

Commonwealth Bank Code of Conduct





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Quote from Chairman Paul O'Malley

"The Code is pivotal to delivering our Purpose and living our Values. The way we deliver better outcomes for our customers is as important as the outcomes themselves."

Message from our CEO

Team,

We come to work each day to build a brighter future for all. This is our purpose – the reason we exist – and it relies on every one of us doing our part to deliver on this promise.

Building a brighter future for all starts with caring for our customers, community and one another, having the courage to lead by example and demonstrating our commitment to doing what's right and getting things done. This is how we show we're worthy of the trust and confidence placed in us as Australia's leading financial institution.

We sometimes face situations where we need to make difficult decisions. This is where our Code of Conduct will help. Our Code of Conduct explains the importance of asking 'Must We?', 'Can We?' and 'Should We?'. Asking 'Should We?' considers whether our actions are consistent with our Group Values, Group Policies and the outcomes we expect.

It guides our decision making so we can do what's right in every situation. Our Code sets clear boundaries for actions that are unethical and provides a roadmap for getting help when we run into unanticipated challenges.

We are all accountable for adhering to this Code. Sometimes it may not be clear what to do. When that happens, ask your Line Manager, Legal or Compliance team, or write to me directly. Despite our best efforts, we know there will be occasions when we get things wrong. When this happens, we need to act with humility and transparency, and put things right, quickly and fairly. We need to reflect on and learn from our mistakes, continually seek ways to improve, and understand the consequences when our actions don't meet the standards of the Code.

The Code of Conduct sets the standards of behaviour, actions and decisions we expect. On its own the Code is just words on paper. Together, we need to turn it into action.

Best regards,
Matt Comyn

Purpose of the Code

The Code sets out expectations for how we act, solve problems and make decisions.

Our Code of Conduct is the ultimate guide for how we do things at the Commonwealth Bank. It describes the standards of conduct we expect. The Code connects our Purpose, Values, and key Group Policies, with a series of questions: 'Must We', 'Can We' and 'Should We?', to help us to deliver the right outcomes for all our stakeholders.

We all need to live by the Code every day. It applies to every single one of us, including Board Members, employees and contractors. No one is exempt. And it applies to how we interact with everyone we encounter, both at work and outside of work – colleagues, customers, clients, shareholders, regulators, government, business partners, suppliers, competitors, and the wider community.

Before taking any action, we must consider its impact and outcomes. Firstly, we must ensure that we comply with legal and regulatory obligations. Secondly, we cannot take action that is inconsistent with those obligations. Thirdly, if we can do something, we need to ask 'Should We?', that is, do I understand the impact on relevant stakeholders and is the action consistent with our Group Values and Policies and the outcomes we expect.

What we expect of you

- Read the Code, so you know where to find answers when you need them.
- Familiarise yourself and comply with the Values, key Group Policies and the outcomes we expect.
- When making decisions, ask yourself:
  - first, 'Must We?' – is the action required by legal or regulatory obligation? If the answer to this question is 'yes', then the action must be taken, and the questions of 'Can We?' and 'Should We?' do not need to be asked;
  - second, 'Can We?' – is the action consistent with our legal and regulatory obligations? If the answer to this question is 'no', then the action must not be taken, and 'Should We?' does not need to be asked; and
  - third, 'Should We?' – do I understand the impact on customers and other relevant stakeholders? Is the action consistent with our Group Values, Policies and the outcomes we expect (including fair customer outcomes)?
- If anything is unclear, talk to your Line Manager, Compliance, Legal or other colleagues.
- Welcome constructive challenge, and raise concerns and follow through if something doesn't seem right.
- Regularly take time to reflect on how you and your colleagues are contributing to the outcomes we expect.

What you can expect from the Commonwealth Bank

The Commonwealth Bank is committed to bringing the Code to life by ensuring that all of our activities and decisions deliver the outcomes we want to achieve.

This includes

- Clear and consistent expectations that everyone must adhere to the Code, and consequences for those who do not.
- Help in navigating tough situations.
- Safe avenues and formal processes to raise issues without fear of reprisal when you SpeakUP.

