

POL 3005.39

Code of Ethics Policy

Version:	2.0
Effective Date:	27 March 2024
Administered by:	Chief Executive Officer
Reviewed by:	Executive Management Committee, Board Remuneration and Governance Advisory Committee
Approved by:	Board

References

POL 3005.26 Conflicts of Interest Policy
POL 1425 Counselling and Disciplinary Policy for Improved Performance
INF 0539 Disclosure of Gifts Register
POL 3005.25 Privacy Policy
POL 3005.16 Whistleblowing Policy
POL 3005.36 Internet, Email and Social Media Policy

Definitions and Interpretations

Nil

Overview

Ethical behaviour and conduct is the cornerstone of our organisation and this tone is set by the Directors of PCU.

Police Credit Union's Strategic Planning framework provides an important foundation which not only guides future direction, performance expectations and decision-making; it also underpins corporate behavioural and ethical expectations of the Board and all other Employees.

Ethics are those values and principles that we use in making day-to-day decisions. They help us decide if our actions will be right or wrong. Ethical standards help ensure consistent approaches and high standards. They tell us what is expected of us, they help us think through difficult situations and reach appropriate conclusions.

Ethical behaviour and conduct must always be in alignment with PCU core values of superior service, honesty, integrity and financial prudence. Adhering to this principle, and simultaneously delivering consistent high standards of credibility, reliability and intimacy in customer engagement, builds sustainable trust and confidence in the PCU brand and reputation by Members and the community.

This code applies to PCU, its Directors and all PCU Employees and Contractors. For the remainder of this code, PCU Directors, Employees and Contractors are referred to collectively as 'Employees' as endorsed by the PCU Board.

As the Board, we reinforce to you the importance of complying with this Code of Ethics policy at all times and in doing so, uphold the strength of PCU's highly respected reputation.

Corporate values and strategy

Planning for our future is critically important to our Credit Union as it creates direction and focus. Working together towards the achievement of common goals and objectives will ensure that the PCU team will realise greater success in the implementation of its Strategic Plan. And more so, if we undertake our respective responsibilities and accountabilities in line with our core values, and with positive authenticity, we will continue to differentiate our unique and respected brand. The PCU leadership team is resolute in its commitment in being role models in espousing, promoting and practicing positive, ethical leadership, diversity and inclusion and in the implementation of our strategy, within a values-based framework.

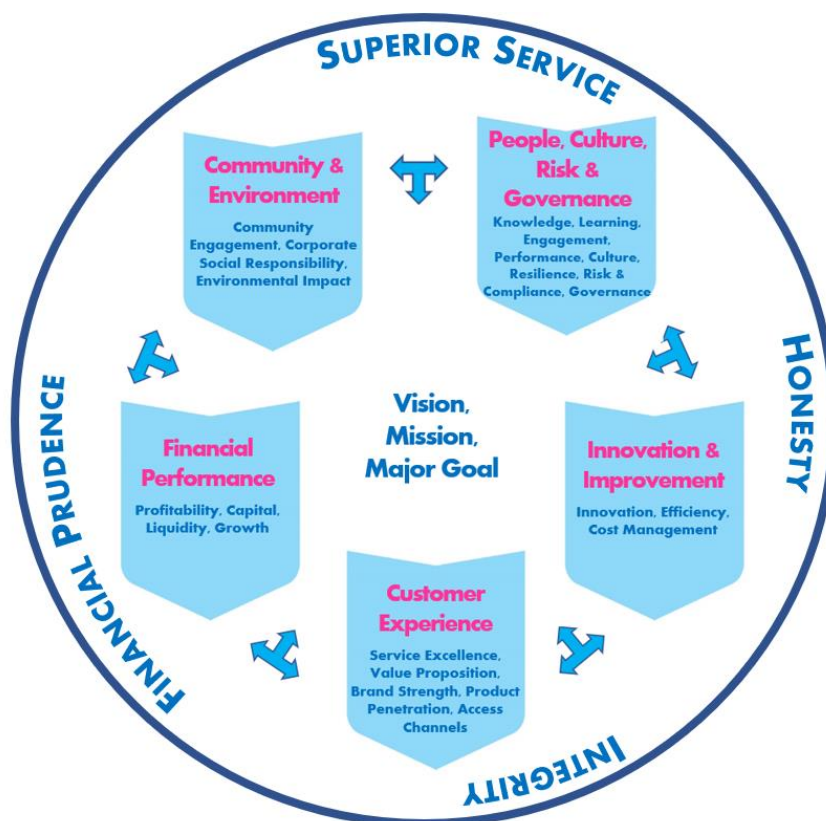
Our Core Values are superior service, honesty, integrity and financial prudence.

