



## Independent assurance report under the CBA Covered Bond Trust Cover Pool Monitor Agreement dated 15 November 2011 and as amended (the Agreement) and engagement letter dated 18 January 2024 (the Engagement Letter)

To the Directors and Authorised Officers of Commonwealth Bank of Australia (Issuer or CBA) and Securitisation Advisory Services Pty. Limited (Trust Manager) and the Directors and Authorised Officers of Deutsche Trustee Company Limited (Bond Trustee), Perpetual Corporate Trust Limited (Covered Bond Guarantor) and P.T. Limited (Security Trustee).

### **Conclusion**

We have undertaken a limited assurance engagement on the Trust Manager's compliance, in all material respects, with the requirements to keep an accurate register of the assets in the cover pool as evaluated against the Section 30(4)(a) of the Banking Act (the Act), for the period from 1 November 2022 to 30 April 2023 (Assessment Period).

We have also undertaken a limited assurance engagement on the Issuer's compliance, in all material respects, with the requirements to keep assets that may be in the cover pool and maintenance of the cover pool as evaluated against sections 31 and 31A of the Act during the Assessment Period.

### **Limited assurance engagement on compliance with the requirement to the keep an accurate register of the assets in the cover pool**

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that Trust Manager has not complied, in all material respects, with the requirements to keep an accurate register of the assets in the cover pool as evaluated against Section 30(4)(a) of the Act during the Assessment Period.

### **Limited assurance engagement on compliance with the requirements to keep assets that may be in the cover pool and the maintenance of the cover pool**

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Issuer has not complied, in all material respects, with the requirements to keep assets that may be in the cover pool and maintenance of the cover pool as evaluated against sections 31 and 31A of the Act during the Assessment Period.

### **Basis for conclusion**

We conducted our engagement in accordance with Standard on Assurance Engagements ASAE 3100 *Compliance Engagements* issued by the Auditing and Assurance Standards Board.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

### **Respective responsibilities**

The Trust Manager is responsible for keeping an accurate register of the assets in the cover pool as defined in section 30(4)(a) of the Act, identifying risks that threaten compliance with that section, designing and operating controls which will mitigate those risks, and monitoring ongoing compliance.



The Issuer is responsible for selecting assets that may be in the cover pool and the maintenance of those assets as required under sections 31 and 31A of the Act, identifying risks that threaten compliance with the requirements those sections, designing and operating controls which will mitigate those risks, and monitoring ongoing compliance.

### **Our Independence and quality management**

We have complied with the ethical requirements, of the Accounting Professional and Ethical Standard Board's APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)* relevant to assurance engagements, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour.

Our firm applies Australian Standard on Quality Management ASQM 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Reports and Other Financial Information, or Other Assurance or Related Services Engagements*, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

### **Our responsibilities**

Our responsibility is to express a limited assurance conclusion on the Trust Manager's and Issuer's compliance, in all material respects, with the compliance requirements as described in Part A and Part B below for the Assessment Period. ASAE 3100 requires that we plan and perform our procedures to obtain limited assurance about whether anything has come to our attention that, the Trust Manager and the Issuer have not complied, in all material respects, with the requirement to keep an accurate register of the assets in the cover pool as defined in section 30(4)(a), 31 and 31A of the Act for the Assessment Period.

In a limited assurance engagement, the assurance practitioner performs procedures, primarily consisting of discussion and enquiries of management and others within the entity, as appropriate, and observation and walk-throughs and evaluates the evidence obtained. The procedures selected depend on our judgement, including identifying areas where the risk of material non-compliance with the compliance requirements of sections 30(4)(a), 31 and 31A of the Act are likely to arise.

Given the circumstances of the engagement, in performing the procedures listed above, we:

- Through discussion, enquiries and observation, obtained an understanding of Trust Manager's and Issuer's compliance framework and internal control environment to meet the compliance requirements, as stipulated in Part A and Part B below.
- Through discussion, enquiries, observation and walk-throughs, obtained an understanding of Trust Manager's and Issuer's compliance activities that are undertaken to meet the compliance requirements, as stipulated in Part A and Part B below.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and consequently the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Accordingly, we do not express a reasonable assurance opinion on compliance with the with the sections 30(4)(a), 31 and 31A of the Act.



