

FY23-25 Reconciliation Action Plan | Corrective Statement



During a recent review on progress towards implementing our FY23-25 Reconciliation Action Plan, Commbank identified three statements requiring corrections, due to changes in internal processes or because they require clarification to better reflect our practices. The review did not include a re-review as to the accuracy of all other statements in the FY23-25 Reconciliation Action Plan. This will be carried out in 2025 prior to the publication of the FY26-28 Reconciliation Action Plan. The following table outlines the new text and the previous text and the reasons for the changes.

The corrections have been made in consultation with Reconciliation Australia.

Page	New text	Previous text	Reason for change
12	<p>Through our Environment and Social Framework, we expect our Clients, Suppliers and other business partners to identify, manage, monitor, and redress any adverse impacts on human rights where their business is involved. To support this, Environmental, Social and Governance (ESG) risk assessments are required for institutional corporate lending, Business Banking and Commonwealth Private Bank customers with current or proposed commercial or corporate lending greater than or equal to \$1.5 million¹.</p> <p>These assessments are performed in one of two ways:</p> <ul style="list-style-type: none"> • The Corporate and Institutional Pathway is used to assess larger Business Banking customers managed in the Major Client Group and Regional and Agribusiness Specialised Agribusiness Solutions segments, and all Institutional corporate lending. • The Commercial Pathway is used to assess Business Banking customers managed in the Commercial Banking, Regional and Agribusiness Banking, Small Business Banking segments, customers in transition from Bankwest Business Bank, as well as customers managed in Commonwealth Private Bank. <p>The tool is supported by a set of inherent risk ratings across industry ANZSIC codes for ten key focus areas including: climate and energy; climate physical risk; water; pollution; biodiversity; human rights; Indigenous rights; labour rights and modern slavery; workplace health and safety; and anti-corruption and governance. The tool also includes specific questions aimed at</p>	<p>Through our Environment and Social Framework, we expect our Clients, Suppliers and other business partners to identify, manage, monitor, and redress any adverse impacts on human rights where their business is involved. To support this outcome, we perform Environmental, Social and Governance (ESG) risk assessments on institutional corporate lending and business customers with proposed corporate lending greater than \$1 million.</p> <p>These assessments are performed in one of two ways:</p> <ul style="list-style-type: none"> • The Corporate and Institutional Pathway (business corporate lending greater than \$30 million and institutional corporate lending). • The Commercial Pathway (business corporate lending between \$1 million and \$30 million). <p>The ESG risk assessment tool is supported by a dataset of initial risk ratings across key focus areas, including climate and energy; climate physical risk; water; pollution; biodiversity; human rights; labour rights and modern slavery; workplace health and safety; and anti-corruption and governance. The ESG risk assessment tool is integrated into the Bank's corporate loan pricing system to embed it as part of the corporate lending decision process.</p>	<p>Since we released our RAP in October 2022, changes have been made to our Environmental, Social and Governance (ESG) Risk Assessment process.</p>

assessing whether lending to a customer is aligned to commitments in the E&S Framework.

¹Please note, from March 2023, the threshold for completing ESG risk assessments in Business Banking was updated from \$1 million to \$1.5 million. This may be subject to further change. Since that time, ESG risk assessments have been required as described in the new text above.

