

CBA NV Code of Conduct

1. Purpose of the Code of Conduct

The Code sets out expectations for how we act, solve problems and make decisions. It is integral to our license to operate as a bank and provides the foundation for the way we do business at CBA Europe N.V.

It describes the standards of conduct we expect. The Code connects our Purpose, Values, and Expectations (with a 'Should we?' test) and key Policies to help us to deliver the right outcomes for all our stakeholders.

We all need to live by this 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 work – colleagues, customers, clients, shareholders, regulators, government, business partners, suppliers, competitors, and the wider community.

In addition, CBA Europe N.V. supports principles of the Dutch Banking Code.

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 Value Expectations, including the 'Should We?' test, key policies and outcomes we expect.
- If anything is unclear, talk to your Manager and 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 colleague are contributing to the outcomes we expect.
- If you supervise, manage or direct the work of others, you need to understand our 'Additional Expectations for Leaders' in the Code of the Conduct.

What you can expect from the CBA Europe N.V.

We are committed to bringing the Code to life by ensuring that all of our activities and decisions deliver the outcomes we want to achieve. You can expect:

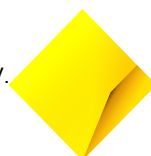
- Clear and consistent expectations that everyone adheres to the code, and consequences for those who do not.
- Help in navigating tough situations.
- Safe environment when you speak up to your Manager, HR or you can contact the CBA Europe N.V. SpeakUp Service.

Following the Code is mandatory

- The Code applies to everyone in CBA Europe N.V.
- Following the Code will ensure we achieve great outcomes, but not following the Code can have serious consequences for you and CBA Europe N.V., 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.

2. 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 Expectations, 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 to help you do the right thing.

3. Our Values

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

Care

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

Courage

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

Commitment

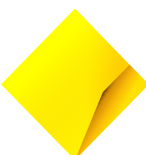
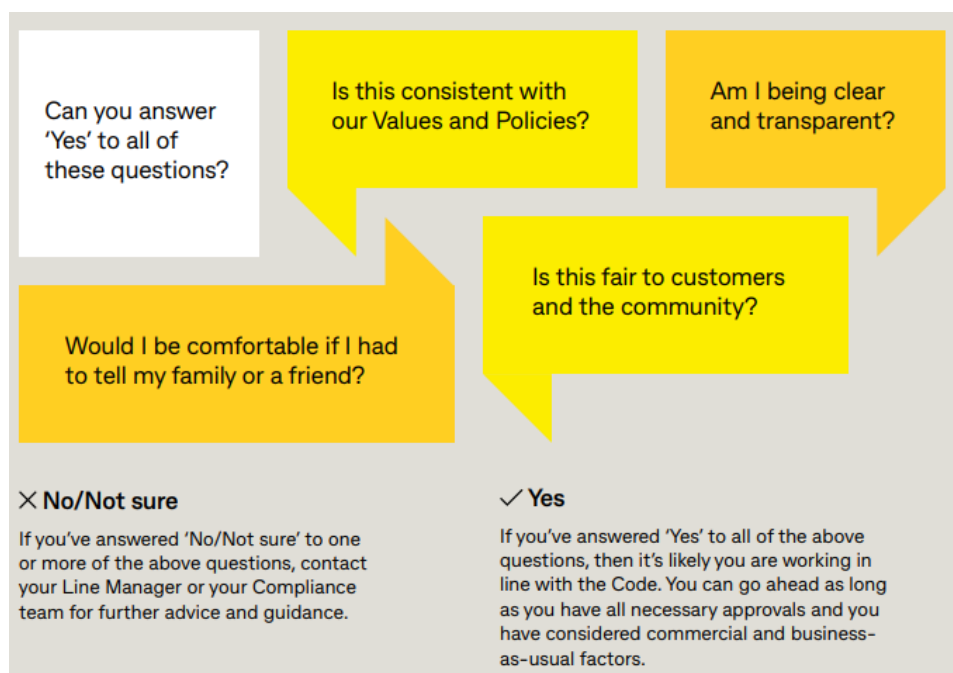
We are unwavering in our commitment – **we do what's right** and **we work together** to **get things done**.