Following the Code is mandatory

- The Code applies to everyone in the Group.
- Following the Code will help us achieve great outcomes, but not following the Code can have serious consequences for you and the Commonwealth Bank, as well as our customers and communities.
- If you don't follow the Code, you will face consequences up to and including dismissal and/or us ending your business engagement.



How to use the Code

Use the Code to help you to do the right thing, including when faced with tough decisions, or when you aren't sure what to do.

Each of us must take personal responsibility to follow the Code and to question if something doesn't seem right, or doesn't reflect our Values and to take action to put it right.

The Code brings together a set of tools to help you navigate the complexity we face every day and help you to do the right thing.

Our Values

Our Values are what we stand for; we need to be guided by them in everything we do.



We care about our customers and each other – we serve with **humility** and **transparency**.



We have the courage to **step in, speak up** and **lead by example**.



We are unwavering in our commitment – **we do what's right** and **we work together** to **get things done**.

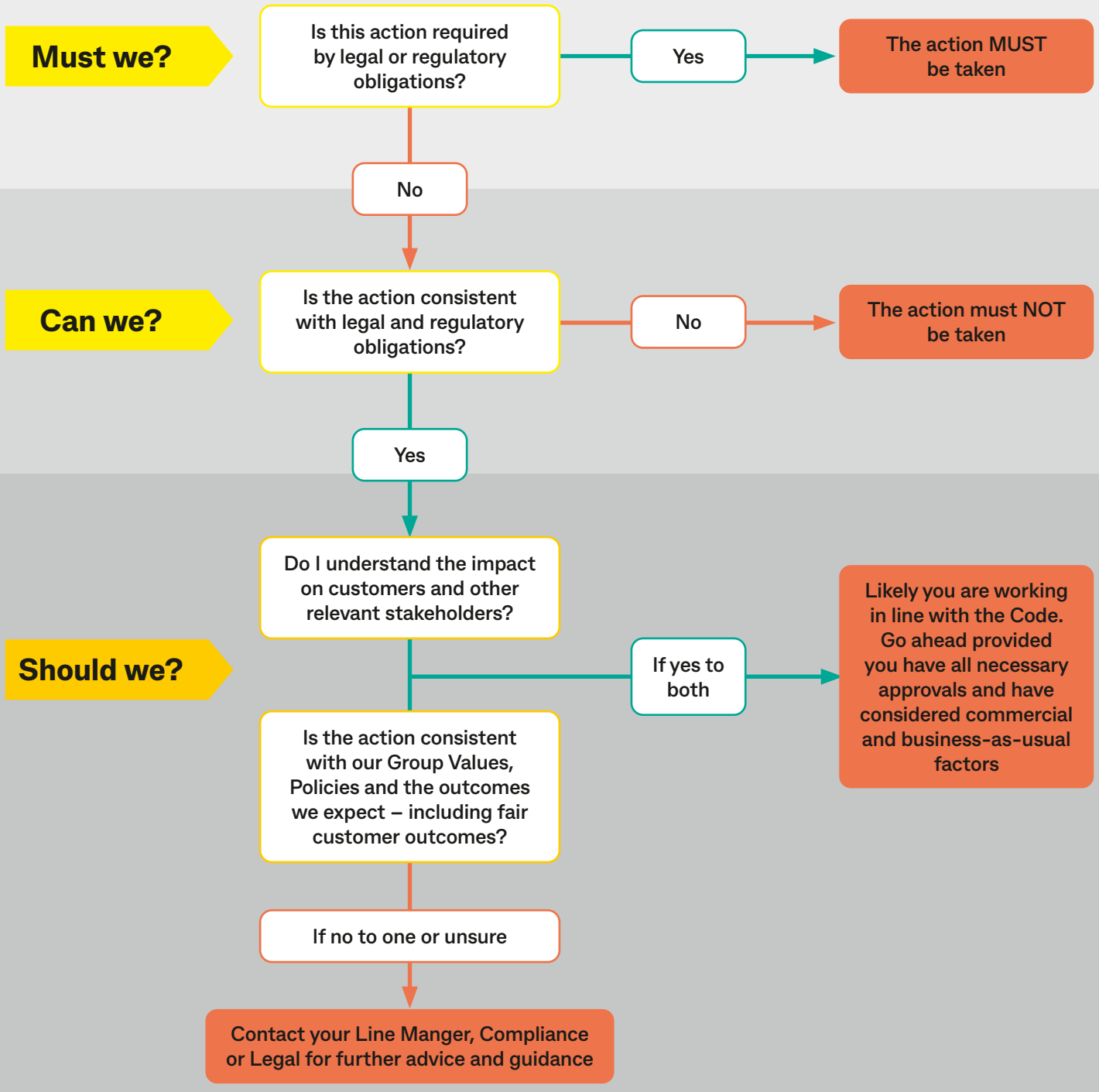
Our purpose is to build a brighter future for all.

Our key questions: ‘Must We?’, ‘Can We?’ and ‘Should We?’

So that we do what’s right, please ask ‘Must We?’ first, and then ‘Can We?’ When we can do something, we must also ask ‘Should We?’

If we make this part of how we operate every day, we’ll be well on our way to building a brighter future for all.

Our customers and the community expect each of us to exercise good judgement. Asking ‘Should We?’ when we can do something is a simple way to make the right decisions and do right by them.



If anything is unclear, talk to your Line Manager, Compliance, Legal or other colleagues.

Speaking up and getting help

We believe that our people want to do the right thing.
But sometimes the right answer isn't obvious.

You might see something that doesn't sit right with you. You might be facing a new situation that no one has had to resolve before. Challenging, taking ownership, seeking guidance and following through are fundamental to ensuring we achieve the right outcomes.

It is up to every one of us to make sure we live by the Code.

If you have questions or concerns, you can always contact your Line Manager, Compliance, Legal or the CEO directly.

We also have a dedicated SpeakUP Service you can use any time, 24/7, to report concerns. Specifically, you can use the Service to raise:

- Issues that affect your role or wellbeing at work.
- Concerns about activities you believe are inconsistent with the Code or could be damaging to our stakeholders or the Commonwealth Bank.

Our Group Whistleblower Policy provides further information on how we will support individuals who may have concerns regarding retaliation for raising issues.

The SpeakUP Service is available 24 hours 7 days a week and can be accessed via the SpeakUP Hotline or SpeakUP Online.

The SpeakUP Hotline is an external service which is staffed by consultants qualified to respond to your concerns. SpeakUP Online is a secure online portal that enables you to contact and interact directly with the internal SpeakUP Team. Using either service enables you to report matters confidentially and anonymously if you so wish. You can be assured that any concerns will be taken seriously and treated confidentially.

You can reach the SpeakUP Hotline at:

Inside Australia: **1800 773 258** (1800 SPEAK UP)

Outside Australia: **+61 2 9151 9156**

Email: **speakup@speakuphotline.com.au**





Our key Group Policies and the outcomes we expect

Our Values guide how we behave. Our actions and decisions need to be consistent with our key Group Policies. Together, our Values and Policies describe the standards of conduct we expect.

We have grouped our key Group Policies and the outcomes we expect into the following three categories to help you locate and access the most relevant to you.

- Customers and Communities
- Governance and Controls
- People

We encourage you to read the policies referenced in the Code for further guidance, in addition to those specific policies relevant to your role and area of business.

Customers and Communities

When making decisions that affect Customers and Communities, apply our Values and the key Group Policies referred to at the bottom of this page to achieve the outcomes we expect.

Outcomes

- Fair customer outcomes are at the heart of our strategy, plans, decisions, judgements and actions.
- Our products and services are fair, transparent, and meet customer needs, and our distribution approach is appropriate for customers. We are compassionate to the circumstances of customers, including those who are most vulnerable.
- The potential for unfair outcomes is proactively identified, and complaints and issues are managed in a timely manner.
- Market manipulation, insider trading, failure to manage conflicts of interest, and inappropriate sharing and use of confidential information are not tolerated.
- We recognise that environmental and social risks can impact our business and communities and we are committed to ensuring that these risks are identified and managed appropriately.

Key Group Policies and related documents

a. Product Development and Distribution

b. Consumer Protection and Anti-Competitive Practices

c. Customer Remediation

d. Customer Complaint Management

e. Environmental and Social

f. Customers in Vulnerable Circumstances

Governance and Controls

When making decisions that affect Governance and Controls, apply our Values and the key Group Policies set out below to achieve the outcomes we expect.

Outcomes

- The standards in our policies and practices are critical to providing fair customer and community outcomes and that the spirit, as well as the letter, of regulations are adhered to.
- Privacy, including our customers' privacy, is respected and personal information and data is kept secure and used responsibly in line with our legal obligations and customer data principles.
- We have comprehensive anti-bribery and corruption, anti-money laundering and counter-terrorism financing obligations, and fraud policies and procedures in place to help protect our community and the integrity of the financial system.
- Our governance arrangements support good decisions and outcomes that align with this Code, our Risk Management Framework, and Risk Appetite Statements.

Key Group Policies and related documents

a. Information Security

b. Privacy

c. Gifts and Entertainment

d. Records Management

e. Anti-Bribery and Corruption

f. Anti-Money Laundering/Counter-Terrorism Financing

g. Fraud Management

h. Delegations of Authority

i. Compliance Incident Management

People

Our people are critical to achieving fair outcomes for customers and communities. When making decisions that affect our people, apply our Values and the key Group Policies set out below to achieve the outcomes we expect.

Outcomes

- Our workplace is safe and inclusive, wellbeing is promoted, and everyone is free from unlawful discrimination, bullying and harassment.
- People are only hired, promoted and rewarded when they demonstrate the highest standards and strong values.
- Individuals act within their authority, and use Group technology, other assets and social media responsibly.
- All individuals complete the training and learning, and competency requirements, and hold any accreditations required for their role.
- Individuals understand and comply with their personal obligations to prevent detriment to the Commonwealth Bank or its stakeholders, including taking steps so that any personal or outside interests do not give rise to a conflict of interest or perceived conflict of interest that is not properly managed.

Key Group Policies and related documents

a. Group Conduct

b. Group Work Health and Safety

c. Inclusion and Diversity

d. Group Personal Trading

e. Physical Security

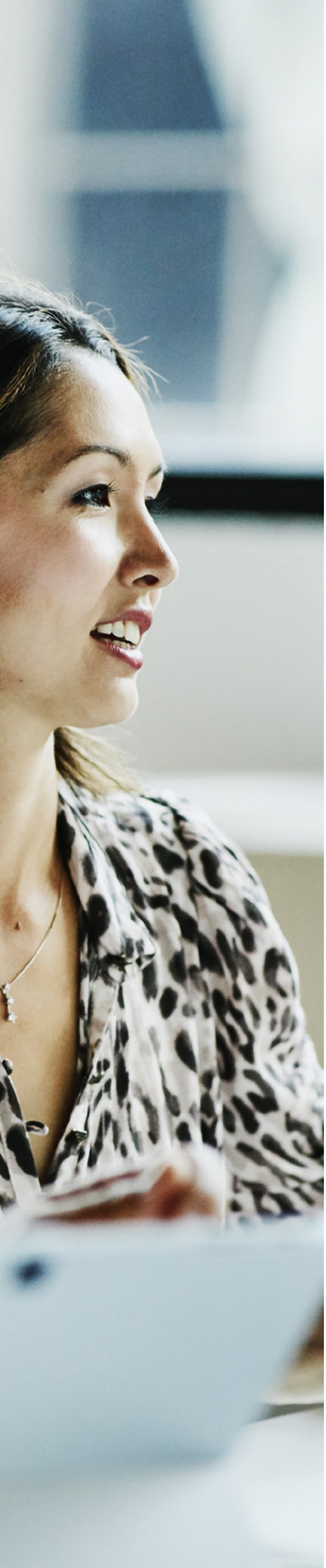
f. External Communication and Engagement