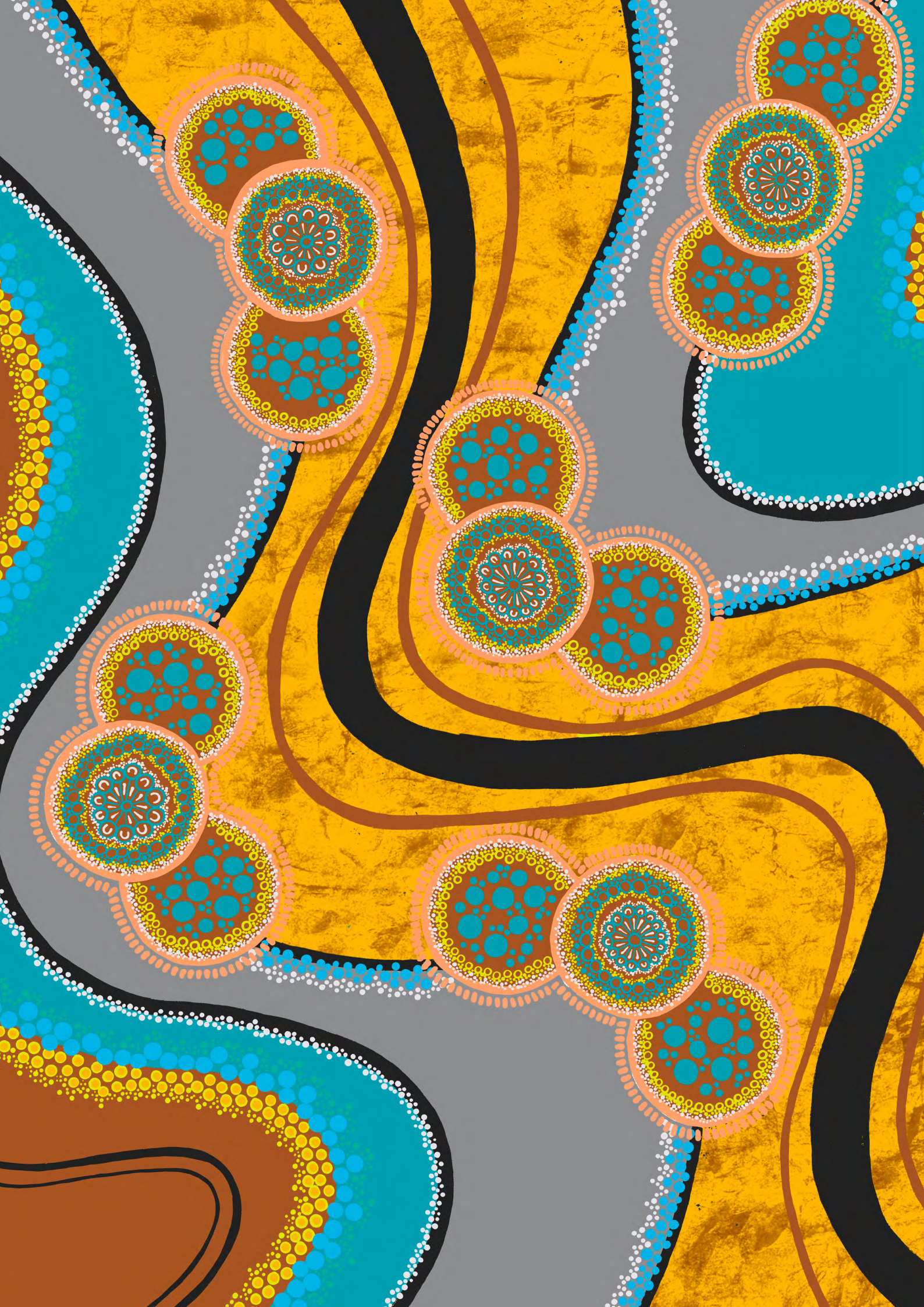
16	Over the last three years, we have increased the unique completion rate of cultural capability from 8 per cent during FY20, to 56 per cent during FY22.	Over the last three years, we have increased the unique completion rate of cultural capability from 8.4 per cent during FY20, to over 62 per cent during FY22.	To determine our training completion rate for Indigenous cultural development, we use Australian Headcount as the denominator. In our 2024 Annual Report, we restated all prior periods to exclude other overseas and service providers from the training completion data to align with this reporting criteria.
23	Review relevant international standards related to the Rights of Indigenous Peoples and embed within our Supplier Code of Conduct.	Review relevant international standards related to the Rights of Indigenous Peoples and embed within our Supplier Code of Conduct and procurement practices.	<p>We have a current commitment to review relevant international standards related to the Rights of Indigenous Peoples and embed within our Supplier Code of Conduct and procurement practices.</p> <p>We have reviewed relevant international standards related to the Rights of Indigenous Peoples. Our refreshed SCOC will be published in FY25 and will include an expectation that our suppliers, domestically and globally, respect the rights of Indigenous people. We do not believe embedding this aspect of the SCOC into our procurement practices will lead to meaningful outcomes. We will continue to focus on strengthening our supplier diversity program.</p>



Reconciliation Action Plan

FY23—FY25





Acknowledgement of Country.

Commonwealth Bank (CommBank) acknowledges the Traditional Owners of the lands across Australia as the continuing custodians of Country and Culture dating back to the creation of the Dreaming.

We pay our respect to First Nations peoples and their Elders, past and present. We acknowledge and celebrate the inherent resilience of Aboriginal and Torres Strait Islander peoples and communities.

We thank the many Aboriginal and Torres Strait Islander employees, external advisers, communities and partner organisations that have guided us through achieving meaningful reconciliation outcomes.

Our RAP artwork.

Co-created by Kuku Yalanji and Woopaburra artist Leona McGrath, Indigenous organisation Yerrabingin, CommBank's Indigenous and non-Indigenous employees, and members of the community, the creative design visually expresses our refreshed brand and values.

The artwork is designed to symbolise the Bank's respect for and celebration of Aboriginal and Torres Strait Islander histories and cultures as part of our Reconciliation Action Plan (RAP).

The design conveys three central themes: Community, Connections and Wellbeing, and pairs some of the CommBank colours with traditional Aboriginal designs to create an artwork and narrative that will conjure connectedness and pride with our customers, communities and our people.

Leona McGrath is a proud Aboriginal woman originally from Queensland from the Woopaburra People of Great Keppel Island and Kuku Yalanji People of Far North Queensland. Leona is a Mother, Grandmother, contemporary Aboriginal artist and a Registered Midwife. Growing up on Gadigal Country, Leona has been blessed with a strong sense of connection to Country by being welcomed into the Community.

Leona has been painting for over 30 years and continues to learn and develop as an artist. Her journey of creating art has enabled her to have a stronger connection to her culture as well as providing opportunities to share and educate the wider community about Aboriginal people and culture. Creating art has inspired Leona to travel on a personal journey of healing and growth.



Our RAP progress.

2020—2022

Launched our sixth RAP, and second Elevate RAP, confirming our support for the Uluru Statement.

Embedded Indigenous rights into Environment and Social Policy.

Embedded Indigenous engagement leads across the business.

Introduced a First Nations employee representative on the Indigenous Advisory Council.

Launched new cultural learning program, supporting 75 per cent of the organisation to complete learning over the RAP reporting period.

2017—2019

Launched fifth RAP and first Elevate RAP.

Announced Indigenous Supplier Diversity target.

Launched IT traineeship program and ES Training Academy.

Supported the establishment of a social enterprise to reduce the financial hardship experienced during times of Sorry Business.

Collaborated with Supply Nation to launch JumpStart.

2015—16

First Indigenous placement to Commonwealth Bank's Graduate Program.

Launched overdraft product for Community Business Finance customers in conjunction with Indigenous Business Australia.

Announced Indigenous employment parity target.

Commenced new round for the Indigenous Financial Counselling Mentorship Program with a further 17 participants.

2012

Graduated first nine participants of Indigenous Financial Counselling Mentorship Program.

Expanded employment program with Indigenous university interns.

Provided 300+ employment opportunities since launch of Indigenous Employment Strategy in 2009.

2013—14

Launched fourth RAP.

Partnered with Jawun to deliver Emerging Leaders Program.

Celebrated 10 years of School Based Traineeships.

Provided \$1m in scholarships through Australian Indigenous Education Foundation over five years.

Graduated a further 10 participants of the Indigenous Financial Counselling Mentorship Program.

Became a partner of Jawun Empowered Communities.

ICAL helped customers get access to cash on more than 21,000 occasions in the last 12 months.

Launched ICAL's Third Party Transfers Service providing customers additional access to funds.

Graduated first class of Indigenous Future Leadership Program.

Transitioned first Community Business Finance customer to mainstream banking.

Launched Indigenous Leadership Program.

2011

Launched third RAP.

First secondees participated in skilled volunteering with Jawun.

Launched Community Business Finance banking and finance packages for Indigenous entrepreneurs.

Developed Financial Services Workshops to provide our people with education and awareness in cultural engagement, government policy, products and services.

2010

Held first Walkabout Your Business Program with Indigenous entrepreneurs.

Launched cultural awareness program for leaders to Bawaka, an Aboriginal homeland.

Partnered with One Laptop Per Child to deliver laptops to schools in remote communities.

Became a partner of Australian Indigenous Mentoring Experience to support mentoring of Indigenous students.

2009

Launched second RAP; created Indigenous Banking Team.

Became Founding Member of Supply Nation.

Launched Indigenous Customer Assistance Line (ICAL) for remote customers.

Launched cultural e-learning module for employees.

Became production partner of Bangarra Dance Theatre.

Became sponsor of National NAIDOC Person of the Year Awards.

Launched Indigenous Employment Strategy with a commitment to provide 350 job opportunities in 3 years.

Created the Indigenous Financial Counselling Mentorship Program with Indigenous Consumer Assistance Network (ICAN).

2002

Established Indigenous School Based Traineeships.

2005

Partnered with ICAN to provide financial education programs in Queensland.

2008

Launched first RAP.

Supported scholarships for Indigenous students via partnership with AIEF.

Established partnerships to support money management programs in APY Lands and Western NSW.

Commonwealth Bank CEO Message.

Through our Reconciliation Action Plan (RAP), we are committed to building a brighter future for Aboriginal and Torres Strait Islander employees, customers and communities.

Twenty years ago our Retail Bank welcomed the first cohort of First Nations school-based trainees, marking the beginning of our commitment to reconciliation and supporting First Nations peoples in achieving their social, cultural and economic aspirations.

In 2008 we launched our first RAP, which stated our long term commitment to building respectful relationships and meaningful opportunities for First Nations peoples. The FY23-FY25 RAP is our third RAP that has received Elevate status from Reconciliation Australia.

While we don't have all the answers to solving some of the most challenging issues impacting First Nations peoples, we strive to set a benchmark for good practice engagement and have designed and delivered our reconciliation program in line with our engagement principles.

We also listen to feedback when we don't get it right and acknowledge the importance of taking a rights-based approach to our reconciliation program. I'd like to extend my gratitude to our Indigenous Advisory Council for their guidance and challenge, and for sharing their knowledge with us.

As the nation begins an important public discussion about constitutional recognition and an Indigenous Voice to Parliament, Commonwealth Bank fully supports the Uluru Statement from the Heart and we are optimistic that this process will lead to improved public policy and economic outcomes for First Nations people.

We're committed to playing our part and through our RAP initiatives, bring reconciliation a step closer. We look forward to continuing this important work as we grow our understanding of First Nations peoples, their cultures and our shared history.

Matt Comyn
Chief Executive Officer
Commonwealth Bank



Reconciliation Australia CEO Statement.

On behalf of Reconciliation Australia, I congratulate Commonwealth Bank on its formal commitment to reconciliation, as it implements its third Elevate Reconciliation Action Plan (RAP).

Commonwealth Bank has a long history of understanding and acting upon its own unique role in advancing reconciliation. Its six previous RAPs laid strong foundations, with its three Elevate RAPs demonstrating its ability to leverage its position as one of Australia's foremost financial institutions to create transformational change, at scale.

Tackling financial abuse experienced by Aboriginal and Torres Strait Islander people, Commonwealth Bank's long-time partnership with community experts has culminated in its relationship with the University of New South Wales Gendered Violence Research Network. Developing a research series to better understand current knowledge of domestic violence and financial abuse in Australia, the second report in its series has greatly informed the commitments in this Elevate RAP. This includes research into social and intergenerational trauma, as well as partnering with First Nations organisations to share findings further afield.

Commonwealth Bank's willingness to engage its expertise and reach to create impact beyond its walls is apparent in its ongoing support for Indigenous Carbon Economies. Here, it supports Aboriginal and Torres Strait Islander communities to receive benefits and economic opportunities through Australia's fast accelerating carbon market. This Elevate RAP sees Commonwealth Bank continue its commitment to First Nations peoples' crucial role in this growing industry with a range of new projects, supporting Aboriginal and Torres Strait Islander self-determination, agency and land management practices.

Other activities in this Elevate RAP focus on Commonwealth Bank's own core competencies and increasing the financial wellbeing of its Aboriginal and Torres Strait Islander customers through its services. This is apparent in its assessment of its Indigenous Customer Support Program, where it has taken on-board feedback from advocacy groups about the accessibility of its Indigenous Customer Assistance Line. This Elevate RAP sees Commonwealth Bank introduce new measures to increase the efficacy of this Line, including expanding its coverage, hiring a language interpreter and simplifying its identification process for First Nations customers.

Clear in this Elevate RAP and these projects is Commonwealth Bank's unwavering support for long-term, effective initiatives that are having a lasting impact. What sets the institution apart, however, is its ongoing re-evaluation of its contributions using research and feedback to ensure they continue to be effective. This is what sustainable, brave and considered action for reconciliation looks like and speaks volumes about what it is set to achieve through this new RAP.

On behalf of Reconciliation Australia, I commend Commonwealth Bank on this Elevate RAP and look forward to following its ongoing reconciliation journey.

Karen Mundine
Chief Executive Officer
Reconciliation Australia

Our reconciliation vision is to build a brighter future for Aboriginal and Torres Strait Islander colleagues, customers and communities.

At CommBank, our purpose is to build a brighter future for all. This means playing a leadership role in Australia's recovery and transition, and leading in the support we provide to our customers and communities. Through our Reconciliation Action Plan we align our reconciliation vision to our purpose, supporting us to deliver on this commitment for Aboriginal and Torres Strait Islander peoples every day.

To achieve our reconciliation vision, we aim to have demonstrable impact on four key issues:

- Removing barriers to accessing appropriate financial products and services.
- Building community trust in our institution and embedding Indigenous rights in our business.
- Removing barriers to employment within the bank and economic participation for First Nations businesses.
- Understanding the unique nature of financial abuse in the First Nations context and working with community to develop ways to identify and address it.

Supporting us to achieve our reconciliation vision are our values, which guide us in how and with whom we do business:

- **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.

We are also guided by our [Group Code of Conduct](#), which sets out expectations for how we act, solve problems and make decisions. The Code is the ultimate guide for how we do things and it describes the standards of conduct we expect. It connects our purpose, values and key Group policies to help us deliver the right outcomes for all our stakeholders

Who we are.

We are a leading provider of integrated financial services, including retail, premium, business and institutional banking, superannuation, insurance and share-broking products and services. Our head office is located at Tumbalong (Darling Harbour, Sydney) on the Lands of the Gadigal Peoples.

We serve more than 16 million customers globally, and, in line with our commitment to maintaining the largest branch network in Australia, as at 30 June 2022 we operated 807 branches in Australia. We employ more than 49,000 full-time equivalent employees, with 38,483 employees based in Australia. As at September 2021, First Nations representation across our domestic workforce was 0.9 per cent.

This year, we renewed our purpose, building a brighter future for all, to reflect the role we see ourselves playing in the years ahead and to focus on the impact we can make to people's lives. Our purpose reflects our ambition. It inspires and connects us to the Bank's reason for being, while conveying our hope and optimism for the future. Our purpose is also more inclusive, grounded in our heritage as a bank for all.

Our domestic brands include Commonwealth Bank and Bankwest and this RAP includes commitments across both of these businesses.

Our Customer Commitment

We are committed to becoming Australia's most accessible bank by complying with the highest level of conduct codes and making banking easier for customers in vulnerable circumstances as well as customers requiring extra care. The **Customer Advocate** is here to be a voice for our customers and the community — to make sure our customers and the community are heard, understood and treated fairly throughout the Commonwealth Bank. The Customer Advocate has a focus on identifying opportunities to improve the Bank's products, services, systems and processes and helping the Bank make better decisions through the use of data, insights and different perspectives.

Everyone can experience **financial hardship** at some time. This may be related to illness, unemployment or reduced income, a pandemic, natural disaster or relationship breakdown. But getting support is important. Our Financial Assistance Solutions team can work with customers if they won't be able to meet their repayments, or if they have fallen behind. Just as there are a range of situations that can cause financial hardship, we also offer a range of financial support options. The [Financial Support Hub](#) outlines support specific to our customer's individual circumstances.

Our RAP governance.

Acknowledging the importance of taking a rights-based approach to our reconciliation program and having Aboriginal and Torres Strait Islander voices and perspectives inform our approach and decisions, our Indigenous Advisory Council (IAC) was formed in 2014. The IAC consists of senior CommBank leaders, a First Nations CommBank employee representative, and external Aboriginal and Torres Strait Islander leaders to guide the development and implementation of our reconciliation program.

Our IAC consists of six Aboriginal and Torres Strait Islander members:

Chair: Sean Gordon Wangkumarra/Barkindji

Employee representative: Mitchell Heritage Kuku-Yalanji/Goorimpul

Dr Bronwyn Bancroft Bundjalung

Gail Mabo Meriam

Mick Gooda Gangulu

Mayrah Sonter Wiradjuri.

In addition, CommBank senior leaders also sit on the IAC, representing divisions that have responsibilities under the RAP:

- David Castle, Regional General Manager Customer Service Network (Retail Banking Services)
- Robert Cory, Head of External Communications and Sustainability, Bankwest (Bankwest)
- Natasha Greenwood, General Manager WA/SA/NT Regional and Agribusiness Banking (Business Bank)
- Sian Lewis, Group Executive Human Resources (Human Resources)
- Sally Reid, Executive General Manager, Global Client Solutions (Institutional Banking and Markets)
- Euan Robertson, General Manager Government Industry and Sustainability (Marketing and Corporate Affairs)
- Jennifer Saiz, Executive General Manager Group Corporate Services (Financial Services)
- Angela MacMillan, Group Customer Advocate (Office of the Deputy CEO).

In 2018, we appointed Sean Gordon as Chair of the IAC.

In addition, Sean sits on the CEO Advisory Council to ensure First Nations views are central to the group's discussions.

Sian Lewis is the executive sponsor for Yana Budjari and sits on the Bank's Executive Leadership Team (ELT), reporting to the CEO. To strengthen the voice of our Indigenous Employee Network (IEN), in 2022, we appointed a First Nations employee representative to the IAC. In this role, Mitchell Heritage will be a voice for First Nations employees advocating their aspirations, needs and ideas.

We recognise and respect the important role our IAC plays in ensuring we appropriately and publicly support issues that affect First Nations peoples. Through the support of our IAC we have developed a better understanding of CommBank's role in reconciliation, including when it is appropriate to take a leading role on issues and when it is more appropriate to support other voices in their advocacy. Through the Voice to Parliament, we have aimed to support First Nations leaders and organisations to drive the national conversation and negotiations with governments, such as supporting Uphold and Recognise in their important work to secure bi-partisan support. As the national conversation now moves into a new domain, we will be guided by the IAC on how we use our channels to raise public awareness in the lead up to the referendum.

Implementing our reconciliation program.

Indigenous Leadership Team

In line with our commitment to self-determination and taking a rights-based approach to our reconciliation program, it is critical that Aboriginal and Torres Strait Islander voices and perspectives inform our approaches and decisions. To support us in achieving this, the Indigenous Leadership Team (ILT) was launched in 2022.

The ILT is underpinned by strong cultural concepts of leadership and has a responsibility to amplify the strengths of Aboriginal and Torres Strait Islander ways of knowing and being. The purpose of which is to support interactions across CommBank in Indigenous-focused business and projects. The ILT consists of a diverse group of Aboriginal and Torres Strait Islander employees who are in leadership roles and/or are supporting reconciliation priorities across the Group, as well as elected members of the Indigenous Employee Network (IEN). Current members of the ILT are:

Mitchell Heritage, Kuku-Yalanji/ Goorimpul

Senior Product Owner – Chapter Lead, Indigenous employee representative on IAC

Lucy Brereton, Worimi

Senior Manager, Indigenous Engagement

Bianca Broadhurst

Senior Manager, Inclusion and Diversity

Clark Donovan, Gumbaynggirr / Gunditjmara

Associate Director, Indigenous Carbon

Ray French, Dunghutti / Gamilaroi

Senior Advisor, Indigenous Affairs

Simone Kenmore, Yankunytjatjara

Executive Manager, Indigenous Business Banking

Kyle Leong, Koko-Bera

Senior Manager, RBS Indigenous Engagement

Kat McGuire, Yuin

Manager, Indigenous Careers Engagement

Melissa Riley, Wiradjuri

Manager, Indigenous Engagement Technology and Operations

Brooke Scott, Gunghanji / Kuku-Yalanji

Manager, Indigenous Affairs

RAP Working Group

To implement the RAP, we have specialists embedded into key business and support units to drive our reconciliation outcomes and support the business in the effective delivery of reconciliation initiatives. Our specialists come together as the RAP Working Group to share strategies, lessons learned and next steps.

Indigenous Affairs Brooke Scott, Gunghanji / Kuku-Yalanji Manager, Indigenous Affairs Ray French, Dunghutti / Gamilaroi Senior Advisor, Indigenous Affairs reconciliationactionplan@cba.com.au	The Indigenous Affairs team coordinates the Bank-wide Reconciliation Action Plan and advises the business on Indigenous affairs matters. In order to improve the cultural safety of our workplaces for First Nations colleagues, customers and community, the team also supports improving the cultural capability of the organisation.
Indigenous Careers Kat McGuire, Yuin Indigenous Careers Engagement Manager Indigenousprograms@cba.com.au	The Indigenous Careers team works to develop strategies to increase talent attraction and representation across the business, working with business units and support units to develop direct hire strategies and tailored employment programs, including the RBS traineeship program, Technology and Operations Indigenous Academy, Risk Management traineeship program and the CareerTrackers internship program.
Inclusion and Diversity Bianca Broadhurst Senior Manager Inclusion and Diversity	Our Inclusion and Diversity team develop and facilitate the implementation of the Group's Inclusion and Diversity Strategy, including our Respect Lives Here initiative, which helps us build a shared understanding of respectful and disrespectful behaviours, the impact they have and the practical actions we can take to create a workplace that is inclusive and safe.
Technology and Operations Indigenous Academy Susan Geoghegan Senior Program Manager Indigenous Program, Technology and Operations Melissa Riley, Wiradjuri Manager Indigenous Engagement, Technology and Operations Indigenousprograms@cba.com.au	The Technology and Operations (IT and Ops) Indigenous Academy is a collaboration between Technology and the Chief Operations Office, who work with relevant stakeholders to innovate pathways for First Nation peoples into meaningful IT and Ops Careers at CommBank, including at Managerial Level.
Supplier Diversity Peter Critchley Manager, