

FIT AND PROPER AND FINANCIAL ACCOUNTABILTY REGIME POLICY

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Ukrainian Credit Co-operative Ltd

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1 Introduction

Primary responsibility for ensuring the fitness and propriety of individuals holding responsible officer and accountable person positions within the Co-operative rests with the Co-operative's Board. As a result, the Board has adopted this Policy to "manage the risk to its business or financial standing" that persons acting in responsible officer and accountable person positions are fit and proper".

To achieve this objective, this Fit and Proper Policy sets out:

1. how the Board will ensure responsible officer and accountable persons are competent and act with honesty and integrity;
2. the matters the Co-operative will consider in determining if a person is fit and proper for a responsible officer and accountable person position;
3. the processes that will be followed by the Co-operative in assessing whether a responsible officer and accountable person is fit and proper;
4. the actions the Co-operative will take if it is not satisfied that a person is fit and proper for a responsible officer and accountable person position; and
5. is the approved list of responsible officers and accountable persons and the competency matrix as determined by the Co-operative in complying with its Fit & Proper and Financial Accountability Regime Policy in appendix A.

1.1 Prudential Regulation

Prudential Standards CPS 520 and associated Guidance Notes

1.2 Financial Accountability Regime (FAR)

The Financial Accountability Regime (FAR) imposes a strengthened responsibility and accountability framework for entities in the banking, insurance and superannuation industries and their directors and senior executives. The FAR is designed to improve the risk and governance cultures of Australia's financial institutions.

The FAR replaces the Banking Executive Accountability Regime (BEAR), which commenced in 2018, and is jointly administered by APRA and ASIC. The FAR as it applies to authorised deposit-taking institutions (ADIs) and their authorised non-operating holding companies (NOHCs) commenced on 15 March 2024.

The purpose of the FAR is to establish clear and heightened expectations of accountability for Directors and senior Executives of ADI's (Accountable Persons). FAR also sets out key obligations which must be met by ADIs and its Accountable Persons and the consequences where these obligations are not met. A key objective of FAR is therefore to improve the operating culture of ADIs by increasing transparency and accountability across the banking sector.

1.3 Board Authority

The Board of Directors (the Board) originally adopted this policy statement on 20th Sept 2006, the latest approved version detailed in the Dnister Policy Register located in the GRC Triline Risk and Compliance management system.

1.4 Reviews

The Board reviews and amends this policy, at least annually or more often should major changes occur during the period. A history of review of this policy and extent of recommended and ratified changes are Detailed in Schedule 1.

2 Application of this Policy

This policy applies the Co-operative, its responsible officers, and accountable persons and (as applicable) all employees (including contractors and sub-contractors) of the Co-operative. A responsible officer / Accountable Person is:

- all Directors of the Board of Dnister;
- individuals with actual or effective senior Executive responsibility for management or control of a significant or substantial part or aspect of the operations of Dnister; and
- individuals with senior Executive responsibility for one of the critical operations specified in the Act.

Definitions of the Fit & Proper positions, as well as a complete definition of a responsible officer / accountable person, are contained in chapter 12 definitions.

The Co-operative will maintain a current schedule of responsible officers and accountable persons and details of the competencies and training required for each position.

Section 1 Financial Accountability Regime

3 FAR Policy Statement

The Co-operative is committed to implementing and complying with its obligations under the FAR including the accountability, remuneration, key personnel and notification obligations under the FAR and the aspects covered in this and associated Policies.

Accountable Persons of the Co-operative must comply with their accountability obligations under the FAR in the context of their particular responsibilities, as outlined in their Accountability Statement. Where an Accountable Person delegates their responsibilities, they are solely responsible for ensuring that their employees and direct reports comply with the FAR obligations including (but not limited to) ensuring that appropriate arrangements, systems, and controls are in place to support their and the Co-operative's, ongoing compliance with the FAR obligations.

Where a senior executive holds a position, which meets the criteria of an Accountable Person as defined by the FAR, the Co-operative will ensure the relevant senior executive is appointed as an Accountable Person in accordance with the FAR.

The key obligations under the FAR are to ensure that the Co-operative and its Accountable Persons:

- act with honesty, integrity and with due skill, care, and diligence;
- deal with APRA and ASIC in a way which is open, constructive, and cooperative; and
- prevent matters from arising which impact the prudential standing or prudential reputation of the Co-operative.

While the FAR imposes specific obligations on the Co-operative and its Accountable Persons, all employees must act in a manner which is consistent with these obligations.

A more detailed summary of the FAR obligations is set out in section 3.3 of this Policy.

3.1 Consequence of non-compliance

Serious consequences apply for noncompliance with the FAR. In addition to existing informal and formal powers which can be used by APRA and ASIC in implementing the FAR, the following specific consequences may also apply:

3.1.1 Penalties

Non-compliance with FAR obligations where the contravention “relates to prudential matter”¹ attracts serious penalties for the Co-operative as follows:

[If medium sized organisation]

- 250,000 penalty units .

[If small sized organisation]

- 50,000 penalty units .

3.1.2 Disqualification

In addition to financial penalties which may be applied against the Co-operative, APRA and / or ASIC can disqualify an Accountable Person if that person:

- has not complied with his or her accountability obligations; and
- having regard to the seriousness of the non-compliance, the disqualification is justified.

¹ Section 37G

Also, if the Co-operative allows a disqualified person to act as an Accountable Person it will commit a strict liability offence and be liable for a penalty of 60 penalty units . In addition, it may also have committed a fault-based offence and be liable for a penalty of up to 250 penalty units .

Accordingly, if an Accountable Person is disqualified by APRA and / or ASIC, they will not be permitted to be an Accountable Person for the Co-operative which may result in a breach of their employment contract and could result in termination of their employment with the Co-operative.

3.1.3 The Co-operative's Consequences

A breach of the FAR obligations will be taken seriously by the Co-operative. Therefore, in addition to any consequences which may be applied by APRA and / or ASIC for non-compliance with the FAR obligations, relevant employees of the co-operative, who do not comply with their FAR obligations or who have willingly or materially, contributed to or caused, a breach of the Co-operative's FAR obligations, will be subject to disciplinary action being taken by it, in accordance with its Employee Handbook PER-001 and which may include the termination of their employment with the Co-operative.

3.2 FAR Compliance Framework

The FAR controls which have been directly established by the Co-operative to implement the FAR consist of the following key measures:

- **this FAR Policy** – *sets out the Co-operative's commitment to complying with the FAR and how FAR obligations have been implemented;*
- **the Co-operative's Accountability Map;**
- **Accountability Statements** for each Accountable Person of the Co-operative;
- **Corporate Governance Charter Section 5 Remuneration** – *prescribes the minimum standards which must be applied when developing the remuneration and reward structure to ensure positive conduct and behaviour outcomes are achieved;*
- **FAR Training Program** – *ensures Directors, senior executives and employees of the Co-operative understand the FAR and FAR obligations;*
- **Incidents Management Framework (Breach Reporting)** – *the framework for identifying and assessing incidents and in particular, sets out the process for identifying and assessing whether there has been a breach of FAR obligations and reporting obligations for FAR breaches;*

In addition to the above controls there are several measures which are in place to support ongoing compliance with the FAR obligations such as the Co-operative's Governance Framework, Risk Management Framework and Compliance Management Framework. These controls play an integral role in supporting the effective implementation of the FAR and FAR obligations. Further detail regarding the controls which relate to each FAR obligation are provided in section 3.3 below.

3.3 FAR Obligations

The FAR sets out accountability obligations and operational obligations which apply to the Co-operative, Accountable Persons and (as applicable) its employees. The obligations are both systemic and prudential in nature. The obligations and key measures which are put in place by the Co-operative to comply with these obligations are summarised below:

3.3.1 Reasonable Steps

Several FAR obligations impose a standard of 'reasonable steps' to be taken by the Co-operative and/or each Accountable Person to comply with the obligation.

Reasonable steps in relation to a matter include (but are not limited to):

- appropriate governance, control, and risk management in relation to that matter;
- safeguards against inappropriate delegations of responsibility in relation to that matter; and
- appropriate procedures for identifying and remediating problems that arise or may arise in relation to that matter.

3.3.2 Accountability Obligations

Obligation	Comments/Interpretation	Application	Dnister Measure
The Co-operative must conduct its business with honesty and integrity, and with due skill, care, and diligence	<p>The Co-operative must take reasonable steps to conduct its business with honesty, integrity, due skill, care and diligence.</p> <p>The terms “honesty”, “integrity”, “due skill” and “diligence” are not defined under the FAR and therefore should be interpreted in accordance with their ordinary meaning or established legal interpretation (as applicable).</p>	Dnister Ukrainian Credit Co-operative Limited	Fit and Proper and FAR Policy Employee Handbook Employee Due Diligence Policy Compliance Management Framework Policy Risk Management Framework Policy Corporate Governance Policy
Each Accountable Person must act with honesty and integrity, and with due skill, care, and diligence	<p>This is an absolute obligation for each Accountable Person to act with honesty, integrity, due skill, care and diligence.</p> <p>The terms “honesty”, “integrity”, “due skill” and “diligence” are not defined under the FAR and therefore should be interpreted in accordance with their ordinary meaning or established legal interpretation (as applicable).</p>	Each Accountable Person	Fit and Proper and FAR Policy, Employee Handbook Employee Due Diligence Policy Conflicts of Interest Policy
The Co-operative must deal with the regulators in an open, constructive, and cooperative way	<p>The Co-operative must take reasonable steps to deal with APRA and ASIC in an open, constructive and cooperative way.</p> <p>The terms “open”, “constructive” and “cooperative” are not defined under the FAR and therefore should be interpreted in accordance with their ordinary meaning or established legal interpretation (as applicable).</p>	Dnister Ukrainian Credit Co-operative Limited	Fit and Proper and FAR Policy, Compliance Management Framework Policy, Risk Management Framework Policy, Corporate Governance Policy and Breach Reporting Policy
Each Accountable Person must deal with the regulators in an open, constructive, and cooperative way	<p>This is an absolute obligation for each Accountable Person to deal with APRA and ASIC in an open, constructive, and cooperative way.</p> <p>The terms “open”, “constructive” and “cooperative” are not defined under the FAR and therefore should be interpreted in accordance with their ordinary meaning or established legal interpretation (as applicable).</p>	Accountable Persons	Fit and Proper and FAR Policy, Compliance Management Framework Policy, Risk Management Framework Policy, Corporate Governance Policy and Breach Reporting Policy
In conducting its business, the Co-operative must prevent matters from arising that would adversely affect the Co-operative’s prudential standing or prudential reputation	<p>The Co-operative must take reasonable steps to prevent matters from arising that adversely affect the prudential standing of the Co-operative.</p>	Dnister Ukrainian Credit Co-operative Limited	Fit and Proper and FAR Policy, Compliance Management Policy, Risk Management Policies, Corporate Governance Policy, Breach Reporting Policy and Conflicts of Interest Policy
In conducting their responsibilities, Accountable Persons must prevent matters from arising that would adversely affect the prudential standing or	<p>Each Accountable Person must take reasonable steps to prevent matters from arising that adversely affect the prudential standing of the Co-operative. The Accountable Person (as applicable) will be taken to have met this obligation if they can establish, they have taken reasonable steps.</p>	Accountable Persons	<i>[Insert relevant measures E.g.]</i> <i>Business Unit Risk/Compliance Plans</i> <i>Business Unit Monitoring and Supervision</i>

Obligation	Comments/Interpretation	Application	Dnister Measure
prudential reputation of the Co-operative.			<i>Business Unit delegations' frameworks</i> <i>Business Unit Risk and Compliance Procedures]</i>
Ensure that each of its Accountable Persons meets his or her accountability obligations.	The Co-operative must take reasonable steps to ensure each Accountable Person: <ul style="list-style-type: none"> acts with honesty and integrity and with due skill, care, and diligence; deals with APRA and ASIC in an open, constructive, and cooperative way; and takes reasonable steps in conducting those responsibilities to prevent matters from arising that would adversely affect the prudential standing or prudential reputation of the Co-operative. 	Dnister Ukrainian Credit Co-operative Limited	Fit and Proper and FAR Policy, Compliance Management Policy, Risk Management Policy, Corporate Governance Policy, Breach Reporting Policy and Conflicts of interest Policy

3.3.3 Key Personnel Obligations

Obligation	Comments/Interpretation	Application	[Insert ADI Name] Measure
Key personnel obligations	The Co-operative must: a) Ensure that the responsibilities of its Accountable Persons cover all parts or aspects of the operations of the Co-operative and specific responsibilities as prescribed by the FAR; b) Ensure that each Accountable Person is registered; c) Ensure that none of its Accountable Persons have been disqualified; and d) Comply with any direction from APRA and ASIC to reallocate Accountable Person responsibilities;	Dnister Ukrainian Credit Co-operative Limited	FAR Policy Accountability Map Accountability Statements

3.3.4 Registrations and Notifications

Obligation	Comments/Interpretation	Application	[Insert ADI Name] Measure
All Accountable Persons must be registered with APRA and ASIC within the prescribed timeframes	<ul style="list-style-type: none"> If a new Accountable Person is to be appointed into a permanent position, the Accountable Person must be registered at least 21 days prior to the individual commencing as an Accountable Person; If an Accountable Person is to be appointed into a temporary position for 28 days or more, the Accountable Person must be registered 21 days before they commence (if it is known the period will exceed 28 days) or in any case 	Accountable Persons	Fit and Proper and FAR Policy – Section 3.7 below

Obligation	Comments/Interpretation	Application	[Insert ADI Name] Measure
	<p>at least 21 days before the role exceeds 28 days;</p> <ul style="list-style-type: none"> • Must be in the approved form as prescribed by the regulators and at a minimum must include: <ul style="list-style-type: none"> ➤ a completed registration nomination form; ➤ the Accountability Statement nomination form for the Accountable Person; and ➤ a signed declaration that the ADI is satisfied that the person is suitable to be an Accountable Person which is made by the Chair of the relevant Board committee, or a person delegated to sign on the board's behalf. 		
Notification requirement - Changes to Accountable Persons must be notified to the regulators within the prescribed timeframe	<ul style="list-style-type: none"> • Changes to Accountable Persons must be notified to the regulators within 21 days where: <ul style="list-style-type: none"> ➤ the person ceases to be an Accountable Person; ➤ an Accountable Person has been dismissed or suspended due to a failure to comply with his or her accountability obligations. • The notification must include an updated registration form. 	Dnister Ukrainian Credit Co-operative Limited CRO or CFO	Fit and Proper and FAR Policy – section 3.8 below
Notification requirement - Changes to Accountability Map must be notified to the regulators within the prescribed timeframe	<ul style="list-style-type: none"> • Must be notified to the regulators within 21 days of the change. • 	<i>Dnister Ukrainian Credit Co-operative Limited CRO or CFO</i>	Fit and Proper and FAR Policy – section 3.8 below
Notification requirement - Changes to Accountability Statements must be notified to the regulators within the prescribed timeframe	<ul style="list-style-type: none"> • Must be notified to the regulators within 21 days of the change. • 	Dnister Ukrainian Credit Co-operative Limited CRO or CFO	Fit and Proper and FAR Policy – section 3.8 below
Notification requirement - Changes to Remuneration must be notified to the regulators within the prescribed timeframe	Changes to remuneration of an Accountable Person must be notified within 21 days after variable remuneration has been reduced due to a failure to comply with the accountability obligations.	Dnister Ukrainian Credit Co-operative Limited CRO or CFO	Fit and Proper and FAR Policy – section 3.8 below Corporate Governance Charter – Section 5 Remuneration
Notification requirement - Breaches of accountability obligations must be notified to the regulators within the prescribed timeframe	Must be notified within 21 days after becoming aware of a breach of accountability obligations by the ADI or by an Accountable Person.	Dnister Ukrainian Credit Co-operative Limited CRO or CFO	Fit and Proper and FAR Policy – section 3.8 below <i>Breach Reporting Policy]</i>

3.3.5 Remuneration

Obligation	Comments/Interpretation	Application	[Insert ADI Name] Measure
Any variable remuneration relating to an Accountable Person must be deferred in accordance with the amount and period prescribed by the FAR	<p>The variable remuneration obligation applies to variable remuneration which is greater than \$50,000 for a financial year.</p> <p>In addition to deferral of remuneration the Co-operative must maintain a Remuneration Policy that complies with the FAR.</p>	<p>Dnister Ukrainian Credit Co-operative Limited</p> <p>Accountable Persons</p>	<p>Fit and Proper and FAR Policy –</p> <p>Corporate Governance Charter section 5 Remuneration</p>

3.4 FAR Roles and Responsibilities

The following roles and responsibilities apply to implementation and oversight of the Co-operative:

Accountable Persons	<p>Accountable Persons are responsible for:</p> <ul style="list-style-type: none"> • complying with the FAR obligations; • ensuring breaches of FAR obligations are reviewed, assessed and reported in accordance with the Breach Reporting Policy; • reviewing and approving the content of their Accountability Statement; • holding an up to date copy of their Accountability Statement in their personal records; • maintaining their Accountability Statement and advising the CRO / CFO if their responsibilities change and/or the Accountability Statement otherwise requires amendment; • fulfilling the responsibilities which are set out in their Accountability Statement, having regard to the FAR obligations and in particular, the reasonable steps requirement.
Employees (including contractors and sub-contractors)	<p>Employees are responsible for:</p> <ul style="list-style-type: none"> • ensuring they act in accordance with the scope and authority of delegations and instructions as directed by any Accountable Person or the Co-operative; and • immediately reporting incidents and breaches in accordance with the Breach Reporting Policy.
Human Resources (Appointment of Staff)	<p>Human Resources are responsible for advising the CRO / CFO of the following:</p> <ul style="list-style-type: none"> • all registrations and notifications to the regulators, as required under the FAR obligations, which pertain to Accountable Persons, Accountability Statements and/or the Accountability Map; • ensuring that any new director, executive or other senior manager who is appointed by the Co-operative is assessed to determine whether they fall within the definition of an Accountable Person and if so that the recruitment and appointment of the Accountable Person is consistent with their fit and proper requirements and that the person is otherwise suitable to be appointed as an Accountable Person; • ensuring all new Accountable Persons are registered with the regulators as an Accountable Person before they commence in their role with the Co-operative and in any case at least 21 days prior to commencement as an Accountable Person; • developing the Accountability Map for the Co-operative and developing and Accountability Statements for each Accountable Person; • maintaining the Accountability Map and ensuring that any updates to the Map are provided to the regulators within 21 days after any change; • maintaining a register of Accountable Persons and their Accountability Statements and ensuring that any updates to Accountability Statements are notified to the regulators within 21 days after any change; • notifying the regulators within 21 days of the following changes:

	<ul style="list-style-type: none"> ○ an individual ceasing to be an Accountable Person; ○ becoming aware of a breach of accountability obligations by the ADI or an Accountable Person; ○ a reduction in variable remuneration or the dismissal or suspension of an Accountable Person because he or she has failed to comply with their accountability obligations. <ul style="list-style-type: none"> ● ensuring there is a remuneration policy in place which is compliant with the FAR; ● maintaining and implementing this Fit and Proper and FAR Policy; ● approving non-material changes to this Fit and Proper and FAR Policy.
Risk and Compliance	<p>Risk & Compliance are responsible for:</p> <ul style="list-style-type: none"> ● independent advice on FAR obligations or the steps required by the Co-operative or Accountable Persons to comply with the FAR obligations; ● oversight of implementation of this Fit and Proper and FAR Policy and compliance with FAR obligations; ● assessment of incidents and breaches to determine if there is a breach of FAR obligations and if so, ensuring that the breach is reported in accordance with these obligations.
Board	Approving this Fit and proper and FAR Policy and any subsequent material amendments.

3.5 Record Keeping

All records which are held in relation to compliance with this Fit and Proper and FAR Policy and in particular the FAR obligations should be kept in accordance with the Co-operative's Record Keeping Policy (COBA record keeping policy).

Each Accountable Person should keep records of their Accountability Statement and appropriate records to evidence compliance with performance of their responsibilities and the FAR obligations, in particular, records in relation to:

- key decisions pertaining to their responsibilities;
- meetings relating to key decisions or prudential matters (E.g. records such as meeting agendas, reports, minutes, action logs);
- delegations to or from the Accountable Person;
- organisational changes and the basis for any decisions in relation to these changes; and
- general management oversight.

The Chief Risk Officer must ensure records are kept of the following key documents relating to FAR registration and notifications:

- the Accountability Map;
- Accountability Statements;
- a register of all current and previous Accountable Persons;
- notifications to the regulators in relation to the Co-operative's Accountability Map, Accountability Statements and/or Accountable Persons.

Records relating to any notification to APRA of a breach of FAR Obligations will be held by the Chief Risk Officer.

3.6 FAR Definitions and Abbreviations

Term	Definition
Accountability Map	The document which has been created by the Co-operative in accordance with section 34 of the FAR Act 2023 that shows how the responsibilities of Accountable Persons together cover all parts or aspects of the Co-operative's operations.
Accountability Statement	A formal written statement developed for each Accountable Person which complies with section 31 (2) (a) and 33 of the FAR Act 2023 that details the parts or aspects of the Co-operative's operations for which the Accountable Person is accountable.
Accountable Person	A person, including a director, executive or senior manager, that falls within the definition of section 10 (1) 10 (6) of the FAR Act 2023 and is therefore an Accountable Person for the Co-operative.

	<p>The general principle for an Accountable Person under the Act is a person who has actual or effective senior executive responsibility for management or control of the Co-operative, or a substantial part of the operations of the Co-operative.</p> <p>In accordance with the regime, any person at the Co-operative must be an Accountable Person if they fall into the following classes of Accountable Persons:</p> <ul style="list-style-type: none"> • all directors of the board of Dnister Ukrainian Credit Co-operative Limited' • individuals with actual or effective senior executive responsibility for management or control of a significant or substantial part of aspect of the operations of the Co-operative; and / or • individuals which senior executive responsibility for one of the responsibilities specified in the Act.
Act	FAR Act 2023
ADI	Authorised Deposit-Taking Institution
APRA	The Australian Prudential Regulation Authority (joint regulator)
ASIC	The Australian Securities and Investment Commission (joint regulator)
FAR	The Financial Accountability Regime as set out in FAR Act 2023
Prudential Standing/Prudential Reputation	Those matters which materially impact on the Co-operative's financial position and overall conduct of the Co-operative's affairs with integrity, prudence, and professional skill.

3.7 – New Accountable Person Registration

Registration of New Accountable Persons Instruction

The Co-operative is required to register new Accountable Persons with the regulators **21 days before** the nominated Accountable Person commences as an Accountable Person. The following steps should be followed when registering a nominated Accountable Person with the regulators:

- a) Assess the skills, background, and capability in accordance within this Fit and Proper and FAR Policy and applicable criteria for the position;
- b) Draft an Accountability Statement applying the Accountability Statement template utilised by the Co-operative and which is tailored for the Accountable Person's responsibilities;
- c) Review Accountability Statements of other Accountable Persons and the Accountability Map to ensure there are no consequential changes required to existing Accountability Statements and to verify changes required to the Accountability Map;
- d) Provide the draft Accountability Statement to the nominated Accountable Person for review and signing;
- e) Amend and update the Accountability Map for the Co-operative;
- f) Register the new Accountable Person with the regulators **21 days before** the appointment of the Accountable Person or at a minimum, **21 days before** the Accountable Person commences in their role² including notification of the following documents:
 - Completed registration form in the format prescribed by the regulators from time to time;
 - Declaration that the ADI is satisfied that the person is suitable to be an Accountable Person in the format prescribed by the regulators from time to time and signed by the Chair of the Board or their delegate;
 - the Accountability Statement form nomination for the nominated Accountable Person;
- g) Notify the regulators **within 21 days after** the change of any:
 - Updated Accountability Map – i.e. to the extent any consequential changes are required to reflect the new Accountable Person (**refer to Notifications – section 3.8 below**);
 - Updated Accountability Statements notifications of other Accountable Persons – i.e. to the extent any consequential changes are required to reflect the new Accountable Person – (**refer to Notifications – section 3.8 below**).

3.8–Notifications

As the Co-operative is considered as a Non SFI, there are reduced reporting obligations applicable. The co-operative does not need to provide the documents to the regulators, just to notify them of the accountability statement areas for each Accountable person.

Person Ceasing to be an Accountable Person Instruction

The Co-operative is required to notify the regulators when:

- a person ceases to be an Accountable Person;
- the dismissal or suspension of an Accountable Person because the person has failed to comply with his or her accountability obligations.

The following steps should be followed to notify the regulators of a person ceasing to be an Accountable Person:

- a) Notify the regulators **within 21 days after** the change of the person ceasing to be an Accountable Person by submitting the following documents:
 - Registration Form completed in the relevant section relating to a person ceasing to be an Accountable Person;
- b) Notify the regulators **within 21 days after** the change of any:
 - Updated Accountability Map – i.e. to the extent any consequential changes are required to reflect the person ceasing as an Accountable Person (**refer to Change in Accountability Map Instruction below**);
 - Updated Accountability Statements of other Accountable Persons – i.e. to the extent any consequential changes are required to reflect the person ceasing as an Accountable Person – (**refer to Change in an Accountable Person’s Accountability Statement Instruction below**).
 - Note that if a new Accountable Person has been nominated to replace the person ceasing (who has not previously been registered as an Accountable Person for the Co-operative), registration of the new Accountable Person should occur 21 days before the person commences as an Accountable Person (**refer to New Accountable Person Registration – section 3.7 above**)

Change in Accountability Map Instruction

The Co-operative must notify the regulators of any changes to an Accountability Map within **21 days after** the change.

Changes to the Accountability Map of the Co-operative may arise where:

- an Accountable Person has resigned or has been terminated;
- there is a restructure;
- a new Accountable Person is appointed; and / or
- other amendments to the Accountability Map for example arising as a result of a periodic review or update.

The following steps should be followed when notifying the regulators of changes to an Accountability Map:

- a) Amend and update the Accountability Map for the Co-operative;
- b) Notify the regulators within 21 days **after** the change by advising of the following:
 - Updated Accountability Map; and
 - Registration Form completed in the relevant section to provide a brief description of the update.

Change in an Accountable Person’s Accountability Statement Instruction

The Co-operative must notify the regulators of any changes to an Accountability Statement within **21 days after** the change.

Changes to the Accountability Statement of the co-operative may arise where:

- an Accountable Person has resigned or has been terminated;
- there is a restructure or an acquisition;
- other amendments to the Accountability Statement for example arising as a result of a periodic review or update or the Accountable Person’s responsibilities changing.

The following steps should be followed when notifying the regulators of changes to an Accountability Statement:

- a) Amend and update the Accountability Statement/s for the Co-operative;
- b) Provide amended Accountability Statement to the Accountable Person/s for review and signing;
- c) Notify the regulators **within 21 days after** the change by advising of the following:
 - Updated Accountability Statement/s; and

- Registration Form completed in the relevant section to provide a brief description of the update.

Breach of Accountability Obligations by an ADI Instruction

The Co-operative must notify the regulators of becoming aware of a breach of accountability obligations by the ADI or by an Accountable Person.

The following steps should be followed when notifying the regulators of a dismissal or suspension of an Accountable Person and/or change to Variable Remuneration due to a Breach:

- a) Notify the regulators **within 21 days after** the occurrence of the breach by submitting the following:
 - Notification Form with the relevant section completed.³
- b) Undertake such further actions as required by the regulators such as providing updates to the regulators on remediation actions taken to address the Breach and any other Notifications as required under this FAR Policy.

Breach of Accountability Obligations by an Accountable Person

The Co-operative must notify the regulators of:

- dismissal or suspension of an Accountable Person; and
- a reduction of the variable remuneration of an Accountable Person,

where either of these events have occurred because the person has failed to comply with his or her accountability obligations (**Breach**).

The following steps should be followed when notifying the regulators of a dismissal or suspension of an Accountable Person and/or change to Variable Remuneration due to a Breach:

- a) Notify the regulators **within 21 days after** the occurrence of each event by submitting the following:
 - Notification Form with the relevant section completed.⁴
- b) Undertake such further actions as required by the regulators such as providing updates to the regulators on remediation actions taken to address the Breach and any other Notifications as required under this FAR Policy.

³ Multiple notifications may need to be provided in relation to the same breach of accountability obligations.

⁴ Multiple notifications may need to be provided in relation to the same breach of accountability obligations.

Part 2 Fit and Proper Regime

4 Criteria for Assessment

4.1 Criteria for Assessment of Responsible Officers / Accountable Persons within the Co-operative

Responsible officers / Accountable persons within Co-operative must:

- possess the competence, character, diligence, honesty, integrity, and judgement to perform properly their duties;
- not be disqualified from holding a responsible officer / accountable person position under the *Banking Act, 1959*;
- ideally have no conflict of interest in performing the duties of the responsible officer / accountable person position;
- if the person has a conflict of interest, it would be prudent for the Co-operative to conclude that the conflict will not create a material risk that the person will fail to perform properly the duties of the position; and
- for a senior manager be ordinarily resident in Australia.

A person will only be assessed as fit and proper for a responsible officer / accountable person position within the Co-operative once all these criteria are satisfied. The Co-operative will define questions that indicate the ability to meet the character component of these criteria. These questionnaires along with the competency and training requirements will be incorporated into the human resource and Director election practices of the Co-operative, wherever possible. They will always be integrated into the appointment process and the performance evaluation process for every responsible officer / accountable person.

Notwithstanding these questions, criteria and processes, it is still a matter for the Board of the Co-operative to make the final decision as to whether or not a person is fit and proper; although, this decision may be overridden by APRA.

Section 6 of this Policy details the process that will occur if a person is not found to be fit and proper.

4.2 Criteria Applying to Responsible Officer Auditors

A person serving in a responsible officer position as the Co-operative's auditor must also satisfy the criteria mentioned above in relation to responsible officer positions within the Co-operative. In addition, to be considered fit and proper the person must:

- (a) be a registered auditor under the *Corporations Act 2001*;
- (b) be ordinarily resident in Australia;
- (c) be a member of a recognised professional body; and
- (d) have a minimum of 5 years relevant experience in the audit of ADIs (which would make it "prudent to conclude that the person is familiar with current issues in the audit of ADIs).

If the Co-operative believes that, despite not complying with the above criteria, there are exceptional circumstances that make it appropriate for a person to continue in a responsible officer auditor position, that person may continue in the position and the Co-operative will promptly notify APRA "of which eligibility criteria are not satisfied and of the exceptional circumstances" that make it appropriate for that person to continue in the position. The person may continue to hold the responsible officer auditor position until APRA notifies the Co-operative that it is inappropriate.

The Co-operative will define and maintain competency requirements, questions, criteria, and tools for the assessment of responsible officer auditors, incorporated in the assessment and appointment process.

5 Time for Conducting a Fit and Proper Assessment

Unless stated otherwise in accordance with this Policy, assessments of a person's fitness and propriety for a responsible officer / accountable person position will be made:

- (a) prior to a person being appointed to a responsible officer / accountable person position; and
- (b) annually (in August) after appointment to a responsible officer / accountable person position.

Assessments of a person's fitness and propriety for a responsible officer position will not necessarily be made prior to the appointment of that person to a responsible officer position where:

- (a) the person holds the position because of a resolution of members of the Co-operative; or
- (b) because APRA has determined in writing that the person is a responsible officer / accountable person, as the person plays a significant role in the management or control of the Co-operative, or the person's activities may materially impact on prudential matters.

In each of these cases, an assessment of the fitness and propriety of the person is required "to be completed within 28 days of the person becoming the holder of the responsible officer / accountable person position".

The Co-operative may conduct reasonable limited checks on fitness and propriety of persons being appointed to responsible officer / accountable person positions, if:

- (a) "the regulated institution could not reasonably have anticipated that it would need to appoint someone to the position with sufficient time to conduct a fit and proper assessment; and
- (b) the person holds the position on an interim basis for no more than 90 days or such longer period as APRA agrees in writing".

However, an assessment of the fitness and propriety of the person will be conducted in accordance with the usual procedures under this Policy as soon as practicable. This includes a full assessment of the fitness and propriety of a person holding an interim position if that position will extend beyond 90 days or such longer period agreed by APRA in writing.

6 Process for Assessment of Fitness and Propriety

- (a) Assessments of fitness and propriety will be built into the Co-operative's recruitment and promotion processes for responsible officer positions. In terms of recruitment, the assessment must include:
 - (i) Police checks;
 - (ii) Insolvency Check with Australian Financial Security Authority (AFSA)
 - (iii) Disqualification Register Check with APRA and ASIC
 - (iv) Checks on qualifications;
 - (v) Appropriate references being obtained
 - (vi) Checks through the AML / CTF program.
- (b) The process for determining the fitness and propriety of a person within the Co-operative being promoted to a responsible officer / accountable person position will be the same with the exception of the advertisement of the position.

The authorised person who is responsible for conducting the assessment will vary depending on the responsible officer / accountable person position being filled.

6.1 Persons Responsible for Conducting Fit and Proper Assessments

The Co-operative recognises that several people need to be involved in conducting assessments of the fitness and propriety of persons commencing employment in a responsible officer / accountable person position as well as of persons holding those positions. Consequently, the Co-operative has assigned the following people responsibility for assessing the fitness and propriety of persons applying for or holding the specified responsible officer / accountable person positions.

Responsible Officer Position	Assessor
Candidates for election as Director	<ul style="list-style-type: none"> Corporate Governance Committee
Directors Annual Assessment	<ul style="list-style-type: none"> Corporate Governance Committee
Auditors	<ul style="list-style-type: none"> Audit Committee
Chief Executive Officer / Company Secretary	<ul style="list-style-type: none"> Corporate Governance Committee
Executive Management Team	<ul style="list-style-type: none"> Corporate Governance Committee
Other Management	<ul style="list-style-type: none"> Chief Executive Officer

6.2 Information to be Obtained by the Co-operative

The Co-operative requires candidates to complete a Responsible Officer / Accountable Person attestation that includes a declaration relating to the criteria APRA requires the Co-operative to consider when making an assessment of fitness and propriety.

As well as conducting interviews, the assessor will complete checks to ensure the candidate's skills and experience fulfil the competence requirements of the position.

All referees provided by the candidate will also be checked.

The Co-operative recognises that, to make a prudent assessment of a person's fitness and propriety, some of the information that it collects in relation to candidates will be "sensitive information as defined in the *Privacy Act 1988*" and may only be obtained with the consent of the candidate. The candidate will be requested to complete a Candidate Consent Form, which also allows the Co-operative to provide any information that it gathers to APRA.

All sensitive information obtained in relation to a candidate will be treated in accordance with the Co-operative's Privacy and Credit Reporting Policy (GOV-033) and Information Security Policy (GOV-060).

6.3 Annual Fit and Proper Assessments

Assessments of responsible officers / accountable persons holding responsible officer / accountable person positions will be conducted on an annual basis in August.

The Co-operative has a check list for the annual fit and proper assessments.

Responsible officers / accountable persons are required to complete an annual attestation. This requires a responsible officer / accountable person to declare that the information contained in the statutory declaration is true and correct. It also requires responsible officers / accountable persons to add details of additional qualifications, memberships or training they have obtained during the year as well as asking for any other information that may impact on their assessment as a fit and proper person.

If the Co-operative or the person responsible for assessing the fitness and propriety of a responsible officer / accountable person, "becomes aware of information that may result in the person being assessed as not fit and proper", a new fit and proper assessment will occur promptly in relation to the responsible officer / accountable person. This will include undertaking reasonable inquiries and, if necessary, collecting sensitive personal information and will consider the possible materiality of the matter.

6.4 Documentation of Fit and Proper Assessments

The Co-operative will document each fit and proper assessment conducted in accordance with this Fit and Proper Policy for each responsible officer / accountable person and will retain such documentation for current

responsible officer / accountable person position and “recently past” responsible officers / accountable persons of the Co-operative. The Co-operative will also retain copies of “information considered in making the assessment”. These documents will be stored in the W drive by the Chief Risk Officer.

7 When a Responsible Officer / Accountable Person is not Fit and Proper

If, after the Co-operative has made reasonable enquiries into a person’s background for the purpose of assessing them for a responsible officer / accountable person position, the Co-operative does not consider the person to be fit and proper (or if a reasonable person in the Co-operative’s position would hold that opinion), then the Co-operative will:

- (a) “take all steps it prudently can to ensure that the person is not appointed to, or for an existing responsible officer / accountable person, does not continue to hold, the responsible officer / accountable person position”; or
- (b) if the Co-operative is “unable to refuse to make the appointment or remove the person” from the responsible officer / accountable person position, it will notify APRA (refer to *Informing APRA of Certain Information* in this policy for details of the information to be given to APRA). The Co-operative will “not hinder APRA in exercising or considering the exercise of its powers of removal and disqualification in relation to the person”.

The Co-operative must notify APRA “within 10 business days if it assesses that a responsible officer / accountable person is not fit and proper”.

8 Whistleblowing

As detailed in the Employee handbook PER-001, the Co-operative is committed to fulfilling its obligations under CPS 520 by ensuring a free flow of relevant information to relevant positions in the organisation. Therefore, in accordance with CPS 520, the Co-operative has developed the whistleblowing policy (and associated confidential and secure mechanisms) to protect persons making reports to the Co-operative, APRA or other relevant regulatory authority about any non-compliance or unethical behaviour and included this in the Employee handbook.

The Co-operative encourages reporting of the following beliefs where they are held in good faith.

Reportable belief	Who should make the report	To whom the report should be made	What should be reported
A belief that a responsible officer / accountable person does not meet the Co-operative’s fit and proper criteria	Employees or Directors of the Co-operative	The person responsible for the assessment of the fitness and propriety of the responsible officer / accountable person or APRA or both	The belief and the reasons for it
A belief that the Co-operative has not complied with CPS 520	Employees or Directors of the Co-operative or other persons	APRA	The belief and the reasons for it

To ensure that there can be full disclosure to APRA, the Co-operative will “not constrain, impede, restrict or discourage, whether by confidentiality clauses, policies or other means” a person with a belief that a responsible officer / accountable person or the Co-operative has not complied with CPS520 “from disclosing information or providing documents to APRA”.

Additionally, employees and all responsible officers / accountable persons will be provided with training in this policy at their induction. They will also be reminded of the policy during their performance evaluations that no person who makes a disclosure regarding compliance with CPS 520 will be “subject to, or threatened with, a detriment because of any notification” and that any person who held a responsible officer / accountable person position may disclose information or provide documents to APRA “relating to their reasons for resignation, retirement or removal” or discuss the matter with APRA.

8.1 Investigation of the Belief

When a person (the whistleblower) reports a belief that a responsible officer / accountable person does not meet the Co-operative’s fit and proper criteria to the person responsible for making the assessment (the assessor), that assessor will keep the report “confidential and secure within the law” and will re-assess the responsible officer’s fit and proper status “with the objective of locating evidence that either substantiates or refutes the claims made by the whistleblower”. If anonymity during the investigation cannot be maintained, a person may request relocation or a leave of absence.

Investigation of the report will include locating evidence, which may necessitate a request for more information from the whistleblower. The Co-operative will provide the whistleblowers with feedback on the investigation into the re-evaluation of the person’s fit and proper assessment. The Co-operative will also provide the whistleblower with protection from retaliation. The identity or any information that could identify the whistleblower will not be released to any person who is not involved in the investigation or resolution of the matter.

The Co-operative will take all reasonable steps to ensure that no whistleblower making a disclosure to the Co-operative or to APRA is threatened with, a detriment such as dismissal, demotion, any form of harassment, discrimination or current or future bias, because of their report under this Fit and Proper Policy.

Should a person who has reported a belief that a person is not fit and proper, or a belief that the Co-operative is not complying with CPS 520, believe that they have experienced any such disadvantage, the person is encouraged to report this belief to a Director of the Co-operative, or APRA or both.

8.2 Abuse of Reporting Process

Abuse of the confidential reporting process will not be tolerated. Maliciously reporting unfounded allegations will be treated seriously. All reports made under the confidential reporting process must be made in good faith.

8.3 Monitoring and Training

The Co-operative will monitor and review these whistleblowing provisions annually to assess their effectiveness in encouraging the reporting of reportable beliefs, protection of persons making reports, investigating fairly and effectively, and rectifying mistaken assessments.

This monitoring will be facilitated by reports to the Board that will not compromise confidentiality.

Training and education regarding these provisions will be conducted on a regular basis, including practical advice and the criteria used to assess whether a person is a fit and proper person and encourage whistleblowing to its Directors and to those of its employees, “who are likely to have information relevant to fit and proper assessments”.

9 Informing APRA of Certain Information

CPS 520 and FAR impose on the Co-operative several obligations to notify APRA of certain information, in writing and, at times, in the prescribed manner, to ensure that all information provided to APRA remains current for all responsible officers. The Co-operative will comply with these obligations which can be summarised as follows:

Circumstance giving rise to notifying APRA	Information to be notified to APRA	Time at which information to be notified
Appointment or election of a person to a responsible officer / accountable person position	<p>“The following details, to the extent known to the regulated institution:</p> <ul style="list-style-type: none"> • the person’s name, date of birth (for identification purposes only), the person’s position and main responsibilities; and • a statement whether the person complies with the fit and proper criteria as applicable. 	<p>Within 28 days of the appointment FAR within 21 days by notifying the regulators of an accountability statement and updated accountability map.</p>
A responsible officer / accountable person resigns, retires or is removed.	Notification of that change.	<p>Within 28 days of the change FAR within 21 days as above.</p>
There is a material change in the responsibilities of a responsible officer / accountable person.	Details of the material change to the responsibilities of a responsible officer / accountable person.	<p>Within 28 days of the change FAR within 21 days as above.</p>
The Co-operative “forms the belief that a person is not fit and proper for a responsible officer / accountable person position they hold”	<p>The basis for the belief and:</p> <ul style="list-style-type: none"> (a) if the person remains in the responsible officer / accountable person position, the notification must state the reason for this and the action being taken; or (b) if the person no longer holds the responsible officer / accountable person position for which the 	<p>“As soon as practicable, and in any event, within 10 business days after the date when the relevant belief was formed.” FAR within 21 days as above.</p>

Circumstance giving rise to notifying APRA	Information to be notified to APRA	Time at which information to be notified
	regulated institution considers they were not fit and proper, a statement of that fact.	
The Co-operative “forms the belief that information material to an assessment required by the Fit and Proper Policy is held by any person but that, having taken reasonable steps to obtain the information from that person, it has not been obtained within a reasonable time.”	The following: (a) “what the information relates to; (b) who has it; (c) what steps the Co-operative has taken to obtain it.”	“As soon as practicable, and in any event, within 10 business days after the date when the relevant belief was formed.” FAR within 21 days as above
Annual reporting	The following: (a) “a list of the Co-operative’s responsible officers / accountable persons with, for each, their date of birth (for identification purposes only) and the responsible officer position that they hold at the date of lodgement of the list.	Annual D2A Reporting ARF520 Report as at 31 March. FAR, as and when changes occur and then within 21 days.
A request from APRA or ASIC for information or documentation “to assist APRA or ASIC in assessing the fitness and propriety of a person” for CPS 520.	The information requested, which may include a copy of the Fit and Proper Policy.	As specified at the time by APRA or ASIC

10 Review and Publication of Fit and Proper and FAR Policy

This Fit and Proper and FAR Policy is not a static document and should always reflect the Co-operative's statutory obligations and best practices. Consequently, this policy will be reviewed at least annually and when new guidelines are issued by the regulators or other statutory bodies to ensure that both the policy and the implementation of the policy meet the current requirement.

The Co-operative will make the policy available to any person upon request. A copy of the Fit and Proper and FAR Policy will also be provided to all candidates for election as a Director "as soon as possible after the candidate is nominated" as well as to "any other person before an assessment of their fitness and propriety is conducted".

There will also be an annual training session for all responsible officers / accountable persons on the provisions of this Fit and Proper and FAR Policy and a copy will be given as part of the induction process to all persons employed, promoted, or elected into a responsible officer / accountable person position.

11 Fit and Proper and Risk Management

Having a person who is not fit and proper employed in a responsible officer / accountable person position must be considered a compliance risk. Consequently, this Fit and Proper and FAR Policy will form part of the Co-operative's risk management system as required under *Prudential Standard APS 310 Audit and Related Arrangements for Prudential Reporting*.

