

# **BEYOND BANK AUSTRALIA**

## **Policy: Fit and Proper**

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### **An overview of this Policy:**

The aim of this policy is to:

1. ensure compliance with Prudential Standard CPS 520 Fit and Proper ('CPS 520');
2. ensure, as far as possible, that directors, senior managers and other persons holding Responsible Person positions with Beyond Bank Australia are fit and proper persons to occupy the positions they hold;
3. provide guidelines on the application of CPS 520;
4. provide the minimum standards for determining the fitness and propriety of persons who hold or are being considered for appointment to a responsible person position;
5. strengthen the governance framework within Beyond Bank Australia's operations; and
6. promote confidence in the Beyond Bank Australia Group and its officers.

### **Who should use this Policy:**

All responsible persons (as defined under sub-heading 1.1.1 of the section 'Obligations of this Policy' below) must adhere to this policy at all times.

### **Member and or internal Customer Service Expectation:**

Beyond Bank Australia members and staff expect that all persons appointed to responsible person positions within the Beyond Bank Australia Group meet the appropriate standards of fitness and propriety.

### **External References applicable to this Policy:**

The Australian Prudential Regulation Authority ("APRA") is the prudential regulator of the Australian financial services industry.

The Beyond Bank Australia Group ("Beyond Bank Australia Group") consists of Beyond Bank Australia ("Beyond Bank Australia") and several controlled entities. Beyond Bank Australia is an authorised deposit-taking institution ("ADI") and is regulated by APRA in accordance with the *Banking Act 1959 (the Act)*. Beyond Bank Australia is the only Beyond Bank Australia Group member that is an ADI. As an ADI, Beyond Bank Australia must adhere to APRA's prudential requirements at all times.

A primary objective of CPS 520 is to ensure that persons who are responsible for the management and oversight of an ADI have appropriate skills, experience, and knowledge, and act with honesty and integrity.

Beyond Bank Australia recognises APRA's statutory powers to direct Beyond Bank Australia to remove a director, senior manager or auditor, and to disqualify a person from being, or acting as, a director or senior manager.

Beyond Bank Australia cannot and will not allow anyone to act as a responsible person for Beyond Bank Australia if that person is a disqualified person under any APRA-administered legislation.

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### **Risk Consequences:**

Beyond Bank Australia risks non-compliance with an APRA Prudential Standard if this policy is not observed by responsible persons.

Non-observance of this policy by responsible persons could place the interests of depositors and other stakeholders of Beyond Bank Australia at greater risk. Beyond Bank Australia needs to ensure that the persons responsible for the management and oversight of the Beyond Bank Australia Group have the appropriate skills, experience and knowledge and act with honesty and integrity (i.e. they are fit and proper).

### **The Obligations of this Policy:**

#### **1. Preamble**

##### **1.1 Responsible Persons**

###### *1.1.1 Definition*

For the purposes of this policy 'responsible person' means:

1. Director (including casual appointment);
2. CEO;
3. Senior Manager (as defined in this policy) of Beyond Bank Australia. In this context the following are considered to be Senior Managers:
  - i. All Group Executives who report directly to the CEO or Deputy CEO;
  - ii. Head of Governance and Assurance; and
  - iii. Responsible Managers (for AFS licence purposes);
4. Managers in Categories G to H. These consist of the senior management group who are either state managers or functional managers who report to an Executive Manager;
5. Responsible Auditor. The Beyond Bank Australia Group considers the Responsible Auditor to be the lead partner of the External Auditor of Beyond Bank Australia;
6. A person who performs activities for a subsidiary of Beyond Bank Australia, where those activities may materially affect the whole or a substantial part of the business of Beyond Bank Australia or its financial standing, either directly or indirectly; and
7. APRA-deemed – any person determined in writing by APRA to have a significant role in relation to the management or control of Beyond Bank Australia, or is responsible for activities which may materially impact on prudential matters.

'Senior Manager' – A Senior Manager, in relation to this Policy, is a person (other than a director) who:

- a) makes, or participates in making, decisions that affect the whole or a substantial part of the business; or
- b) has the capacity to affect significantly the financial standing of the business; or
- c) may materially affect the whole or a substantial part of the business or its financial standing through their responsibility for:
  - i. enforcing policies and implementing strategies approved by the Board; or

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- ii. the development and implementation of systems that identify, assess, manage or monitor risk in the business; or
  - iii. monitoring the appropriateness, adequacy and effectiveness of risk management systems.

