



Ethics and Integrity in Practice

CUA

BANKING | INSURANCE

How we conduct
ourselves at CUA

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Ethics and Integrity in Practice

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How we conduct ourselves at CUA



1. Introduction

1.1 WHY IS THIS DOCUMENT IMPORTANT?

Success comes from the commitment of each and every one of us to be part of a team that delivers our Purpose - Members working together through life's changes for mutual good. How we work together provides CUA the greatest opportunity to be truly exceptional - as a place to do your banking, and as a place to grow your career.

Your role involves making day-to-day decisions that affect your work colleagues, members and our communities. Sometimes, you may be asked to make decisions that have competing interests, objectives and priorities. It's not always easy, but we are here to support you.

Our CUA Ethics and Integrity in Practice, enables us to live the CUA values by guiding us in situations where there may be conflicting interests. It's how we do things at CUA whether at work, on leave (including leave without pay), or when representing CUA at external events or any event in connection with the workplace - always, without exception.

It's an exciting time to be with CUA. We've set ourselves an inspiring Purpose, and if we do it right we can transform the way Australian's think about banking. It will take each of us committing to deliver a life rich experience for our members, and each other, with ethics and integrity.

Your commitment to our CUA Ethics and Integrity in Practice is one of the main reasons why there's no place to work like CUA.

1.2 WHO NEEDS TO READ THIS DOCUMENT?

Our Ethics and Integrity in Practice applies to our entire CUA workforce across every area of our business - every CUA team member. We also share our way of working with our network of CUA partners and service providers, including our agents, brokers, consultants and introducers. We model this way of working at every opportunity, and we speak up when we see others going against it. This is our way of working - we all own it.

CUA provides training and access to all our Policies, Standards and Procedures but it's up to each of us to ensure we are aware and up to date on our policies and practices. If in doubt - ask!

Our Purpose: Members working together through life's changes for mutual good

Value & Descriptor

Core Competency

CARE

We are friendly, we respect and help our customers and each other



You genuinely matter to me

I embrace difference and diversity

I live the CUA Brand and Culture

CREATE

We create solutions, happiness and trust for our customers and each other



I take ownership and keep you updated

I innovate and embrace change for the future

I deliver business and risk focused outcomes

CONTRIBUTE

We contribute to family life, our organisation and our communities



You can trust me to get it right

I make decisions to sustain a better CUA

I enable a learning organisation

2. Our Community

2.1 OUR VALUES

Our shared values underpin every decision we make and enable us to enrich the lives of our members and each other. We share a passionate and genuine desire to make a difference.

2.2 OUR CORE COMPETENCIES

Our shared values translate into behaviours and competencies that describe how each of us behave every day. It's these competencies and behaviours that underpin how we measure and reward behaviour at CUA. We need a strong, vibrant business and an inspired, capable team that work together to deliver this.

2.3 OUR LIFE RICH SERVICE HEARTBEAT

Our life rich service heartbeat goes hand in hand with our mission and our shared values. It sums up how we work together every day to help our members enrich their lives. You can find our Service Heartbeat at the back of this booklet.

3. Our Workplace

3.1 SAFE WORK ENVIRONMENT

We all contribute to creating a safe and healthy place to work through our physical work environment, work practices and work culture. Together, we can create a workplace that supports each and every one of us in being physically and mentally healthy and well.

What does this mean for you?

You contribute to a healthy and safe workplace when you:

- Comply with all CUA Workplace Health and Safety (WH&S) policies, standards and procedures
- Attend all relevant WH&S training and ensure you are up-to-date with all relevant WH&S training requirements (including any refresher training completed annually, as required)
- Report and record all identified WH&S risks, hazards and incidents
- Participate in initiatives which focus on improving physical and/or mental health and well-being
- Seek help to manage your own mental and physical health when you need to and inform your leader if any health issues impact on your ability to carry out your role responsibilities.
- Work in a safe, responsible and effective way that not only ensures your own health and safety, but the health and safety of others.

3.2 RESPECT FOR CUA PROPERTY

We want to make sure you have the tools and resources you need to deliver our Purpose to our members and each other.

CUA property including intellectual property (IP) and resources exist to support us in delivering an exceptional member service experience. We all work together to ensure our CUA property and resources are used for the purposes for which they were provided, are treated with respect and care, and are secured against theft or misuse.

IP is a collection of intangible legal rights that allows the IP owner to do certain things to the exclusion of others. IP rights include confidential information, business and domain names.

What does this mean for you?

You show respect for CUA property (including intellectual property) and resources when:

- You are economical and avoid wasting resources (which is also great for our environment!)
- You use resources and property only for appropriate and/or legitimate CUA activities
- You undertake your duties in the most efficient and effective manner and with honesty and integrity
- You only use CUA property for non-CUA purposes when you have appropriate authorisation
- You maintain any CUA laptops, mobile phones, tablets printers or motor vehicles in excellent condition
- You ensure appropriate authorisation where there is a policy stating who can authorise

Can you use CUA computers and phones for personal use?

In general, CUA's computers and communication systems (including telephone facilities, fax, email, internet, social media and general stationery), are intended for business use only. However, we understand that sometimes you may need to use these tools for personal use. It's okay to use these tools for incidental personal use when:

- It doesn't interfere with the performance of your work duties
- It incurs minimal additional expense to CUA
- It is infrequent and brief
- It doesn't interfere with the performance of other CUA systems or our operations
- It doesn't violate any CUA policy or standard, or State or Federal law



Q: Is it okay for me to take home my CUA memory stick so I can use it for my studies as well?

A: No, not without prior approval from your Leader. Any books, records, manuals, lists, computer disks and files, and other information storage mediums that you use in your job are company property and the information they contain cannot be removed from company premises without prior Head of Department approval.

3.3 DIVERSITY AND DIFFERENCE

We embrace and value difference and diversity, and we actively promote a workplace that is inclusive, fair and respectful. We are proud of our diverse culture and we value difference in others. Every CUA member will experience our life rich service heartbeat in every interaction. All of our people will be treated fairly in recruitment and selection, promotion, career development, termination and compensation.

What is Unlawful Discrimination? Discrimination occurs when someone, or a group of people, is treated less favourably than another person or group because of their race, colour, national or ethnic origin; sex, pregnancy or marital status; age; disability; religion; sexual preference; trade union activity; or some other characteristic specified under anti-discrimination or human rights legislation. (Source: Australian Human Rights Commission)

What is Unlawful Harassment? Harassment occurs when someone is made to feel intimidated, insulted or humiliated because of their race, colour, national or ethnic origin; sex; disability; sexual preference; or some other characteristic specified under antidiscrimination or human rights legislation. It can also happen

if someone is working in a 'hostile' – or intimidating – environment. Harassment can include behaviour such as telling insulting jokes about particular groups, sending explicit or sexually suggestive emails, displaying offensive or pornographic posters or screen savers, making derogatory comments or taunts about someone's race or religion, and asking intrusive questions about someone's personal life, including their sex life. (Source: Australian Human Rights Commission)

Refer to our Anti-Discrimination and Diversity Standards for more information.

What does this mean for you?

You support difference and diversity when:

- You are considerate and inclusive of others in both the way you work and the language you use
- You consider others' perspectives in all interactions
- You show zero tolerance for unlawful discrimination, bullying, harassment and victimisation of any kind
- You speak to your leader (or People & Culture) if you have concerns that unlawful discrimination, bullying, harassment or victimisation could be happening to you or to another team member
- You make decisions that support a diverse workforce, and not based on individual differences
- You behave this way in all work-related forums, including external events



Q: You are recruiting a new mobile banker to join your team. You identify 'relationship building' as a critical capability for performing this role. From your personal experience, women are better at building relationships than men. You wonder if you can consider only female applicants for the role?

A: You can't reject the applications of males simply on the basis of sex, nor can you search only for female applicants. This would be unlawful discrimination on the basis of gender. Your search must be focused on the relevant knowledge, skills, abilities and experience required to perform the role. If relationship building skills are important, then recruit for these, as well as other relevant competencies and behaviours.



Q: One of my co-workers shares jokes with our team. Most of them are pretty funny, but I've noticed that sometimes he shares jokes about race and ethnic background. I find these offensive, and I'm quite sure a couple of my colleagues do too. What can I do?

A: It's really important that you speak up about this issue, for yourself and for your team. If you can, speak with him directly and let him know that you enjoy most of his jokes, but you find jokes relating to race and ethnic background offensive. If you don't feel comfortable speaking with him directly, or if you do and he doesn't stop making remarks, you should raise the matter with your leader or People & Culture.



Q: I feel really uncomfortable with the questions one of colleagues is asking me about my personal life, and the teasing associated with this. I think she is only trying to be friendly, but I don't wish to discuss my personal relationships with her. I really like her and don't want to lose our strong working relationship. What can I do?

A: It's important that you speak up rather than let this continue. Let her know that you enjoy working together, but that you don't feel comfortable discussing your personal life and personal relationships with her. If you don't feel comfortable speaking with her directly, or if the situation continues after you have spoken to her, you should raise the matter with your leader or People & Culture.

3.4 DRUGS AND ALCOHOL IN THE WORKPLACE

CUA maintains a zero tolerance to the use of illegal drugs.

CUA has zero tolerance to the consumption of alcohol when dealing with customers; driving a CUA vehicle or driving while on CUA business.

What does this mean for you?

Alcohol may be consumed at organised corporate events or other occasions with approval from your leader. However, if you are impaired in any way acting to the detriment of others or in breach of any other policy we will be uncompromising.

You must attend work in a condition to perform your role

3.5 COMMUNICATIONS AND INTERACTIONS WITH OTHERS

You genuinely matter to me. This is the message we send to our customers, our co-workers, our suppliers and other key stakeholders in our business through our friendly, caring and authentic way of making real connections.

What does this mean for you?

Just to be clear we have summarised a few key points.

- You act in a fair and equitable manner, especially in circumstances where you are responsible for leading or supervising others
- You act in a conscientious way and model our life rich service heartbeat at every opportunity
- You apply the principles of natural justice when making decisions that impact on the rights and interests of others
- You treat all other employees with respect and dignity, ensuring others are not mistreated or distracted from carrying out their duties
- You are aware that all forms of workplace harassment, sexual harassment and unlawful discrimination are not acceptable (Please refer to 3.3 Diversity and Difference for more information)
- You take all reasonable measures to ensure the safety, health and welfare in the workplace of yourself, your team members, our members and others
- You maintain confidentiality and respect the privacy of other team members
- You act with honesty and integrity, and you only represent CUA in the media if you are authorised to do so



- You dress in a clean, tidy and professional manner consistent with the CUA Dress and Grooming Standard (Please refer to our CUA Dress and Grooming Standard for further details)
- Your communications (electronic, through social media, phone and face to face) with work colleagues, customers, suppliers and other key stakeholders are refreshingly genuine and professional, and you provide information that complies with our policies, standards and legislative requirements (Please refer to our Social Media policy for more information)

CUA conduct business purely on the basis of quality, price and service. You need to be careful not to provide any information that is false, incomplete or misleading. In addition, you must not offer any business courtesies in exchange for obtaining favourable treatment or advantage.

Important: CUA does not support business courtesies such as entertainment, meals, transportation or accommodation that could compromise the business relationship with our customers or other companies.



Q: Can I invite clients to a corporate event as part of my business development activities?

A: Business courtesies such as corporate entertainment are acceptable where **a)** you have the authority to entertain for business purposes, and **b)** where the business courtesy is for genuine business development purposes. Make sure you speak with your leader if you have any doubts about what is acceptable.



4. Our Business Practices

4.1 COMPLIANCE WITH LAWS, REGULATIONS, POLICIES AND PROCEDURES

At CUA, we commit to comply with all relevant State and Federal laws and regulations, our industry code, and all of our internal policies, standards and procedures. We do the right thing – everytime.

What does this mean for you?

We all need to fulfil all reasonable, lawful instructions related to our duties. You may question or object to an instruction if you believe:

- Complying with the instruction will result in a serious or significant consequence including, but not limited to, an immediate risk of injury or illness, or damage to property
- As a matter of conscience that you will be unable to carry out the instructions. E.g. a person is instructed to work on a traditional religious holiday
- The instruction is unreasonable because it goes beyond what is appropriate in the circumstances
- The instruction involves actions which you consider are unlawful

If you object to an instruction for any of the reasons mentioned, you should communicate this to the person giving the direction, if that is reasonable. You can also speak with your Senior Manager and/or People & Culture if you still have concerns.

What should you do if you suspect someone has broken the law, violated our industry code or breached our internal policies and procedures?

If you suspect a violation of our policies, procedures, regulations, standards or laws, you must notify your leader and/or Senior Manager (or the Chief People Officer if it is not appropriate for you to notify your Senior Manager). If serious misconduct or criminal activity is suspected, then our CEO should also be informed. At CUA, we support a safe environment to raise issues and events, either through management or through our Whistleblower program (Please refer to the Whistleblower Procedure for further details).

Importantly, we want to know and we are here to support you.

What is COBCOP?

CUA belongs to the Customer Owned Banking Association (COBA) and we subscribe to the Customer Owned Banking Code of Practice (COBCOP). This code establishes higher standards than the law requires in a range of areas and addresses issues not covered in legislation. In adopting COBCOP, CUA voluntarily agree to abide by the additional higher standards and requirements set out in the code. In other words, we commit to going above and beyond for our customers and for each other.

What does this mean for you?

The following COBCOP principles apply to the daily interactions of all our people – with our customers, with each other, and with suppliers, contractors and other third parties:

1. Be fair and ethical in our dealings with you
2. Focus on our customers
3. Give you clear information about our products and services
4. Be responsible lenders
5. Deliver high customer service and standards
6. Deal fairly with any complaints
7. Recognise our customers' rights as owners
8. Comply with our legal and industry obligations
9. Recognise our impact on the wider community
10. Support and promote the Customer Owned Banking Code of Practice.

Our Commitment: We take our commitment to these principles seriously. Breaches of the COBCOP may harm our reputation and our business. It may also result in regulatory action being taken against CUA. Consequently, breaches will not be tolerated and may result in disciplinary action including termination of employment. As a key player in the mutual industry and an active contributor in the world movement, how we do business is very important – to our customers, our people and our industry.



Q: What can I do if I'm concerned someone I work with may have breached the COBCOP principles?

A: Talk to your leader in the first instance – it's very important that you share your concerns. If need be, you can also speak with your Leader or People & Culture. We want to know and we are here to support you.

4.2 TRANSACTIONS ON ACCOUNTS AND THIRD PARTY PRODUCTS

We conduct all transactions in line with our CUA policies, standards and procedures, and our account terms and conditions, as they provide the rules that enable us to run our business effectively and efficiently.


What does this mean for you?


Quite simply, this means we all comply with our CUA policies, standards and procedures, along with account terms and conditions, to deliver our service with integrity.

So what do you particularly need to keep an eye out for?

- You must not process transactions or fees reversals associated with your own accounts, family or friends
- You must not adjust or reverse loan repayments made to accounts related to you, your friends and family
- You must not adjust interest on your accounts, or those for family and friends

- All of the above apply equally to work colleagues, if in doubt speak to your leader
- As an employee of a financial services institution, we have an expectation of responsible borrowing
- If you find yourself in personal financial hardship, we are here to help. Please speak to your Leader, People & Culture or Member Operations.

 **Important:** We treat all unauthorised activity and false, misleading or fraudulent transactions extremely seriously and all suspected instances will be investigated. If you suspect or detect any illegal, fraudulent or unauthorised activity, we need you to report it immediately to the Fraud team or you can pass on the information via CUA's Whistleblower program (Please refer to the Whistleblower Procedure for further details). Any information reported to the Fraud team or through the Whistleblower program will be treated in the strictest confidence.

 **Q: Can I process transactions on my husband's account?**
 A: This would be a conflict of interest (see 4.5 Conflict of Interest), so you need to allow another team member to manage these transactions.

4.3 CONFIDENTIAL INFORMATION

Trust is important in all of our relationships and maintaining confidentiality of information is a key factor in demonstrating the integrity we are renowned for. We are entrusted with confidential information every day and we always treat this information with care.

What is Confidential Information?

Confidential information means any non-public information, including intellectual property, that is connected with, or relating to, the business, operations and functions of CUA, including:

- Information relating to our financial situation
- All information relating to our customers
- Information relating to the strategies, internal management, structure, employees, policies and practices of our business
- Information disclosed or communicated by a third party to a CUA employee in the course of their duties with CUA.

What does this mean for you?

You maintain confidentiality when:

- You use confidential information only for the purpose intended
- You ensure that you do not disclose confidential information received to another person or organisation, without appropriate approval
- You show the same respect for any sensitive or confidential information generated, originated or developed by CUA - that is, you don't divulge this to anyone inside or outside the organisation without prior Executive approval
- You ensure your work area is cleared of sensitive and confidential business information each evening

- You only access information that is required as part of your role
- You contribute to ensuring after-hours access to work areas containing confidential information or processes is controlled
- You ensure confidentiality of company and customer information is maintained at all times.

4.4 GIFTS AND GRATUITIES

At CUA, we cultivate relationships built on trust, care and mutual respect. Occasionally, our business partners or customers may wish to show their appreciation for our important work through gifts or gratuities. It's our good judgment and respectful responses in these situations that shows our true integrity.

What does this mean for you?

We don't want you to be placed in a situation where a conflict of interest may arise. With that in mind, you should never accept a gift, benefit or prize from suppliers, agencies or customers, which in frequency or in nature, exceeds normal business courtesy and practices. You should decline a gift, benefit or prize that may:


- Compromise your judgement
- Create a conflict of interest
- Damage relationships with others
- Indicate any favouritism or prejudice towards a person or group of people


You may accept a gift or gratuity when:


- The gift has a nominal value
- It is absolutely clear as a result of receiving the gift you have no obligation to provide favourable or differential treatment

What about giving or receiving gifts of cash or loans?

- Under no circumstances should a gift of cash or by way of a loan be solicited or accepted
- Under no circumstances must gifts of cash or cash equivalent be given as an outward gift to any party.

 **Important:** Please refer to the Gifts Policy to identify whether a gift is considered a nominal or reportable gift. If you are still uncertain as to whether you can accept a gift, benefit or prize, ask your leader or People & Culture for advice.

 **Q: One of our suppliers has invited me to their corporate box at the football, with other clients attending. Is it okay for me to go?**
 A: It depends. Invitations to entertainment should be declined a) immediately prior to or during contract negotiations and selection processes, or b) if CUA is engaged or likely to enter into a dispute with that organisation. Check with your leader prior to responding.

 **Q: I attended an industry event as a representative of CUA, and I won the lucky door prize! Can I keep this?**
 A: A prize won at a function for which CUA has paid or has endorsed attendance must be reported. The decision regarding whether a prize may be retained by the employee will be at the discretion of the employee's Senior Manager.



Q: One of my customers has provided me with a generous gift, which he says is to thank me for my hard work. I want to decline the gift, but I'm worried I might offend him?

A: When declining a gift or gratuity, firstly express gratitude for the gift and politely decline. You should explain that in declining the gift you are complying with our CUA Ethics and Integrity in Practice. Depending on what the gift is, it may also be important to let your leader know about the gift and your response.

4.5 CONFLICT OF INTEREST

We value trust, honesty and integrity in all our relationships. We ensure business decisions are made in the best interests of our customers and our people, not based on any personal interests.

What does this mean for you?

The potential for conflicts of interest arise from time-to-time, and that's not a problem. However, it's important that you can:

- Recognise any potential conflict of interest
- Avoid participating in any decision or activity where there is a potential conflict of interest
- Provide transparent and open disclosure to your leader and/or other parties.

What situations does a conflict of interest occur in?

A possible conflict of interest arises when you or a member of your family has a direct or indirect interest (or employment) in an entity which is dealing with CUA or with a direct competitor. This may take many different forms, but here are a few examples:

- Decisions regarding suppliers, customers and other parties who do business with CUA
- A business or close personal relationship with one of our direct competitors
- Decisions regarding the appointment or promotion of a team member where a personal or private relationship exists
- Decisions or dealings with a potential customer where a personal or private relationship exists
- Holding directorships, executive positions, shareholdings or ownership of other companies, organisations or businesses that conduct business with CUA
- Submission and/or approval of a loan to parties where there is a close personal relationship
- Acceptance of benefits (e.g. gifts, entertainment, travel, accommodation expenses, hospitality, etc.) from customer, staff and suppliers. (Please refer to 4.4 Gifts and Gratuities and/or our Gift Policy for further guidance)
- Personal use of CUA documents and information obtained in the course of employment
- Secondary employment if it relates to our business, conflicts with our business or its values, is in direct competition with our business or utilises CUA intellectual property in any way (always advise your leader and/or People & Culture of any secondary employment so they can discuss any potential conflict of interest with you)
- Using intellectual property belonging to CUA for personal benefit
- Use of CUA facilities, equipment or business intelligence for personal benefit or for the benefit of a third party.



Important: If you are in doubt about whether a conflict of interest exists, you should discuss the matter with your leader or People & Culture.



Q: My brother-in-law owns the cleaning company we are currently considering as part of a tender process. I'm quite sure I can remain impartial, as we are not very close. Is it okay if I remain on the selection panel?

A: This is not a decision you can make yourself. You need to provide transparent and open disclosure to your leader and the other members of the selection panel. They may decide it is in the best interests of both parties for you to step down from the panel in this instance.



Q: One of the Mums from my son's school came into our branch the other day and asked me to process a loan for her. Should I do this?

A: It depends on your relationships with this customer, but at the very least you should identify that you both belong to the same school community and offer her the option of working with another team member to meet her loan needs. If you are friends, it would not be appropriate for you to process her loan.



5. Whistleblower Program: Speaking Up with Integrity

We know that actions speak louder than words. That's why we strongly encourage you to speak up about any serious concerns you may have, either to your leader or through People & Culture or through our Whistleblower Program.

What does this mean for you?

We want to hear about any serious concerns you have so our commitment to you includes:

- You will never be personally disadvantaged by having made a report
- You may wish to remain anonymous and we guarantee we will protect your identity to the extent of the law
- You will be listened to
- Your concerns will be taken seriously

See our Whistleblower Procedure for more information on how to report a concern.

What do I need to report?

Reportable conduct includes behaviour which you believe is:

- Dishonest
- Fraudulent
- Corrupt
- Illegal
- In breach of government legislation or COBCOP
- Unethical
- An unsafe work practice



Q: I've heard stories of people being whistleblowers in other organisations, then being demoted or losing their jobs for speaking up. Should I be concerned about this?

A: No. We commit to providing a safe environment for you to speak up. You will not be personally disadvantaged by making a report.

6. Adherence to our CUA Ethics and Integrity in Practice

At CUA, we adhere to all principles and standards outlined in the CUA Ethics and Integrity in Practice. It's how we do things around here.

In the best interests of our customers and our people, we are committed to ensuring these principles and standards are lived across our business - by every team member, every day. Employees not adhering to these principles and standards will be counselled in accordance with CUA's Performance Improvement procedure.

Should you require further assistance regarding the CUA Ethics and Integrity in Practice, please contact your leader or People & Culture.



Our Life Rich Service Heartbeat



I care, I create,
I contribute by
showing why:

You
genuinely
matter
to me.

Because you want
me to treat you as
an individual and
understand your
needs.

You value personal
service, and come
to us to escape
being treated
as a number.

I take
ownership
and keep
you updated.

Because you want
me to own your story.

You want me to look out
for your best interests
and proactively find new
ways to help you.

Regular communication
is important to you,
and you expect me to
keep you updated at key
points in your journey.

You can
trust me
to get it
right.

Because you
want the right
solution, delivered
with confidence
and in a style that
suits you.

For more information on our policies and procedures,
please visit the [People & Culture](#) page on Infocentral

Contact People & Culture on **07 3552 4375**, extension **4375**
or email hr.enquiries@cua.com.au

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