12 Definitions

12.1- Responsible Officer / Accountable Person Definitions

Director

A Director is defined in section 9 of the *Corporations Act 2001* as:

- (a) “a person who:
 - (i) is appointed to the position of a director; or
 - (ii) is appointed to the position of an alternate director and is acting in that capacity; regardless of the name that is given to their position; and
- (b) unless the contrary intention appears, a person who is not validly appointed as a director if:
 - (i) they act in the position of a director; or
 - (ii) the directors of the Co-operative are accustomed to act in accordance with the person's instructions or wishes.

Subparagraph (b)(ii) does not apply merely because the directors act on advice given by the person in the proper performance of functions attaching to the person's professional capacity, or the person's business relationship with the directors or the Co-operative body.”

Responsible Officer / Accountable Person

A responsible officer is defined in paragraph 14 of CPS 520 and the FAR as

- (a) a director of the regulated institution;
- (b) a senior manager of the regulated institution;
- (c) an appointed auditor who provides any report in relation to the ADI that is required to be prepared by an auditor under the Banking Act, prudential standards made under the Banking Act or reporting standards under the Financial Sector (Collection of Data) Act 2001 (responsible officer auditor); and
- (d) any other person whom APRA or ASIC determines by notifying the regulated institution in writing being a person whom APRA or ASIC is satisfied plays a significant role in relation to the management or control of the regulated institution or provides services or support for it which are of a prudentially significant nature.”

Responsible Officer / Accountable Person Position

The “responsible officer / accountable Person position means the functions and duties to be undertaken by a responsible officer / accountable person that involve any relevant activities. A person need not be an employee of the regulated institution to be a responsible officer / accountable person. In some circumstances a consultant or contractor may be a responsible officer / accountable person.”

Senior Manager

A Senior Manager is any person who is responsible for senior management activities. These activities “may materially affect the whole or a substantial part of the regulated institution’s business or its financial standing” and may include any of the following:

- “(a) participation in decision making;
- (b) implementing strategies and enforcing policies approved by the Board of directors;
- (c) developing and implementing processes or systems that identify, assess, manage, or monitor risks in relation to business activities and operations; and
- (d) monitoring the appropriateness, adequacy, or effectiveness of risk management systems.”

Normally, this will not extend beyond the CEO, and those reporting to the CEO.

Appendix A

The Co-operative's Schedule of Responsible Officer / Accountable Person Positions

Designated Responsible Officers as at 8 June 2023

Category of Responsible Officers / Accountable Persons	Responsible Officer / Accountable Person Position	Name of Responsible Officer / Accountable Person	Date of Birth
Directors	Chairman	Bohdan Wojewidka	3/4/1956
	Director / Deputy Chairman	Andrew Pavuk	4/12/1956
	Director	John Lipkiewicz	25/09/1955
	Director		
	Director	Nicholas Bugryn	30/04/1984
	Director	Luke Galashchuk	21/02/1982
	Director	Pavlo Smoliy	18/03/1984
	Company Secretary	Andrew James	21/01/1962
	Company Secretary	Paul Coulson	15/12/1972
Senior Managers	Chief Executive Officer	Andrew James	21/01/1962
	Chief Financial Officer	Paul Coulson	15/12/1972
	Lending & Member Services Executive	Ivanna Bernyk	19/1/1974
	Marketing & ICT Executive	Sonja van de Camp	24/10/1970
	Chief Risk Officer	Philip Timewell	15/03/1962
Auditors	Crowe Horwath	Brad Bohun	
	Grant Thornton	Darren Scammel	

The Co-operative's Responsible Officer / Accountable Person Competency Matrix

As required by CPS 520 and FAR and using RG 105 as guidance, the Co-operative has defined and documented "the competencies required for each responsible officer / accountable person position" as follows. This documentation includes "any training or induction processes required" for each responsible officer / accountable person position "on appointment to the position and on an ongoing basis".

Category of Responsible Officers	Responsible Officer / Accountable Person Position	Competencies necessary prior to commencement	Induction process	On-going training
Directors	Director	<p><u>Each Director:</u></p> <ul style="list-style-type: none"> - industry knowledge/ experience - knowledge of the Co-operative & Ukrainian community - ability to probe and challenge key strategic issues and an ability to understand all stakeholders' views and issues - communications skills <p><u>Combined Directors Skills</u></p> <ul style="list-style-type: none"> - financial skills - audit & risk management - corporate governance understanding 	<p>Policies and procedures of the Co-operative.</p> <p>Directors Handbook</p> <p>Introduction to Understanding Financial Reports</p>	AICD, AM I or other professional industry related development programs
	Chairman	<ul style="list-style-type: none"> -effective leader and motivator - Strategic Focus - Mentor for Directors - Good Judgement 		

The Co-operative's Responsible Officer Competency Matrix

Category of Responsible Officers	Responsible Officer / Accountable Person Position	Competencies necessary prior to commencement	Induction process	On-going training
Senior Managers	Company Secretary	Professional degree (either legal or financial) and prior experience in a similar role	Policies and Procedures Directors Handbook Employees Handbook	AICD, AMI or other professional industry related development programs
	Chief Executive Officer	Degree level commerce qualification and 5 years' experience in a senior managerial position	Policies and Procedures Employees Handbook	AMI or other related professional development programs
	Chief Financial Officer	Degree level accounting qualifications, CA/CPA, and 5 years' experience in a senior managerial/finance position		
	Lending & Member Services Executive	5 years' experience in a senior lending position		
	Marketing & ICT Executive	5 years' experience in a senior management position		
	Chief Risk Officer	Degree level commerce or law qualifications and/or 5 years' experience in a senior compliance or risk position and/or meets widely adopted relevant industry standard, or relevant standard set by APRA.		

Appendix B Fit and Proper Documentation

Document B 1: Responsible Officer / Accountable Person Checklist- Directors & Executive Management

IMPORTANT: The Fit & Proper check must be completed within 28 days of the new manager / Director commencing, as ASIC will apply penalties if not advised within this timeframe.

Applicant: _____

- Note that all the necessary forms below can be found in the system at;
w:\Compliance\3.10 Fit & Proper\Current Forms
- Document 2.1: Character Criteria for Fit and Proper Assessment
 - To be completed by person Fit & Proper is being performed on and witnessed by those able to witness statutory declarations.
- Document 5: Candidate Consent Form
 - To be completed by person Fit & Proper is being performed on before you are able to collect any information for the Fit & Proper checks.
- Document 7: Director Independence Declaration.
 - To be completed by person Fit & Proper is being performed on.
- Conflict of Interest Declaration.
 - To be completed by person Fit & Proper is being performed on.
 - Is the assessor confident that these conflicts will not create a material risk that the person will not properly perform their duties.
- Deed of Confidentiality.
 - To be completed by person Fit & Proper is being performed on.
- Verification of the individual's claimed qualifications from the issuing institution(s) – Copies of Degrees etc. To be verified with the institution/organization/association.
 - 1
 - 2
 - 3
 - 4
- Verification of the individual's claimed experience from previous employers or co-workers.
 - 1
 - 2
 - 3
- Candidate's Reference Check – call and performs the reference check. The form can be found in the compliance folder as noted above.
 - 1
 - 2
 - 3
- Police Check/Court Check - Australian Federal Police (AFP)
 - To be completed by person Fit & Proper is being performed on.
 - Send to AFP with required payment cheque to obtain the police report – this may take up to 6 weeks, so it is essential to get this posted ASAP.
 - Applications may be processed online.

- Bankrupt person and company search and insolvency check – Australian Financial Security Authority (AFSA)
 - To be completed by the Compliance & Risk Manager using Veda credit checking facility in lending department. They will send a response back with what their records retrieved.
- Professional Association enquiries – i.e. CPA
 - Check with organization if their membership is still valid
- Check ASIC Register – Banned and Disqualified Persons
 - www.search.asic.gov.au/ban.html check under AFS banned/ disqualified persons. Printout the list and make sure to hit the **more** button to ensure that there aren't two or more pages.
- Check APRA Registers – Disqualification and Enforceable Undertakings Registers
 - www.apra.gov.au/Disqualification-Register-List.cfm printout the list and check that the person is not on this list.
 - www.apra.gov.au/CrossIndustry/Pages/EnforceableUndertakings.aspx printout the list and check that the person is not on this list.
- If there are any adverse findings to any of the above, then further investigation may be required. Whether required or what the nature of this is will have to be determined on a case by case analysis.
- Screen against the Transwatch system as required under the AML / CTF program.
- A Meeting must be called of the Corporate Governance Committee. They must then assess with the information gathered, or any other knowledge they may have, whether that person is Fit & Proper for their position and possess the requisite competence to carry out the position;
 - Director standing for re-election
 - New person standing for election.
 - Annual director assessment
 - Chief Executive Officer/Company Secretary
 - Executives
 - Auditors

Corporate Governance (Nominations) Committee Members Assessing;

Signature:

Name:

Date:

ADDITIONAL CHECKLIST FOR APPROVED PERSONS ONLY

- ASIC will have to be informed. **This must be done within 28 days or late fees will apply.** (CEO / Company Secretary)
- APRA will have to be informed. (Company Secretary)
- Provide new Director, Manager, or Auditor with copy of current Policies and Charters. (CEO / Company Secretary)
- Send outlook invitation for Board and Committee Meetings (Director only) (CEO/Company Secretary)
- Announcement of appointment – internally and externally (Chairman and CEO)
- Building security access (FOB). (Chief Risk Officer)
- Update Phone Listing and Website Director/ Manager Profile (Marketing & ICT Executive)
- Update Business Continuity Plan (BCP) (Chief Risk Officer)
- Update Conflict of Interest Matrix (Company Secretary)

This completes the process and the file can now be stored in the Fit & Proper file for our records.

Company Secretary.

Signature:

Name:

Date:

Document B 2: Character Criteria for Fit and Proper Assessment upon election or prior to appointment to a responsible officer / accountable person position.