Our purpose is to improve our Members' lives by providing outstanding value and service that enables them to achieve their financial aspirations.

Our goal is to deliver a customer experience that is second to none.

Our Vision is to be the credit union that best understands and fulfils the financial aspirations of Members and our people.

Our Mission is to be a market leader in providing innovative and competitive financial products and services to Members. We will achieve this through success in the following areas:



The importance of ethics to Police Credit Union

Working in the financial services industry comes with special obligations because we make important decisions that can impact on our Members' lives and the broader community. The public has a right to expect that Police Credit Union operates with honesty, integrity, fairness, transparency and efficiency. We have an obligation to ensure our decisions and behaviours are consistent with policies, regulatory standards and community expectations. Our commitment to maintaining a positive and ethical culture is directly aligned with our core values of superior service, honesty, integrity, and financial prudence.

Policy

All employees and responsible officers are expected to comply with this policy at all times.

Code of Ethics, Behaviours & Conduct

1. **At all times act with honesty, integrity and impartiality and do not knowingly mislead anyone, including Colleagues, Clients, Members and Regulators.**
2. **Comply with the letter and spirit of all Commonwealth, State and Territory laws, and relevant industry Codes.**
3. **Report all corrupt, illegal and unethical conduct to an Executive Manager, CEO or, where necessary to the Protected Disclosure Officer in accordance with POL 3005.16 Whistleblower Policy.**
4. **Protect the confidentiality of information made available to you, subject to any legal obligations such as disclosure.**
5. **Be alert to conflicts of interest and take appropriate steps to declare and deal with them.**
6. **Provide a high standard of service to all you deal with in performing your duties and obligations.**
7. **Maintain a level of fitness and propriety and develop the necessary level of professional skills and current knowledge to excel in your duties.**
8. **Do not harass or abuse a member of the public or employees either inside or outside of the workplace.**
9. **Do not take, or seek to take, improper advantage of your position in order to obtain a benefit for yourself or another person.**
10. **Seek innovative solutions to problems or challenges and work to achieve continuous improvement to help PCU meet or exceed all relevant legal, industry, safety, environment and other community expectations.**

General Obligations of PCU

All Employees of PCU agree, as a condition of employment, to be bound by this Code of Ethics.

In doing so, we seek to give confidence to those with whom we work, meet, or interact. Our Code of Ethics includes high standards of expected behaviour and conduct and should be interpreted as inclusive of PCU core values and policies, and those enshrined in law, regulation, code, standard, convention or community expectation.

Expectations of PCU Group Employees

The way you perform your duties and conduct yourself is critically important to the integrity of the PCU Group of Companies.

An Employee's behaviour and conduct not only affects our Members, Customers, Clients and other PCU Employees, it ultimately impacts upon the public image of the organisation.

As a PCU Employee, it is your responsibility to carry out your responsibilities efficiently and to the best of your ability, and in accordance with this policy framework. You are expected to approach your work impartially, irrespective of your own views and/or political beliefs. You are expected to use the employer's resources properly and in the best interests of Police Credit Union. Disciplinary action for unauthorised use of PCU's property may be taken.

Leadership

Directors, Executive Managers, Managers, Supervisors and Team Leaders have special responsibilities.

All leaders at Police Credit Union are expected and obligated, at all times, to display high standards of ethical behaviour and professionalism in accordance with core values, regulations, and the law. At all times, leaders must exercise their responsibilities and accountabilities and conduct themselves with honesty, integrity, transparency, due skill, care, and diligence.

By adopting high standards of ethical behaviour and conduct, leaders are setting the tone for all Employees to follow. Leaders must be role models and ambassadors for this policy, ensuring that employees conduct themselves in strict accordance and are guided to interpret and resolve ethical dilemmas correctly.

Conflict of Interest

A conflict of interest arises when your private interests are or are perceived to be in conflict with your official duties.

A conflict of interest can:

- be actual or potential (i.e., an onlooker might assume there is a conflict),
- be financial or personal,
- sometimes extend to the interests of immediate family or close acquaintances.

An example may be where you have a family member or close friend who runs a business which you recommend to a Member. The fact that you have a personal interest in the deal makes this a conflict.

Also, this may be seen by the Member as a recommendation from PCU, which can potentially reflect badly on the Credit Union if something went wrong.

As a PCU Employee, you must disclose any conflict of interest to your Manager and take reasonable action to avoid the conflict.

Disclosing a possible conflict means that you can deal with the issue at an early stage and as such counteract potential criticism or disciplinary action. All employees are required to comply with PCU's policies on this basis.

Directors, Executives and Managers are required to make written disclosures of actual or potential conflicts of interest on appointment, and to update the disclosures every year.

All disclosed actual and potential conflicts are to be recorded on the Employee's personnel file and managed in accordance with POL 3005.26 Conflicts of Interest Policy.

Abiding by the Law

PCU operates in an industry that is subject to many laws and regulations.

Breaches of the law can have serious consequences for PCU, its Members and any Employee involved in the breach (including criminal, civil and administrative penalties). It is therefore imperative that we abide by the laws and regulations that apply to us, at all times and without exception.

To assist our Employees with abiding by the law, PCU will:

- Provide all Employees with appropriate induction – when they join PCU or when they change the roles they undertake for PCU, and at regular intervals while they are employed.
- Make readily available to all Employees appropriate policies and procedures on legislative compliance and other subjects as appropriate.
- Put in place procedures to identify and communicate material changes in law which have the potential to affect the way an Employee is required to perform duties of their employment.

PCU's Employees are expected to maintain, at all times, a high standard of fitness and propriety in order to successfully perform their duties including but not limited to the following:

- Understand what laws apply to the jobs we do. This includes attending training provided by PCU on matters such as FSRA, NCCPA, AML/CTF, Trade Practices, Privacy, Work, Health & Safety & Environment and Fair treatment.
- Understand and act only within your respective delegated authority.
- Comply at all times with all PCU's policies and procedures.
- Must not have declared bankruptcy or entered into a Part 9 Debt Arrangement.
- Satisfactory Dept of Foreign Affairs and Trade (DFAT) database clearance.
- Satisfactory Identity Check to be completed as part of the standard membership application opening process, upon appointment of the employee to their role.
- Disclose known breaches of the law to your manager.
- Disclose any personal, criminal, civil or administrative convictions or charges to the Executive Manager within your relevant business area or the Head of People & Culture at PCU so that details of the matter can be discussed, and then reasonably assessed in the context of your role at work. Where Employees fail to report a personal, criminal, civil or administrative conviction or charge, they may be suspended with pay pending investigation and subjected to POL 1425 Counselling and Disciplinary Policy.

Accepting of Gifts

It's all about transparency.

Accepting a gift* from a person who could benefit from influencing you, places you in a difficult position.

Even the appearance of influence may damage your reputation. Because of this there are strict rules about accepting gifts or benefits through your official duties. The basic rule is not to accept gifts or benefits without the approval of your Executive Manager, unless the gift is of minor financial value and there is no reasonable possibility that it could cause a real or apparent conflict of interest.

Gifts of material value, that is, where their acceptance would likely cause an actual or perceived conflict of interest or their value is greater than \$500, must be approved by the CEO or, by the Chairman where it relates to the CEO or a Director, prior to being accepted.

Examples of minor 'thank you' gifts would be those to the value of up to \$100, including a bottle(s) of wine, box of chocolates, movie ticket, etc. In other circumstances, if it is not possible to politely decline a gift, you should accept a gift on behalf of PCU, and declare it to your Executive Manager.

All gifts received, and which exceed the \$100 threshold, must be recorded in a register in accordance with POL 3005.26 Conflicts of Interest and as set out in INF 539 Disclosure of Gifts Register.

[* A gift is defined as an item or service of value, offered without obligation by another person or entity as an expression of appreciation or goodwill, including an item or service of value received as a prize from a random draw or lottery at a work-related function or convention. In the event that you are not sure, you should err on the side of caution and disclose the item on the gift register.]

Confidentiality

You need to be extremely careful about using information obtained through work.

You can judge the right course of action by asking yourself - *can the general public have access to the same information?*

If the answer is no, then you should make sure you are familiar with the confidentiality requirements of your work area and the PCU POL 3005.25 Privacy Policy. For example, information readily available on the PCU website including Annual Reports, Interest Rate Sheets and brochures can be accessed by the general public, however, sales results, Employee issues or an individual Member's situation are confidential matters.

The publication of any confidential information or derogatory references relating to Police Credit Union Group or its Employees or Directors via social networking sites, 'blogs' or public forums, including but not limited to 'Facebook' and 'Twitter' as examples, as well as emails and faxes etc., is also strictly prohibited. Refer to POL 3005.36 Internet, Email and Social Media Policy for further detail.

The general rule can be summarised as follows:

Do not disclose information obtained through work unless:

- you do so in the course of your duty;
- you have appropriate authority to do so;
- you are required to do so by law; or
- you are giving evidence in court.

Special rules about the use of personal information under the Privacy Act 1988 also apply to the PCU Group – refer to POL 3005.25 Privacy Policy.

What if I leave PCU?