Beyond Bank Australia's key persons and responsible managers for the purposes of its Australian Financial Services (AFS) licence and Australian Credit Licence (ACL) are also considered to be Senior Managers for the purposes of CPS 520.

### *1.1.2 Register of responsible persons*

The General Manager People and Culture is responsible for the maintenance of a register of Responsible Persons ("Register") for the Beyond Bank Australia Group.

Human Resources is responsible for updating the Register after any change to responsible persons.

The General Manager People and Culture is responsible for ensuring that the competencies for each responsible person position are documented.

## **1.2 Policy Maintenance**

### *1.2.1 Components*

The Head of Governance and Assurance and General Manager People and Culture are responsible for administrating the system that has been implemented to ensure compliance with CPS 520.

### *1.2.2 Authority to Exercise Rules*

The Board Governance and Remuneration Committee in conjunction with the Head of Governance and Assurance and the General Manager People and Culture are responsible for ensuring the components of the policy are met.

### *1.2.3 Authority to Change Policy*

Proposed changes to the policy must be submitted by the Head of Governance and Assurance to the Board Governance and Remuneration Committee for approval.

### *1.2.4 Policy Review*

The policy is to be reviewed by the Head of Governance and Assurance in conjunction with the General Manager People and Culture, as the need arises or at intervals not exceeding 24 months.

The Head of Governance and Assurance is responsible for identifying any changes to the requirements of CPS 520 and recommending the appropriate policy amendments to the Board Governance and Remuneration Committee.

### *1.2.5 Owner*

The owner of this policy is the Board of Directors. The Board is committed to ensuring that this Policy is fully implemented, and that Beyond Bank Australia's Responsible Persons are and remain compliant with the requirements of CPS 520 and this Policy.

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### **2. Fit and Proper Assessment**

#### **2.1 Definition of 'Fit and Proper'**

CPS 520 does not define the term 'fit and proper' for the purposes of the Standard although it does set out the criteria for meeting the standard in paragraph 18.

#### **2.2 Criteria to determine if a responsible person is fit and proper**

CPS 520 provides that the criteria that must be met for a person to be fit and proper to hold a responsible person position are whether:

1. it would be prudent for Beyond Bank Australia to conclude that the person possesses the competence, character, diligence, honesty, integrity and judgement to perform properly the duties of the responsible person position;
2. the person is not disqualified under the Act from holding the position; and
3. the person either:
  - i. has no conflict of interest in performing the duties of the responsible person position; or
  - ii. if the person has a conflict of interest, it would be prudent for a regulated institution to conclude that the conflict will not create a material risk that the person will fail to perform properly the duties of the position.

A responsible person must exhibit 'diligence, honesty, integrity and judgment'.

In addition to the CPS 520 requirements, responsible persons must also, where relevant, satisfy the criteria, if any, in the:

1. Corporations Act;
2. CPS 510;
3. Beyond Bank Australia Constitution; and
4. job specification, job description and job statement for a particular responsible person's position.

Under CPS 520, the skills and experience required by each responsible person depend on the person's role. As required by CPS 520, Beyond Bank Australia will consider the nature and extent of a number of matters when conducting fit and proper assessments. These will ordinarily include, when relevant:

#### **Fitness**

1. the person's character, competence and experience relative to the duties of the position involved, including whether the person:
  - a) possesses and demonstrates the necessary cultural fit, skills, knowledge, expertise, diligence and soundness of judgement to undertake and fulfil the particular duties and responsibilities of the position in question; and
  - b) has demonstrated the appropriate competence and integrity in fulfilling occupational, managerial or professional responsibilities previously and/or in the conduct of his/her duties; and

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### **Propriety**

2. whether the person:
  - a) has demonstrated a lack of willingness to comply with legal obligations, regulatory requirements or professional standards, or has been obstructive, misleading or untruthful in dealing with regulatory bodies or a court;
  - b) has breached a fiduciary obligation;
  - c) has perpetrated or participated in negligent, deceitful, or otherwise discreditable business or professional practices;
  - d) has been reprimanded, or disqualified, or removed by a professional or regulatory body in relation to matters relating to the person's honesty, integrity or business conduct;
  - e) has seriously or persistently failed to manage personal debts or financial affairs satisfactorily in circumstances where such failure caused loss to others;
  - f) has been substantially involved in the management of a business or company which has failed, where that failure has been occasioned in part by deficiencies in that management;
  - g) is of bad repute in any business or financial community or any market; or
  - h) was the subject of civil or criminal proceedings or enforcement action, in relation to the management of an entity, or commercial or professional activities, which were determined adversely to the person (including by the person consenting to an order or direction, or giving an undertaking, not to engage in unlawful or improper conduct) and which reflected adversely on the person's competence, diligence, judgement, honesty or integrity.

### **2.3 Additional criteria applying to responsible external auditors**

In addition to meeting the requirements set out in this policy for directors, CEO, senior managers and Managers categories G & H, the Beyond Bank Australia responsible auditor must meet the following additional fitness and propriety criteria. The responsible auditor:

- a) must not be a director or employee of Beyond Bank Australia, or of a related body corporate, within the meaning of section 50 of the Corporations Act 2001;
- b) must be registered as an auditor under the Corporations Act 2001;
- c) must have appropriate formal qualifications and be a member of a recognised professional body;
- d) must have a minimum of five years relevant experience in the industry; and
- e) must be ordinarily resident of Australia.

### **2.4 Banking Act Provisions – Disqualified Persons**

The Act contains provisions relating to disqualified persons (sections 19 to 23), which gives APRA the power to remove 'disqualified' persons from acting for an ADI.

These legislative powers given to APRA are in addition to the fitness and propriety criteria set out in CPS 520. Section 23(2) of the Act provides APRA with the power to remove an ADI director or senior manager if they do not meet one or more of the

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criteria for fitness and propriety, provided that an officially issued prudential standard exists that sets out the relevant criteria.

A person is a *disqualified person* (according to the following definition, taken from Section 20 of the Act) if:

- a) The person has been convicted of an offence against or arising out of:
  - i. This Act; or
  - ii. The Financial Sector (Collection of Data) Act 2001; or
  - iii. The Corporations Act 2001, the Corporations Law that was previously in force, or any law of a foreign country that corresponds to that Act or to that Corporations Law; or
- b) The person has been convicted of an offence against or arising out of a law in force in Australia, or the law of a foreign country, where the offence related or relates to dishonest conduct, or to conduct relating to a company that carries on business in the financial sector; or
- c) The person has been or becomes bankrupt; or
- d) The person has applied to take the benefit of a law for the relief of bankrupt or insolvent debtors; or
- e) The person has compounded with his or her creditors; or
- f) the Federal Court of Australia has disqualified the person under section 21; or
- g) The person has been disqualified under the law of a foreign country from managing, or taking part in the management of, an entity that carries on the business of banking or insurance or otherwise deals in financial matters.

### **3. Assessment Process**

#### **3.1 Overview of Process and Timing**

Wherever possible the fitness and propriety of a responsible person must be:

1. assessed prior to their initial appointment or at the latest within 28 days of the person's appointment to the responsible person position; and
2. reassessed annually (or as close to annually as practicable).

##### *3.1.1 Candidates – directors' election*

The Nomination Committee must assess each person who is nominated as a candidate for a directors' election and determine whether it is satisfied that the person is fit and proper to be and act as a director by reference to this Policy.

The fit and proper assessment has two components, these being:

1. assessing whether the person has demonstrated an ability (as assessed against the model criteria) to be a director; and
2. assessing whether the person is fit and proper to be and act as a director, by reference to Beyond Bank Australia's fit and proper policy.

This assessment must, wherever possible, be completed before the ballot material is sent to members or at the latest within 28 days of the person's appointment as a director.

##### *3.1.2 All other appointments to responsible person positions*

This assessment must, wherever possible, be completed before the person is appointed to the responsible person position or at the latest within 28 days of the person's appointment to the responsible person position.

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### 3.1.3 Responsible auditor

This assessment must, wherever possible, be completed before the person is appointed to the responsible auditor position or at the latest within 28 days of the person's appointment to the responsible auditor position.

Beyond Bank Australia will require the Responsible Auditor to declare that he or she meets the requirements of this policy in the audit firm's annual engagement letter which is considered by the Board Audit Committee.

### 3.2 Interim appointments

Interim appointments to a responsible person position may be made without the need to conduct a full fit and proper assessment for a period of 90 days (or longer with APRA's agreement) including any prior period of interim appointment.

