is improper to disclose it, or allow it to be disclosed, unless that disclosure has been authorised by the person from whom the information is provided or is required by law.
- Don't take improper advantage of the position of Director or use the position for personal gain or to compete with Auswide Bank.
- Protect and ensure the efficient use of Auswide Bank's assets for legitimate business purposes.
- Don't allow personal interests, or the interest of any associated person, to conflict with the interests of Auswide Bank.
- Have an obligation to be independent in judgement and actions and Directors will take all reasonable steps to be satisfied as to the soundness of all decisions of the Board.
- Make reasonable enquiries to ensure that Auswide Bank is operating efficiently, effectively, and legally, towards achieving its goals.
- Don't be discourteous towards fellow Directors or staff or make personal attacks on a fellow Director or a member of staff.
- Encourage fair dealing by all employees with Auswide Bank's customers, suppliers, competitors, and other employees.
- Encourage the reporting of unlawful, unethical behaviour and actively promote ethical behaviour and protection for those who report violations in good faith.
- Devote such time as necessary to carry out the duties of the non-executive Director as determined by the Board.
- Have an obligation, at all times, to comply with the spirit as well as the letter of the law and with the principles of this Code of Conduct or in discussion with others or in public statements.
- Don't engage in conduct likely to bring discredit upon Auswide Bank.



## **9. We act with honesty, integrity and fairness and treat others with respect, value difference and maintain a safe working environment.**

Honesty, integrity, and fairness are critical to everything we do at Auswide Bank and our success depends on the trust of our customers. Auswide Bank values difference and is committed to achieving a diverse workforce that remain inclusive and respectful of each other's differences.

Unlawful discrimination, harassment of any kind, bullying or victimisation or other unacceptable or offensive conduct will not be tolerated.

Auswide Bank aims to provide a safe working environment where the safety, security and physical and mental health of its people is considered critical to its success.

### **What you must do:**

- Treat all people you deal with through your work at Auswide Bank with dignity and respect.
- Immediately report any suspicions of fraud, theft, or other dishonest behaviour by others (including fellow employees or customers).
- Immediately, but not later than 48 hours after, advise your reporting leader if you have been charged or convicted of an indictable offence.
- Never inappropriately use your position with Auswide Bank or any information you receive through your work at Auswide Bank to further your own personal interests or help others to do so.
- Never assist a customer or anyone else to break or evade the law.
- Consider the interests and needs of the customer when providing advice, products, or services to them.
- Be professional, honest, and upfront in all of your communications and dealings with Auswide Bank, including your reporting leader, fellow employees, customers, auditors, and regulators. This includes communications and dealings with a customer, as well as anyone else who works within Auswide Bank.
- Ensure all dealings (such as transactions or commitments to deliver) with customers, suppliers, third parties and business partners are properly recorded and transparent.
- Utilise Auswide Bank's assets and funds (including corporate credit cards) for legitimate business expenses and purposes and keep accurate and transparent records of all payments or receipts for transactions using Auswide Bank's funds.

- Never structure or amend any transaction to disguise, conceal or misrepresent the involvement of any part or the true nature of the transaction (e.g., conceal money laundering or assist in the structuring of transactions to avoid reporting).
- Make recruitment and promotion decisions based on merit and not on attributes that are irrelevant to employment or performance.
- Never unlawfully discriminate, harass, or bully your fellow employees, customers, or anyone else in the workplace. This includes being aware that some behaviours which may be acceptable to you, may not be to others and act appropriately.
- Contribute to promoting a safe working environment by taking responsibility for health and safety and reporting any threats, hazards, or incidents as soon as possible.
- Accept and seek to resolve with no bias any genuine complaint of unacceptable behaviour.

## **10. We identify conflicts of interest and manage them responsibly.**

Acting honestly and with integrity also requires managing conflicts of interest and never putting yourself in a situation that places, or appears to place, your own personal interests before those of Auswide Bank and of our customers.

You must always be mindful of when a conflict may be perceived by others and take action to avoid or address this risk.

### **What you must do:**

- Be alert to actual, apparent or potential conflicts of interest.
- Employees must not use any of Auswide Bank's and customers' confidential information for personal gain or for the benefit of others.
- Employees must not allow any personal relationships with customers or third parties to interfere with their duties in Auswide Bank.
- If you are about to undertake any Auswide Bank financial transaction on your own behalf and you are unsure whether a conflict of interest or a breach of policy or risk exists, you must refer the matter to your reporting leader or Head of Compliance before undertaking the transaction.
- Disclose to your reporting leader any personal associations with a third party that you are involved in evaluating or negotiating with to acquire goods and services for Auswide Bank, whether for employment, as a customer or supplier of services or any other reason in which you will obtain a personal benefit or gain.

- Integrity and trust are inconsistent with acceptance of improper gifts, payments, benefits, or gains of any kind. Where gifts or rewards from a current or potential customer or supplier create any obligation or expectation that you will give preferential treatment to the person or company making the offer, the reward or gift is improper and must be refused or referred to your reporting leader.
- You must not use any inside information to gain any professional or personal advantage.
- Never trade in Auswide Bank shares if you have information that may affect the price of the shares and this information is not publicly known or generally available.
- If you believe you have a potential or perceived conflict of interest, you must disclose this fact to your reporting leader or to the Head of Compliance. You will be advised whether a Declaration of Conflicts of Interest form is required to be completed.

## **11. We meet our legal and regulatory obligations and internal policies and procedures**

You must comply with all laws, regulations and codes that are applicable to Auswide Bank as a financial services and credit provider. Failure to meet our legal and regulatory obligations can impact our credit and/or financial services licenses and/or result in penalties.

Although the laws that apply may be complex, ignorance is no excuse. You are ultimately responsible for understanding which laws and regulations apply to you and the work you perform. Auswide Bank is committed to helping you by designing systems and processes that comply with the law, and by providing relevant policies and training.

You must also comply with Auswide Bank's internal policies and procedures. Our compliance procedures and training protect our customers, you, and Auswide Bank.

### **What you must do:**

- Not take any action, or fail to take any action, that may breach Code of Conduct and Ethics, the law, Auswide Bank policies, procedures, or practices.
- Complete all compliance and other training programs to build and maintain your awareness and understanding of relevant laws, policies, procedures, and practices.  
This includes meeting any mandatory compliance training by the due date.
- Complete and close out any compliance and audit issues assigned to you by the due date.

- Identify, record, escalate and manage risks to mitigate and reduce risk in Auswide Bank.
- People leaders must ensure their employees are aware of and have met their compliance requirements. Any instances of non-compliance must be addressed in a timely manner. People leaders are reminded that gate openers to their performance may be impacted where they do not appropriately manage risk and compliance by one of their team members.

## **12. We respect and maintain privacy and confidentiality**

Whilst working at Auswide Bank, you may have access to private and confidential information relating to Auswide Bank, your fellow employees, customers, suppliers or other third parties. When people provide us with this type of personal information, they are trusting Auswide Bank to keep it safe.

Personal information is any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable including customers and contractors and must only be viewed, collected, used, disclosed, updated, stored securely and destroyed in accordance with the Auswide Bank Information Security User Manual, the *Privacy Act 1988* (Cth) [Privacy Act] and the Auswide Bank Information and Records Management Manual.

Misuse of this information can have severe commercial and reputational consequences for Auswide Bank and can greatly affect those whose information is misused. If people feel they can't trust us with their information, they are unlikely to trust us with their finances or business.

Auswide Bank has made commitments to our customers and others to protect their personal information as detailed in our Privacy Policy. This policy applies to all employees of Auswide Bank and explains how we must comply with privacy and data protection obligations.