2.1: Character Attestation

Responsible Officer / Accountable Person Character Attestation Form

I _____ of _____ state that at no time have I:

- Failed to comply, in any material respect, with the Co-operative Constitution, Corporate Governance Charter and Policies, and Director`s code of conduct.
- Failed to discharge with diligence, honesty, integrity, or judgment my responsibilities as a director or manager of, or professional services provider to, a body corporate, statutory body, partnership trust, or commercial enterprise of any kind.
- Been subject to justifiable criticism, discipline, punishment, adverse findings, directions, or orders, by a court, tribunal, official inquiry, regulatory agency, complaints handling body, dispute resolution body, or professional or industry body concerning my conduct in relation to:
 - (i) the management of an entity; or
 - (ii) commercial or professional activities.
- Been subject to civil or criminal proceedings, or enforcement actions, in relation to:
 - (i) the management of an entity; or
 - (ii) commercial or professional activities;that were determined adversely against me (this includes my consenting to an order or direction, and to my giving an undertaking not to engage in unlawful or improper conduct) and which reflected adversely on my competence, character, diligence, honesty, integrity, or judgement.
- Been expelled or excluded from, or refused admission to, a professional or industry body, or a clearing house or exchange.
- Been involved with the affairs of an entity that was expelled or excluded from, or refused admission to, a professional or industry body, or a clearing house or exchange where I engaged in conduct that caused or contributed to the entity`s expulsion, exclusion, or non-admission.
- Been refused a licence or authorisation relating to a commercial or professional activity or had such a licence or authorisation revoked.
- Been involved with the affairs of an entity that was refused a licence or authorisation relating to a commercial or professional activity or had such a licence or authorisation revoked where I engaged in conduct that caused or contributed to the refusal or revocation of the licence or authority.
- Had my appointment terminated, or been asked to resign, from a position as director or manager or professional service provider to an entity in circumstances which reflected adversely on my competence, character, diligence, honesty, integrity, or judgment in discharging my responsibilities in the position.
- Seriously or persistently failed to manage my debts or financial affairs in accordance with my contractual or other legal obligations where this failure caused loss to others.
- Been or acted as a director or manager of, or professional advisor to, an entity that:
 - (i) was, or later came to be, insolvent;
 - (ii) was, or later came to be, under insolvency administration;
 - (iii) was, or later came to be, under statutory or judicial management; or
 - (iv) failed to repay or otherwise failed to meet its financial obligations to, creditors or beneficiaries, and engaged in unreasonable or unlawful conduct that caused or contributed to the insolvency, placement under insolvency administration or statutory or judicial management, or failure to repay or otherwise meet obligations to creditors or beneficiaries.

Document B 2: Character Criteria for Fit and Proper Assessment upon election or prior to appointment to a responsible officer / accountable person position.

2.1: Character Attestation

- Contravened any regulatory requirement or professional standard relating to:
 - (i) the management of an entity; or
 - (ii) commercial or professional activities.
- Been unreasonably or improperly obstructive of, or misleading or untruthful in dealing with, a court, tribunal, official inquiry, regulator, complaints handling body, dispute resolution body, or professional or industry body.
- Breached a fiduciary obligation or other legal or professional obligation involving trust or conflict of interest or perpetuated or participated in negligent, deceitful, or otherwise discreditable business or professional practices.
- Failed to comply with a fit and proper policy of an APRA-regulated institution.

I further attest that I have never been disqualified from holding a responsible officer position under the *Banking Act 1959 (Cth)*.

Signed:

Signature

Date

Witness

Date

Print Witness Name

Document B 2: Character Criteria for Fit and Proper Assessment

2.2: Questions Asked of Nominated Referees

Introduce yourself.

[Name of responsible officer / accountable person] has applied for the position of [insert position] at Co-operative. S/he has nominated you as a referee.

The Australian Prudential Regulation Authority has issued *Prudential Standard CPS 520 Fit and Proper Person and the FAR Act*, which requires certain information to be collected about and attested to by candidates for what it terms Responsible Officers / Accountable Persons Positions. [Insert position] is such a position and we have been authorised by [name of responsible officer / accountable person] to ask you about issues contained in the Standard. I can fax you a copy of their consent form if you wish.

I have a series of questions to ask as to the eligibility of [name of responsible officer / accountable person] for the position.

Competence

To the best of your knowledge does [name of responsible officer] possess the following:

- [Insert claimed academic credentials]
- [Insert claimed experience and probe on performance]
- [Insert claimed professional memberships]

Do you think [name of responsible officer / accountable person] is competent to perform the role of [insert position]?

Yes

No Details:

Character

To the best of your knowledge has [name of applicant] ever:

- Failed to discharge his/her responsibilities as a director or manager of, or professional services provider to, a body corporate, statutory body, partnership trust, or commercial enterprise of any kind with diligence, honesty, integrity, or judgement?

No

Yes Details:

- Been subject to justifiable criticism, discipline, punishment, adverse findings, directions, or orders, by a court, tribunal, official inquiry, regulatory agency, complaints handling body, dispute resolution body, or professional or industry body concerning his/her conduct in relation to:

(i) the management of an entity; or

(ii) commercial or professional activities?

No

Yes Details:

Document B 2: Character Criteria for Fit and Proper Assessment

2.2: Questions Asked of Nominated Referees

- Been subject to civil or criminal proceedings, or enforcement actions, in relation to:
 - (i) the management of an entity; or
 - (ii) commercial or professional activities;

that were determined adversely against him/her (this includes him/her consenting to an order or direction, or to him/her giving an undertaking not to engage in unlawful or improper conduct) and which reflected adversely on his/her competence, character, diligence, honesty, integrity, or judgement?

No

Yes Details:

- Been expelled or excluded from, or refused admission to, a professional or industry body, or a clearing house or exchange?

No

Yes Details:

- Been involved with the affairs of an entity that was expelled or excluded from, or refused admission to, a professional or industry body, or a clearing house or exchange where he/she engaged in conduct that caused or contributed to the entity's expulsion, exclusion, or non-admission?

No

Yes Details:

- Been refused a licence or authorisation relating to a commercial or professional activity, or had such a licence or authorisation revoked?

No

Yes Details:

- Been involved with the affairs of an entity that was refused a licence or authorisation relating to a commercial or professional activity, or had such a licence or authorisation revoked where he/she engaged in conduct that caused or contributed to the refusal or revocation of the licence or authority?

No

Yes Details:

Document B 2: Character Criteria for Fit and Proper Assessment

2.2: Questions Asked of Nominated Referees

- Had his/her appointment terminated, or been asked to resign, from a position as director or manager or professional service provider to an entity in circumstances which reflected adversely on his/her competence, character, diligence, honesty, integrity, or judgement in discharging his/her responsibilities in the position?

No

Yes Details:

- Seriously or persistently failed to manage his/her debts or financial affairs in accordance with his/her contractual or other legal obligations where this failure caused loss to others?

No

Yes Details:

- Been or acted as a director or manager of, or professional advisor to, an entity that:

(i) was, or later came to be, insolvent;

(ii) was, or later came to be, under insolvency administration;

(iii) was, or later came to be, under statutory or judicial management; or

(iv) failed to repay or otherwise failed to meet its financial obligations to, creditors or beneficiaries,

and engaged in unreasonable or unlawful conduct that caused or contributed to the insolvency, placement under insolvency administration or statutory or judicial management, or failure to repay or otherwise meet obligations to, creditors or beneficiaries?

No

Yes Details:

- Contravened any regulatory requirement or professional standard relating to:

(i) the management of an entity; or

(ii) commercial or professional activities?

No

Yes Details:

- Been unreasonably or improperly obstructive of, or misleading or untruthful in dealing with, a court, tribunal, official inquiry, regulator, complaints handling body, dispute resolution body, or professional or industry body?

No

Yes Details:

Document B 2: Character Criteria for Fit and Proper Assessment

2.2: Questions Asked of Nominated Referees

- Breached a fiduciary obligation or other legal or professional obligation involving trust or conflict of interest or perpetuated or participated in negligent, deceitful, or otherwise discreditable business or professional practices?

No

Yes Details:

- Failed to comply with a fit and proper policy of an APRA-regulated institution?

No

Yes Details:

- Been disqualified from holding a responsible officer position under the *Banking Act 1959 (Cth)*?

No

Yes Details:

As far as you are aware, does [name of responsible officer] hold any conflict(s) of interest (or perceived conflict(s) of interest) with the position of [insert position]?

No

Yes Details:

Is there any other fact of which you think we need to be aware that goes to [name of responsible officer]’s competence, character, diligence, honesty, integrity, and judgement to perform their duties?

No

Yes Details:

Thank interviewee for time.

Signed by the Interviewer:

Signature

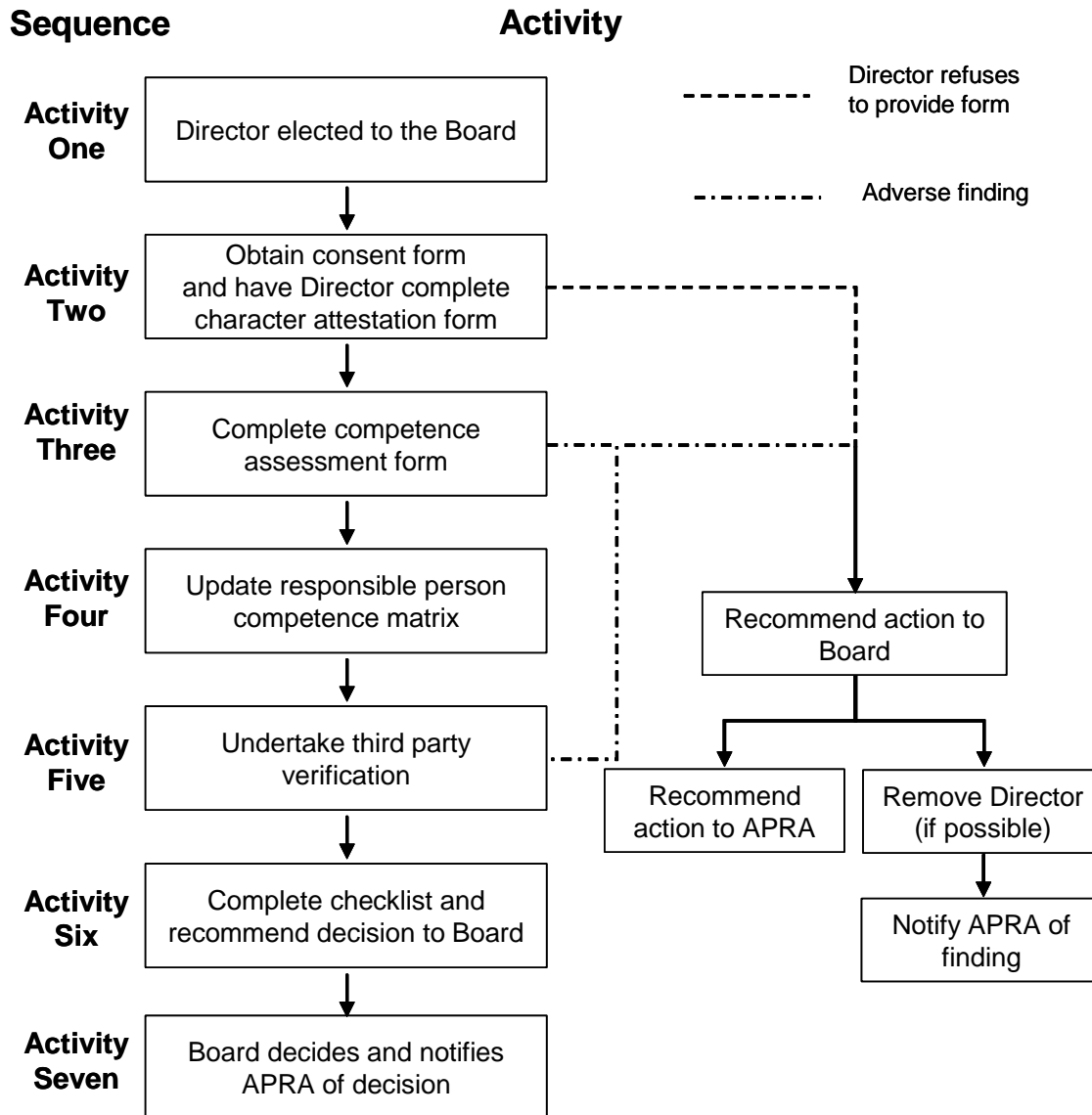
Name

Date

Document B 3: Responsible Officer / Accountable Person Appointment Process

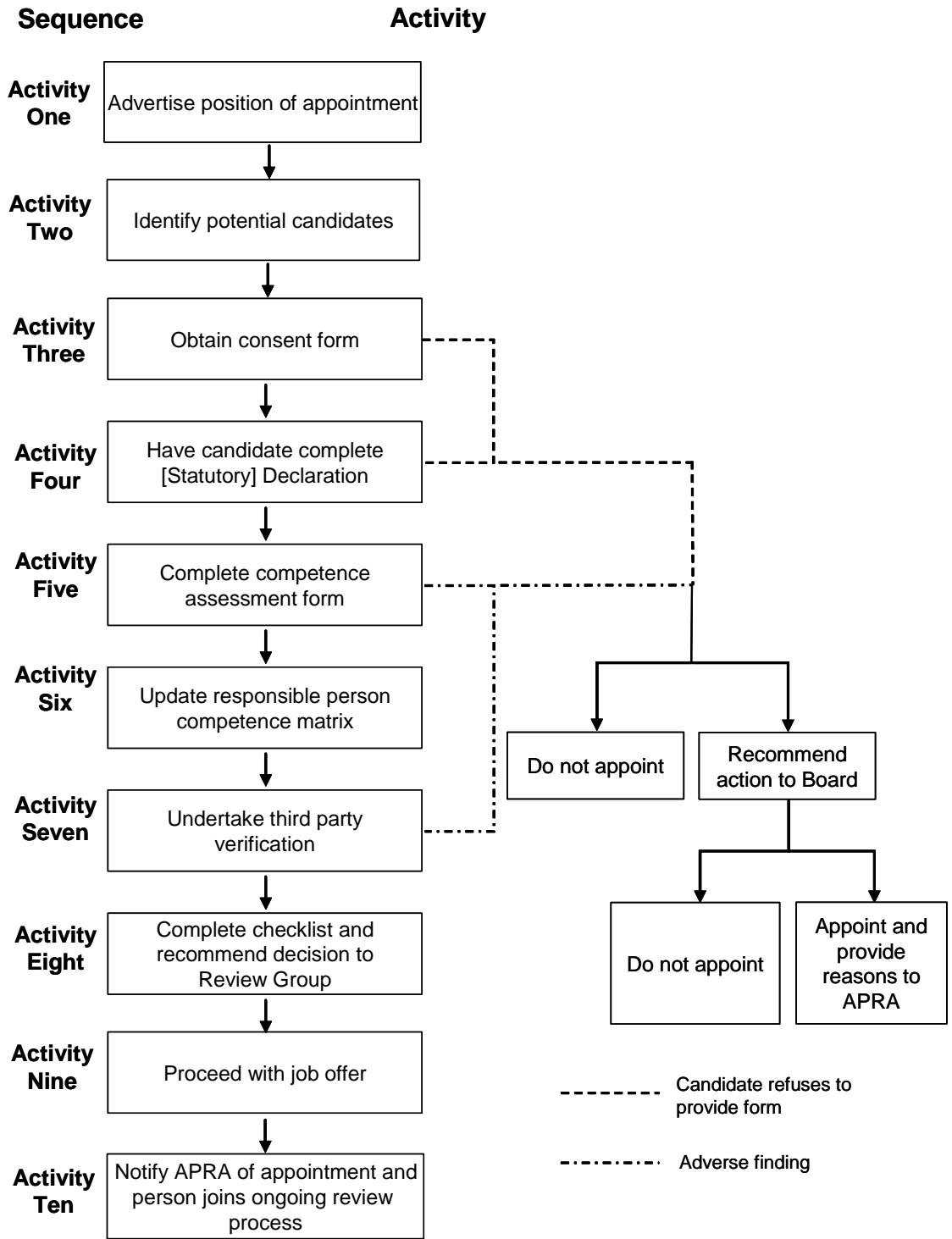
3.1: Director Appointment Process

Activities involved in reviewing directors



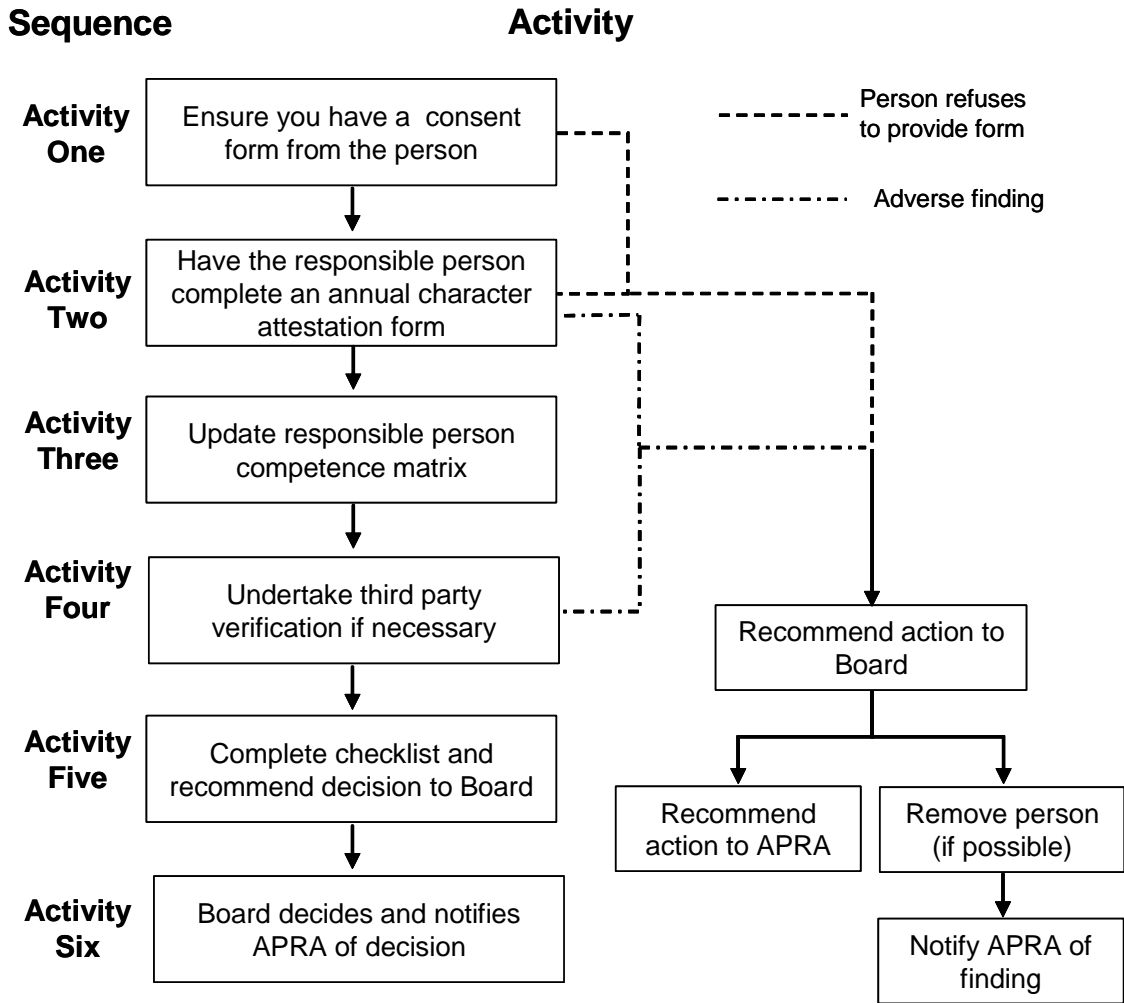
3.2: Management Responsible Officer / Accountable Person Appointment Process

Process for ensuring responsible person appointments are fit and proper



3.3: Annual Review Process

Activities involved in reviewing responsible persons



Document B 4: Competence Assessment Form

Competence Assessment Form

Name of person being assessed: _____

Ensuring key decision makers at Co-operative are fit and proper is a key responsibility of the Board. To guide this process, the Board has established the following list of questions and criteria that are to be considered when assessing an individual’s competence. The Assessor, however, may consider other relevant factors not listed here.

Skills

Does the individual possess appropriate formal qualifications for the position (please provide details)?

Qualification	Year awarded	Awarding Institution

Experience

Does the individual possess appropriate experience for the position (please provide details)?

Position	Tenure	How relevant	Other

Does the person fulfil the competence requirements set out in Co-operative’s position description? If not, please provide evidence that the person is competent to fill the position:

Please list any other relevant factors that you believe highlight the person possesses the appropriate skills and experience for the position:

Signed by the Assessor:

Signature

Name

Date

Document B 5: Candidate Consent Form

Consent Form Regarding Recruitment and Review of Incumbents for Responsible Officer / Accountable Person Positions

The Australian Prudential Regulation Authority (APRA) has issued *Prudential Standard CPS 520 Fit and Proper and the FAR Act* that requires certain information to be collected about and attested to by candidates for what it terms Responsible Officer / Accountable Person Positions. In relation to this information and other information collected by Co-operative about you during its recruitment / election / appointment or review process, Co-operative is required to comply with the *Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012* (the Act), which places minimum standards on private sector organisations for the way they collect, use, disclose and store personal information about individuals. Procedures have been implemented within Co-operative to safeguard and protect your personal information at all stages within the process.

To enable us to manage our process effectively and obtain and maintain your details within the guidelines of the Act, we seek your consent to:

1. Collect, review, and store your personal information for recruitment and/or assessment of your fitness and propriety to hold a Responsible Officer / Accountable Person Position;
2. Complete reference checks based on your nominated referees, if required;
3. Obtain information from professional bodies with which you claim to be affiliated;
4. Obtain information from educational institutions or other training organisations from which you claim to hold qualifications;
5. Hold your résumé for future reference within Co-operative should any other suitable positions arise;
6. Notify APRA of any personal information that it requests or requires in relation to you in accordance with its powers and functions; and
7. Provide a person with a copy of this Consent Form Regarding Recruitment for Responsible Officer / Accountable Person Positions to assist with any of the above purposes.

I have read and agree to the information above:

Full name:

Signed:

Date:

Please refer to our website, www.dnister.com.au, for further details regarding Co-operative's Privacy & Credit Reporting Policy. If you have any queries regarding the above, you can contact the Chief Executive Officer. Should you not wish for us to retain your details if you are unsuccessful in your application, please notify the Chief Executive Officer and we will delete your information.

Document B 6: Annual Attestation Form Criteria

I _____ of _____ state that at no time over the past 13 months have I:

- Failed to comply, in any material respect, with the Co-operative's Constitution, Corporate Governance Charter and Policies, and where applicable, the Director's code of conduct.
- Failed to discharge with diligence, honesty, integrity, or judgment my responsibilities as a director or manager of, or professional services provider to, a body corporate, statutory body, partnership trust, or commercial enterprise of any kind.
- Been subject to justifiable criticism, discipline, punishment, adverse findings, directions, or orders, by a court, tribunal, official inquiry, regulatory agency, complaints handling body, dispute resolution body, or professional or industry body concerning my conduct in relation to:
 - (i) the management of an entity; or
 - (ii) commercial or professional activities.
- Been subject to civil or criminal proceedings, or enforcement actions, in relation to:
 - (i) the management of an entity; or
 - (ii) commercial or professional activities;that were determined adversely against me (this includes my consenting to an order or direction, and to my giving an undertaking not to engage in unlawful or improper conduct) and which reflected adversely on my competence, character, diligence, honesty, integrity, or judgement.
- Been expelled or excluded from, or refused admission to, a professional or industry body, or a clearing house or exchange.
- Been involved with the affairs of an entity that was expelled or excluded from, or refused admission to, a professional or industry body, or a clearing house or exchange where I engaged in conduct that caused or contributed to the entity's expulsion, exclusion, or non-admission.
- Been refused a licence or authorisation relating to a commercial or professional activity or had such a licence or authorisation revoked.
- Been involved with the affairs of an entity that was refused a licence or authorisation relating to a commercial or professional activity or had such a licence or authorisation revoked where I engaged in conduct that caused or contributed to the refusal or revocation of the licence or authority.
- Had my appointment terminated, or been asked to resign, from a position as director or manager or professional service provider to an entity in circumstances which reflected adversely on my competence, character, diligence, honesty, integrity, or judgment in discharging my responsibilities in the position.
- Seriously or persistently failed to manage my debts or financial affairs in accordance with my contractual or other legal obligations where this failure caused loss to others.
- Been or acted as a director or manager of, or professional advisor to, an entity that:
 - (i) was, or later came to be, insolvent;
 - (ii) was, or later came to be, under insolvency administration;
 - (iii) was, or later came to be, under statutory or judicial management; or
 - (iv) failed to repay or otherwise failed to meet its financial obligations to, creditors or beneficiaries, and engaged in unreasonable or unlawful conduct that caused or contributed to the insolvency, placement under insolvency administration or statutory or judicial management, or failure to repay or otherwise meet obligations to creditors or beneficiaries.
- Contravened any regulatory requirement or professional standard relating to:
 - (i) the management of an entity; or

Document B 6: Annual Attestation Form Criteria

(ii) commercial or professional activities.

- Been unreasonably or improperly obstructive of, or misleading or untruthful in dealing with, a court, tribunal, official inquiry, regulator, complaints handling body, dispute resolution body, or professional or industry body.
- Breached a fiduciary obligation or other legal or professional obligation involving trust or conflict of interest or perpetuated or participated in negligent, deceitful, or otherwise discreditable business or professional practices.
- Failed to comply with a fit and proper policy of an APRA-regulated institution.
- Been disqualified from holding a responsible officer position under the *Banking Act 1959 (Cth)*.

I have no change in any conflict(s) of interest (or perceived conflict(s) of interest) with my position except those stated below.

Details of any exception:

I also state that during the last 13 months, I gained the following additional qualifications, memberships and/or training:

The only other information that may impact on the assessment of my fitness and propriety is as follows:

Signed:

Signature

Date

Witness

Date

Print Witness Name

Document B 7: Directors Independence Declaration

I _____ of _____ state

that I am an independent director, both in appearance and fact, and that there is nothing to my knowledge in relation to myself or any company of which I am a member or director that could compromise that independence.

Signed:

Signature

Date

Witness

Date

Print Witness Name

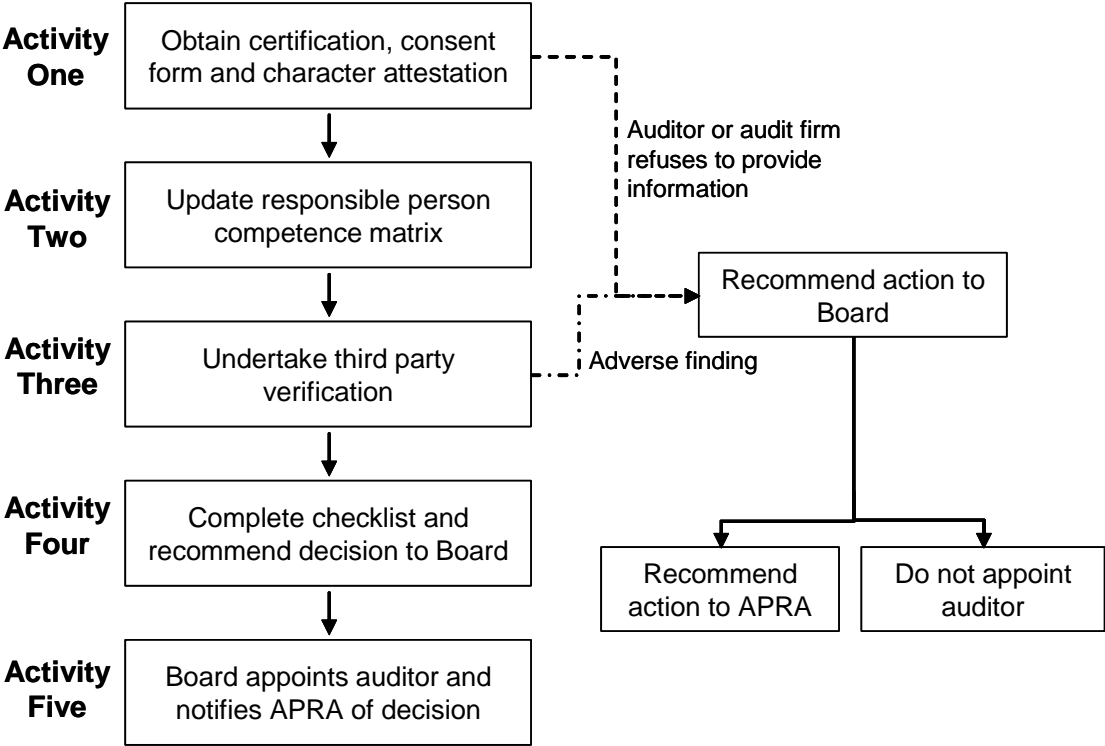
B8 Audit & Risk Management

Document B 8: Responsible Officer Auditor Assessment Criteria and Process

8.1: Auditor Appointment Process

Sequence

Activity



8.2: Auditor Competence Certification Criteria

Auditor Competence Certification Form

Auditor: _____

(firm)

Responsible Officer: _____

Skills and Experience:

Please provide details of any appropriate formal qualifications held by the responsible officer.

Qualification	Year awarded	Awarding Institution

Provide details of appropriate experience of the responsible officer. This list should show a minimum of 5 years relevant experience.

Year	Position/Project	How relevant	Other

Please provide details of all relevant professional associations to which the responsible officer belongs:

Professional Association	Year Joined	Current Grade or Status	Other

Is the responsible officer registered as an auditor under the *Corporations Act 2001*?

Yes/No

Is the responsible officer ordinarily resident in Australia?

Yes/No

Has the responsible officer ever been disqualified from holding the position of auditor or any other responsible officer position?

Yes/No

Does the person hold a conflict of interest that would lead a prudent person to conclude that there is a material risk that the person will not properly perform the position?

Yes/No

If Yes, please provide details:

Has the Responsible Officer completed the appropriate Attestation Form?

Yes/No

Signed by Assessor:

Signature

Name

Date

Document B 8: Responsible Officer Auditor Assessment Criteria and Process

8.3: Auditor Reference Check Criteria

Introduce yourself.

We are considering engaging [Name of responsible officer] as Auditor of Co-operative. S/he has nominated you as a referee. APRA has issued *Prudential Standard CPS 520 Fit and Proper*, which requires certain information to be collected about and attested to by candidates for what it terms Responsible Officer Positions. The Auditor of Co-operative is such a position and we have been authorised by [name of responsible officer] to ask you about issues contained in the standard. I can fax you a copy of their consent form if you wish.

I have a series of questions as to the eligibility of [name of responsible officer] for the position.

1. To the best of your knowledge does [name of responsible officer] possess:
 - a. The requisite skill and experience to audit an ADI in general and Co-operative in particular?
Yes/No
Details:

 - b. The requisite experience to audit an ADI in general and Co-operative in particular?
Yes/No
Details:

2. Is this experience sufficiently recent to ensure that the person is familiar with current issues in the audit of ADIs?
Yes/No
Details:

3. Is the person ordinarily resident in Australia?
Yes/No
Details:

4. Do you have any reason to question [name of responsible officer]'s
 - a. Competence? Yes/No
 - b. Character? Yes/No
 - c. Diligence? Yes/No
 - d. Honesty? Yes/No
 - e. Integrity? Yes/No
 - f. Judgement? Yes/NoDetails:

5. Do you know of any conflict of interest that would lead a prudent person to conclude that there is a material risk that [name of responsible officer] will not properly perform the position?
Yes/No
Details:

6. Is there any other fact of which you think we need to be aware that goes to [name of responsible officer]'s competence, character, diligence, honesty, integrity and judgement to perform their duties?
Details:

Thank interviewee for time.
Signed by the Interviewer:

Signature

Name

Date

Schedule 1 – Review History

The table below provides details on the amendments made to this policy:

Date & Endorsed by	Review changes/comments
18 June 2024 – Corporate Governance Committee 25 June 2024 - Board	Changes to reflect the transition from BEAR to FAR
20 June 2023 – Corporate Governance Committee 27 June 2023 - Board	Refer to summary of changes document dated 8 June 2023.
7 June 2022 Corporate Governance Committee 21 June 2022 - Board	Refer to summary of changes document dated 1 June 2022
8 June 2021 - Corporate Governance Committee 29 June 2021 - Board	Refer to summary of changes document dated 8 June 2021.
23 June 2020 – Corporate Governance Committee 30 June 2020 - Board	Refer to summary of changes document dated 16 June 2020.
11 June 2019 Corporate Governance Committee 25 June 2019 - Board	Refer to the summary of changes document dated 11 June 2019
4 Dec 2018 Corporate Governance Committee 18 Dec 2018 Board	As detailed in the summary of changes document dated 4 December 2018
12 Sep 2017 – Corporate Governance Committee 26 Sep 2017 - Board	No change.
08 Dec 2016 – Corporate Governance Committee 22 Dec 2016 - Board	Change of title “Corporate Services Manager” to “Chief Financial Officer”. Capitalised “Director” where not a quote.
18 Jun 2015 – Corporate Governance Committee 30 Jun 2015 - Board	Change “Audit & Risk Management” to “Audit” 3.1 dot point 3 insert the word “ideally” at the start
10 Jun 2014 – Corporate Governance Committee 24 Jun 2014 - Board	“Dnister” replaced with “the Co-operative” “ITSA” replaced with “Australian Financial Security Authority (AFSA)” as it was renamed “Privacy Policy” extended to “Privacy and Credit Reporting Policy”
13 Aug 2013 – Corporate Governance Committee 27 Aug 2013 - Board	APS520 is now CPS520 Updated January 2013. As a result, considerable changes have been made to the policy that reflect the updated standard.
	Attachment 1 removal of subsidiary section at end because we do not have a subsidiary and it is not relevant.
	The Policy has been considerably reworded in order to clarify the policy and align it with CPS520.
Jul 2012 – Corporate Governance Committee 24 Jul 2012 - Board	Minor grammatically changes only.
1 March 2011 – Corporate Governance Committee 16 March 2011 - Board	No changes.
July 2009 – Corporate Governance Committee	Amendments to chapter 6 and Reporting Schedule in chapter 8. Other minor changes and formatting.