Prior to making such appointment, Beyond Bank Australia will take reasonable steps as specified in this policy to assess the fitness and propriety of the person. If the person is to be appointed to the responsible person position on a permanent basis, Beyond Bank Australia will complete a full fit and proper assessment prior to his/her appointment.

### 3.3 Assessment of fitness and propriety

For a person to be regarded as Fit and Proper:

In relation to individual directors	In relation to the CEO	In relation to the Responsible Auditor	In relation to Senior Managers, Managers categories G & H and persons who perform activities for a subsidiary and are considered to be responsible persons
the Nomination Committee must be satisfied that the individual director or candidate for a directors' election:	the Board must be satisfied that the CEO:	the Board Audit Committee must be satisfied that the Responsible Auditor:	the General Manager People and Culture, in conjunction with the CEO, must be satisfied that the Person:

1. has satisfied all the requirements of the fit and proper declaration;
2. has satisfied all the fit and proper checks;
3. is competent to perform the duties of the responsible person position. This assessment may include:
  - i. candidate for a directors' election – assessment criteria;
  - ii. incumbent director – Board/director appraisal;
  - iii. senior manager and Managers categories G & H – performance assessment; and
  - iv. applicant for responsible person position – assessment against the job description.

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All responsible persons, prior to or on appointment and then annually, must complete a declaration to the effect that they remain a Fit and Proper person as defined in the prudential standard and this policy.

All responsible persons and applicants for responsible person positions must provide their consent to a Police check on request for the purposes of this policy.

All persons recruited externally for appointment to a responsible person position must, if requested, provide a Police check obtained for purposes of the appointment or proposed appointment to the responsible person position.

All current employees appointed or proposed to be appointed to a responsible person position must, if requested, provide a Police check which must not have been obtained more than 24 months prior to the date of appointment or proposed appointment to the responsible person position.

### 3.3.1 Fit and Proper Checks

A schedule of checks to be undertaken and declarations to be obtained for 'fit and proper' purposes is maintained.

The Fit and Proper Checks (nature and frequency) that will be conducted to assist with the assessment of a responsible person's fitness and propriety are summarised in an appropriate manner.

### 3.3.2 Responsibility for checks, searches, questionnaires and declarations

Responsible Person Position	Responsibility for conduct of Checks
Directors and persons nominated for appointment or election to the Board.	Company Secretary on behalf of the Nomination Committee
All responsible persons with the exception of directors and persons nominated for appointment or election to the Board.	Most senior manager reporting to the General Manager People and Culture
Responsible auditor.	Board Audit Committee

## 3.4 Documentation

Appropriate documentation for each fit and proper assessment will be retained to demonstrate the fitness and propriety of Beyond Bank Australia's current, and recent past responsible persons. Fit and proper documentation to be retained is detailed in the following table.

Documentation	Retention Period*	Method of Retention
Police Check	3 years	File in Register of Responsible Persons
Fit and Proper Declaration	1 year	File in Register of Responsible Persons
Bankruptcy Check	1 year	File bankruptcy check extract in Register of Responsible Persons
APRA Data-Base - Disqualified Persons Check	1 year	File search extract in Register of Responsible Persons
ASIC Disqualified Person Register Check	1 year	File search extract in Register of Responsible Persons

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Documentation	Retention Period*	Method of Retention
Eligibility Declaration (Directors)	3 years	File in Register of Responsible Persons
Google General Search	n/a	n/a

\* Record to be updated when latest check conducted and documentation will be kept for 7 years.

Responsibility for retaining documentation:

Assessment	To be retained by
Directors	Human Resources department
All other responsible persons	Human Resources department

### 4. Fit and Proper Breaches

Non-compliance with the requirements of this Policy will be considered a 'breach'. A breach may materialise the risk consequences detailed in the section 'Risk Consequences' on page 1 of this policy.

A responsible person considered to be in breach will be provided the opportunity to submit any additional information in support of his/her fit and proper assessment. This additional information must be taken into consideration before a final determination as to his/her fitness and propriety is made and a recommendation of remedial action is made.

#### 4.1 Process for handling breaches

Remedial action will be taken to either:

1. remedy the breach and result in the person satisfying the fit and proper assessment criteria. This may involve additional training for the person; or
2. ensure the person is not appointed to, or does not continue to hold, a responsible person position.