4. Our 'Should We' test

To ensure we do what's right, please use our 'Should We?' test. Asking 'Can We?' isn't always enough. We also need to ask: 'Should we?'

If we make this part of how we operate every day, we'll be well on our way to building a better bank

Our customer and the community expect each of us to exercise good judgment. Asking 'Should we?' is a simple way to ensure that we make the right decisions and do right by them.



5. 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 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 this Code.

If you have questions, you can always contact your Line Manager, Your HR Manager, the CBA Europe N.V. SpeakUP Service or the CEO directly, Wilco Hendriks (Wilco.Hendriks@cba.com.au).

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 CBA N.V.

Our Whistleblowing 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 The Netherlands: 0800-0270001
- Outside The Netherlands on +31 800-0270001
- Email: speakup@speakuphotline.com.au

SpeakUP Online is available through the SpeakUP App on One.CBA

6. Our policies & guidelines and the outcomes we expect

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

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

- **Customers and Communities**
- **Governance & Controls**
- **People**

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



6.1 Customers and Communities

When making decision that affect Customers and Communities, apply our Value Expectations and the following policies & guidelines to achieve the outcomes we expect.

Outcomes:

- Fair customer outcomes are at the heart of our strategy, plans, decisions, judgments 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 the most vulnerable.
- The potential for unfair outcomes is proactively identified, and complaints and issues are mitigated and managed in a timely manner.
- Market manipulation, insider trading, failure to manage conflicts of interest, and inappropriate control 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.

CBA Europe N.V. themes:

- a) Product Development and Distribution
- b) Customer Protection and Competition
- c) Customer Complaints Management

6.2 Governance and Controls

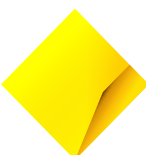
When making decisions that affect Governance and Controls, apply our Value Expectations and the following policies & guidelines to achieve the outcomes we expect.

Outcomes:

- The standards in our policies and practices ensure fair customer and community outcomes and that the spirit, as well as the letter, of the regulations are adhered to.
- Privacy, including of our customers, is respected and personal and confidential information is kept secure, protected from unauthorised use and not inappropriately used for personal gain.
- We can protect our community and the integrity of the financial system, including through meeting our anti-bribery and corruption, and anti-money laundering and counter terrorism financing obligations and managing frauds.
- Our governance supports good decisions and outcomes that align with this Code, Our Risk Management Framework and Risk Appetite Statement.

CBA Europe N.V. themes:

- a) Information Security
- b) Privacy



- c) Gifts and Entertainment
- d) Record Management
- e) Anti-Bribery and Corruption
- f) Anti-money Laundering and Counter Terrorism Financing
- g) Managing Fraud
- h) Delegations of Authority
- i) Compliance Incident Management

6.3 People

Our People are critical to achieving fair outcomes for customers and communities. When making decisions that affect our People, apply our value Expectations and the following policies & guidelines to achieve the outcomes we expect.

Outcomes:

- Our workforce 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 the role.
- Individuals understand and comply with their personal obligations to prevent detriment to CBA Europe N.V. or its stakeholders, including taking steps to ensure that any personal or outside interests do not give rise to a conflict of interest or perceived conflict of interest.

CBA Europe N.V. themes:

- a) Workplace Conduct
- b) Health and Safety
- c) Diversity and Inclusion
- d) Acceptable Use of CBA Technology
- e) Securities Trading
- f) Physical Security
- g) Social Media
- h) Media Contact



- i) Mandatory Training
- j) Conflict of Interest

Policy Governance

Approver	CBA Europe N.V. Management Board
Exemption Authority	N/A – No exemptions permitted
Owner	CBA Europe N.V. Head of Compliance