### **What you must do:**

- You must ensure that you keep information secure. This includes not sharing private or confidential information with other fellow employees unless they need it to perform their job role at Auswide Bank.
- Never release information about customers or fellow employees to third parties outside of Auswide Bank unless the person the information relates to has agreed or if Auswide Bank is required to release the information under

the law. This includes not giving any information to family members, friends, or others about an account to which they are not a signatory or have authority to access information.

- Follow procedures and requirements to protect information whenever you provide details face to face, over the phone, by email or fax.
- Follow all protocols and procedures relating to the maintenance of passwords and user profile setup. Never allow someone else to log on using your individual details.
- Collect, use, store, handle, update and destroy information particularly personal information, in line with applicable policies and processes at all times.
- Never disclose any information about Auswide Bank that is not already in the public domain without the proper authority to do so.
- If you suspect that personal information is being misused, you must advise your reporting leader or report it to a Whistleblower Disclosure and Protection Officer. If for any reason you do not feel safe or able to make a disclosure internally you may do so to the Bank's independent whistleblower service provider, Your Call.

### **13. We deal with and immediately report on any breaches, suspected unethical practices or wrongdoing**

Auswide Bank is committed to promoting and maintaining a culture of compliance with the standards, requirements and expectations set out in the Code of Conduct and Ethics.

Anyone who is employed by or works at Auswide Bank or its' related bodies corporate (either permanent or temporary), contractors and consultants are required to comply with the Code of Conduct and Ethics and report any conduct that may be in breach of the law, Code of Conduct and Ethics or any other Auswide Bank policies or procedures.

Any reports of a breach of the code will be taken seriously and investigated appropriately. It is important that all reports are based on truth and fact. If a report is made in good faith, an employee will not be disadvantaged personally or in their employment, even if the conduct that is reported is later found not to be in breach of the Code. At the same time, if an intentionally false or malicious report is made, the reporting person may find themselves in breach of the Code of Conduct and Ethics and dealing with the consequences under the *Disciplinary Procedure and Sanctions Policy*.

To fulfil this commitment, Auswide Bank needs to be able to ensure that:

- Breaches of those standards, requirements and expectations are detected and reported; and
- Appropriate action is taken in response to any such breaches.

Accordingly, Auswide Bank expects each officer and employee to report, promptly and in good faith, any violation by an officer or employee of Auswide Bank of the standards, requirements or expectations set out in the Code of Conduct and Ethics (or any other unethical, unlawful, fraudulent, or corrupt behaviour) of which he or she becomes aware of or has reasonable grounds to suspect.

Auswide Bank recognises that the identity of the person or persons to whom any such breaches should be reported might vary depending on the particular circumstances. Subject to this, as a general rule, officers and employees are encouraged to report any such breaches to the Chairman of the Board or the Managing Director (in the case of directors and Managing Director direct reports) or to their reporting leader or a Whistleblower Protection and Disclosure Officer in other cases. If for any reason you do not feel safe or able to make a disclosure internally you may do so to an independent whistleblower service provider, Your Call.

Reports are confidential and protected by the Auswide Bank Whistleblower Protection Policy and Reporting Procedure.

Therefore, where an officer or employee reports, in good faith, an actual or suspected violation of Code of Conduct and Ethics.

- Auswide Bank will, to the extent practicable, keep the reporting person's identity confidential; and
- No disciplinary or other adverse action will be taken (or tolerated) against the reporting person as a consequence of reporting that violation.

### **What you must do:**

- Be conscious of what others around you are doing.
- Honestly report all actual or suspected breaches, suspected unethical practices or wrongdoing of the Code of Conduct and Ethics, the law, or Auswide Bank policies, immediately to either your reporting leader, People & Property, Risk or Compliance, a Whistleblower Protection and Disclosure Officer or through our external whistleblowing service Your Call.
- Remember that at any time you are able to report conduct where the conduct is dishonest, corrupt, fraudulent, illegal, and unethical or any other type of reportable conduct.