##### 4.1.1 Breach by CEO

The action to be taken will be determined by the Board Chair in conjunction with the Deputy Board Chair. The result of the action/s taken must ensure that Beyond Bank Australia is compliant with this policy.

##### 4.1.2 Breach by Senior Manager, Managers categories G & H and person who performs activities for a subsidiary and is considered to be a responsible person

The action to be taken will be determined by the General Manager People and Culture in conjunction with the CEO. The result of the action/s taken must ensure that Beyond Bank Australia is compliant with this policy.

If a person is assessed as unfit for a particular responsible person position because of a lack of competence for that specific position, or because of a conflict of interest that applies to the duties of that specific position, he/she may still be fit and proper for another responsible person position.

Where a person is assessed not fit and proper for one responsible person position due to a lack of character, diligence, honesty, integrity or judgment, Beyond Bank

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Australia will assume that the person is not suitable for any responsible person position.

#### 4.1.3 Breach by Director

If a director is assessed as not being fit and proper, the action to be taken will be as follows:

Person in Breach	Action to be taken will be addressed by:				
<b>Director</b> (not being the Chair of a Board Committee or Board Chair)	Board Chair	<i>In conjunction with the</i>	Chair of Nomination Committee	<i>or</i>	Chair of Board Governance and Remuneration Committee if Board Chair is also Chair of the Nomination Committee.
<b>Chair of the Board Governance and Remuneration Committee</b>	Board Chair	<i>In conjunction with the</i>	Chair of Nomination Committee	<i>or</i>	Chair of Board Risk Committee if Board Chair is also Chair of the Nomination Committee.
<b>Chair of the Board Audit Committee</b>	Board Chair	<i>In conjunction with the</i>	Chair of Nomination Committee	<i>or</i>	Chair of Board Governance and Remuneration Committee if Board Chair is also Chair of the Nomination Committee.
<b>Chair of the Board Risk Committee</b>	Board Chair	<i>In conjunction with the</i>	Chair of Nomination Committee	<i>or</i>	Chair of Board Governance and Remuneration Committee if Board Chair is also Chair of the Nomination Committee.
<b>Chair of the Nomination Committee</b> (not being the Board Chair)	Board Chair	<i>In conjunction with the</i>	Deputy Board Chair	<i>or</i>	Chair of the Board Governance and Remuneration Committee or the Chair of the Board Risk Committee as appropriate.
<b>Board Chair</b>	Board Deputy Chair	<i>In conjunction with the</i>	Chair of the Nomination Committee	<i>or</i>	Chair of the Board Governance and Remuneration Committee or the Chair of the Board Risk Committee as appropriate.

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Person in Breach	Action to be taken will be addressed by:				
<b>Board Deputy Chair</b>	Board Chair	<i>In conjunction with the</i>	Chair of the Nomination Committee	<i>or</i>	Chair of the Board Risk Committee or the Chair of the Board Audit Committee as appropriate.

The result of the action(s) taken must ensure that Beyond Bank Australia is compliant with this policy.

#### 4.1.4 Breach by Responsible Auditor

The action to be taken will be determined by the Board Audit Committee. The result of the action/s taken must ensure that Beyond Bank Australia is compliant with this policy.

#### 4.1.5 APRA Orders – Disqualification or Removal

Beyond Bank Australia will remove a responsible person when directed by APRA, and will respond to any order by APRA disqualifying a person from acting as a responsible person or imposing conditions on their role as a responsible person. Disqualification takes immediate effect and Beyond Bank Australia must apply to APRA to have a responsible person ‘undisqualified’ if it wishes to retain the person in their current role.

Any person subject to removal or disqualification order by APRA may request APRA to review their decision (via the CEO/Board Chair) and may appeal any adverse decision to the Administrative Appeals Tribunal.

#### 4.1.6 Discretionary Powers

The Board, CEO, Nomination Committee and General Manager People and Culture have the authority to exercise discretion in circumstances where there is evidence that a responsible person has breached the requirements of this policy and CPS 520.

In exercising any discretion, the CEO, General Manager People and Culture and/or the Nomination Committee must ensure the objectives of the Prudential Standard CPS 520 and this policy are upheld. The discretion will be exercised, taking into account factors such as:

1. position and role the responsible person occupies in the organisation;
2. materiality of the breach;
3. elapsed time since the breach;
4. repetition or duration of the behaviour that resulted in the breach; and
5. impact of the breach.

#### 4.1.7 Internal breach reporting

All breaches must be reported to the General Manager People and Culture who will ensure the Register – Fit and Proper Breaches is completed. The CEO must be informed of all breaches. The Register must be tabled at the next Beyond Bank Australia Board meeting after the breach has occurred.

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Section 5.3 of this Policy documents the actions that must be taken in informing APRA if a responsible person is not assessed fit and proper.

### **5. Notification and Reporting**

#### **5.1 Public disclosure**

A copy of this policy will be made accessible via the Beyond Bank Australia website.

#### **5.2 Policy awareness**

##### *5.2.1 Provision of policy prior to appointment*

A copy of this policy will be provided to:

1. persons who are nominated for a directors' election (elected directors);
2. persons being considered for appointment to the Board (appointed directors);
3. all persons being considered for appointment to a responsible person position.

Responsibility:

- Company Secretary – Persons seeking appointment to the Board.
- Most senior manager reporting to the General Manager People and Culture – all other persons seeking appointment to a responsible person position.

##### *5.2.2 Responsible persons*

All responsible persons must be issued or referred to a copy of this policy and are required to sign a declaration that they have read and understood the Policy and agree to its requirements.

Responsibility:

- Most senior manager reporting to the General Manager People and Culture.

#### **5.3 Risk management**

This fit and proper policy forms part of the Beyond Bank Australia risk management system required under Prudential Standard APS 310 Audit and Related Arrangements for Prudential Reporting. The National Risk and Compliance Manager has responsibility for the Beyond Bank Australia risk management system.

#### **5.4 Informing APRA**

##### *5.4.1 Responsible person details*

Beyond Bank Australia will provide the following details on responsible persons to APRA:

1. a list of current responsible persons within 28 days of CPS 520 applying to them; and
2. any changes to responsible persons due to appointments, resignation, retirement or removal within 28 days of any change.

Details for each responsible person will include the person's:

1. full name;
2. date of birth;
3. position and main responsibilities;

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4. statement of whether the person has been assessed under the Beyond Bank Australia Fit and Proper criteria; and
5. any other information that may be requested from time to time.

#### *5.4.2 Responsible person assessed not fit and proper*

Beyond Bank Australia will notify APRA within 10 business days if a responsible person is assessed not fit and proper. If that person remains in the responsible person position, the notification to APRA will state the reason for this and the action that is being taken.

#### *5.4.3 APRA requests*

Beyond Bank Australia will comply with any request by or requirement of APRA to obtain information relevant to the responsible person including:

1. criminal history;
2. any relevant civil proceedings;
3. enquiries with the police, regulators, professional bodies or any other source; and
4. any other information relevant to fitness and propriety.

#### *5.4.4 Responsibility for APRA reporting*

Reporting to APRA the matters referred to under heading 5.4.1 above:

- Director related – Company Secretary
- Non director related – Most senior manager reporting to the General Manager People and Culture.

The most senior manager reporting to the General Manager People and Culture is responsible for reporting to APRA the matters referred to in sections 5.4.2 and 5.4.3 of this Policy.

#### *5.4.5 Person who held a responsible person position*

Beyond Bank Australia consents to any person who held a responsible person position disclosing information or providing documents to APRA relating to his/her reasons for resignation, retirement or removal.

## **6. Whistleblowing**

### **6.1 Protection**

Beyond Bank Australia will take all reasonable steps to ensure that persons making disclosures, in good faith, as per 6.2, 6.3 and 6.4 below, are not subject to, or threatened with, a detriment because of any notification in compliance with the requirements of this policy.

### **6.2 Director**

Where a Beyond Bank Australia director considers that a responsible person does not meet the Fit and Proper criteria, the director is strongly encouraged to notify the CEO or Board Chair.

### **6.3 Staff member**

Where any Beyond Bank Australia Group employee believes that a responsible person does not meet the Fit and Proper criteria, the employee is strongly

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encouraged to notify the General Manager People and Culture (or the CEO if the responsible person is the General Manager People and Culture).

#### **6.4 Notifying APRA**

If a director or employee believes that Beyond Bank Australia has not dealt with the matter in a satisfactory manner, they should then notify APRA of their concerns