g. Mandatory Learning

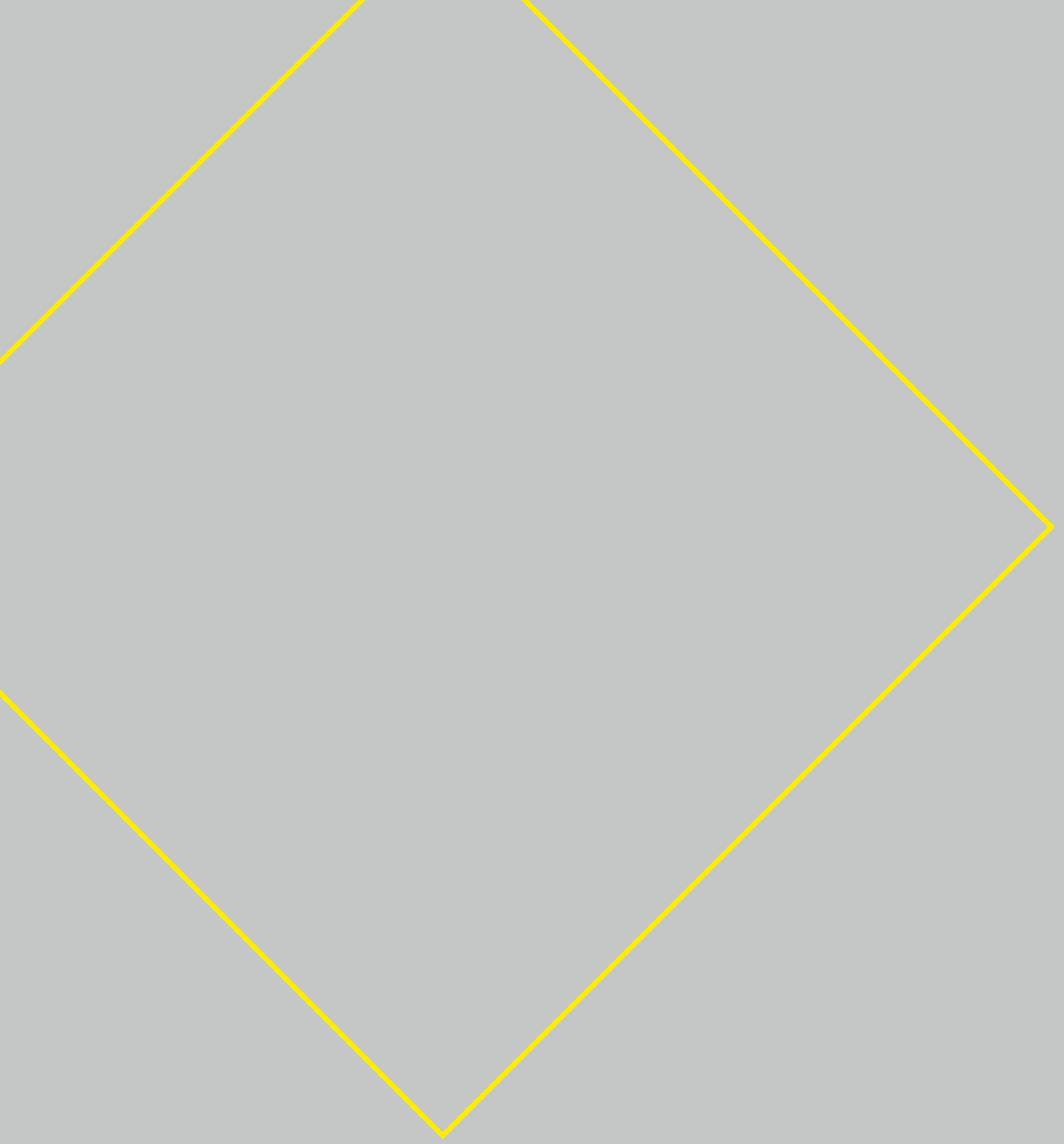
h. Conflicts Management







Notes



This Code may be subject to change from time to time at Commonwealth Bank's discretion. It does not form part of any employee's contract of employment or any industrial instrument that may apply. Where another document refers to the Statement of Professional Practice or Our Commitments, or any obligation to comply with it, that reference should be read as a reference to the Code of Conduct.

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