After ceasing employment, conduct regarding the release of confidential information will continue to apply.

If you intend using information acquired while working for the PCU Group, you must seek permission from the Chief Executive Officer.

In addition, public statements about PCU or its Employees or Directors that are of a derogatory nature, including anything published via the internet or social networking sites, may be subject to legal action.

Honesty

Honesty and trustworthiness are two important foundations of positive stakeholder engagement.

PCU depends on Members and Customers having confidence that funds and information can be safely entrusted to us.

PCU maintains an Employee due diligence process to ensure Employees are able to perform and act in accordance with Fitness and Propriety standards required of a regulated financial institution. PCU assesses the fitness and propriety of its Employees to ensure that it is satisfied that the individual will be:

- Open and honest in all dealings and able to comply with the requirements imposed on them with regard to honesty, integrity and reputation;
- Has the necessary skill to carry on the function they are employed to perform (competency and capability);
- Acts and behaves in a manner that consistently represents a positive and professional alignment to the corporate brand and values, and is compliant with the expectations and requirements of POL 3005.35 Fair Treatment Policy; and
- Is financially sound (with no claims to bankruptcy).

PCU's Employee due diligence process is managed via the candidate selection process for new Employees and the three yearly Employee due diligence check conducted on all existing staff.

Under prudential requirements, PCU must also meet additional requirements regarding the fitness and propriety of individuals who hold positions of responsibility. This increased obligation relates to Responsible Persons including, Directors, Executive Management, Senior Managers and the Internal and External Auditors, and incorporates initial and ongoing annual assessments to demonstrate the required competencies of character, diligence, honesty, integrity and judgment needed for the effective and prudent operation of the Credit Union.

As PCU Employees may have access to large sums of money and/or a large amount of information, absolute assurance of honesty and integrity is expected of all Employees at all times.

Employees shall not knowingly and with intent convert to their own use and benefit any funds, property or information, which is not rightfully theirs, nor knowingly assist another person in any such misappropriation. Any action of this nature shall lead to instant dismissal and potential legal prosecution.

Protection of Employee Accounts

There is a facility to “protect” accounts - to protect Employees from any suspicion of improper action in regard to their personal or related party accounts.

You should advise the Risk & Compliance Department of any accounts with PCU that fall into this category, so they can restrict your access.

Employees/you must never attempt to process transactions or adjust any details on their own personal accounts or the accounts of any related person.

Code of ethics breaches

Report any fraud, suspected fraud, wrongdoing, criminal activity, breaches of the PCU Code of Ethics, Bribes, Improper Payments or Secret Commissions to an Executive Manager, the CEO, or if necessary, to the Protected Disclosure Officer.

PCU’s Protected Disclosure Officer & Whistleblowing Protection Officer is:

Cecilia White, Perks People Solutions or **Collette Ordish**, Perks People Solutions

(W) 8273 9343

(W) 8273 9297

(M) 0403 302 179

(M) 0448 818 895

Email: cwhite@ppsconsulting.com.au

Email: cordish@ppsconsulting.com.au

In accordance with POL 3005.16 Whistleblowing Policy, any information you disclose will be kept in the strictest confidence and will only be disclosed to other persons not connected to the investigation if you have consented to the disclosure, and/or PCU is compelled to do so by law. You must ensure that your disclosure is not done for malicious or vexatious reasons.

Conclusion

PCU place a high value on the ethical conduct and behaviours of all who represent PCU.

We have worked diligently, since our founding in 1970, to be respected as a pillar of ethical conduct. The role of every Employee in this matter is of the highest importance. Failure to comply with this code may lead to disciplinary action. Sanctions under the disciplinary provisions range from counselling to dismissal refer POL 1425 Counselling and Disciplinary Policy for Improved Performance. In some cases, PCU or you as an individual may be liable to criminal or civil prosecution.

The PCU Group has available on the MyPCU Intranet via your work computer, all relevant Policies, Procedures and Codes relating to your employment.

For clarification regarding this policy please refer to:

Costa Anastasiou

Chief Executive Officer

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Annual Policy and Control Attestation:

In completing this attestation and as the Responsible Officer for the implementation of this policy, I confirm that following reasonable enquiries and to the best of my knowledge, other than previously reported exceptions and/or those provided in support of this attestation, each listed policy requirement has been completed. Any known material exceptions have been reported to the Chief Executive Officer and the Chief Risk Officer.

Costa Anastasiou

Signed

Costa Anastasiou CEO, dated 19 January 2024

Version Control – Material Changes

Version	Effective Date	Changes
1.0 – 1.4	29 March 2023	Prior versions
2.0	27 March 2024	Material changes to version 1.4