We believe that the evidence we have obtained in Part A and Part B is sufficient and appropriate to provide a basis for our conclusion.

**Part A – Review of the compliance with the requirement to keep an accurate register of the assets in the cover pool**

Our limited assurance engagement has been conducted in accordance with the Standard on Assurance Engagements ASAE 3100 *Compliance Engagements* issued by the Auditing and Assurance Standards Board to provide limited assurance on the Trust Manager's compliance with the requirement to keep an accurate register of the assets in the cover pool as evaluated against section 30(4)(a) of the Act. The register of assets in the cover pool for this purpose is the register maintained by the Trust Manager containing the following data fields in the Helios Securitisation System (Helios):

- i. Loan Identification Number
- ii. Security Value (as determined by CBA's policy for the valuation of a security interest in a residential mortgage)
- iii. Principal Balance Outstanding (excluding any adjustments for collective provisioning or other provision made by CBA)
- iv. Post Code of the residential mortgage.
- v. Loan origination date
- vi. Deposit remaining in GIC Account (Principal ledger)
- vii. Demand Loan Advance (unallocated)
- viii. Substitution Assets Balance

Our procedures included enquiries of the Trust Manager and examining, on a sample basis, evidence supporting the compliance by the Trust Manager with the requirement to maintain an accurate register of assets in the cover pool as required under section 30(4)(a) of the Act. These procedures have been undertaken to form a conclusion as to whether anything has come to our attention that causes us to believe that the Trust Manager did not maintain, in all material respects, effective control procedures in relation to the keeping of an accurate register of the assets in the cover pool per section 30(4)(a) of the Act during the Assessment Period.

**Part B – Review of compliance with the requirements of sections 31 and 31A of the Act**

Our limited assurance engagement has been conducted in accordance with Standard on Assurance Engagements ASAE 3100 *Compliance Engagements* issued by the Auditing and Assurance Standards Board to provide limited assurance on the Issuer's compliance with the requirements of sections 31 and 31A of the Act. Our procedures included enquiries of CBA and examining, on a sample basis, evidence



supporting compliance with the requirements of sections 31 and 31A of the Act. These procedures have been undertaken to form a conclusion as to whether anything has come to our attention that causes us to believe that CBA did not comply, in all material respects, with the requirements of sections 31 and 31A of the Act during the Assessment Period.

### **Inherent limitations**

Because of the inherent limitations of an assurance engagement, together with the internal control structure it is possible that fraud, error, or non-compliance with compliance requirements may occur and not be detected.

As the systems, procedures, and controls to ensure compliance with applicable requirements of the Act are part of the operations of the Issuer or the Trust Manager, it is possible that either the inherent limitations of the general controls structure, or weaknesses in it, can impact on the effective operation of the specific controls of the Issuer or the Trust Manager. Further, the internal control and compliance framework, within which the control procedures that we have reviewed operate, has not been reviewed and no view is expressed as to its effectiveness.

A limited assurance engagement for the Assessment Period does not provide assurance on whether compliance with the requirements of sections 30(4)(a), 31 and 31A of the Act will continue in the future.

### **Use of report**

In accordance with section 30(5) of the Act and section 2.4 of the Cover Pool Monitor Agreement, we have also agreed with the Directors and Authorised Officers of the Issuer, the Trust Manager, Deutsche Trustee Company Limited, Perpetual Corporate Trust Limited, and P.T. Limited to provide them with this report or a copy of it.

We disclaim all responsibility and liability for the consequences of any use or reliance on this report by any person (including without limitation a person who accesses this report from a website) who is not referred to in the preceding paragraph and we disclaim all responsibility and liability for the consequences of any use or reliance on this report by any person (including those referred to in the preceding paragraph) for any purpose other than that for which it was prepared under section 30(4)(c) of the Act or in accordance with the Cover Pool Monitor Agreement.

In carrying out the function of Cover Pool Monitor under section 30(4)(c) of the Act, we also make this report available to CBA for distribution to the holders of covered bonds or their representatives.

A handwritten signature in blue ink that reads 'PricewaterhouseCoopers'.

PricewaterhouseCoopers

A handwritten signature in blue ink that reads 'Alastair Findlay'.

Alastair Findlay  
Partner

Sydney  
19 February 2024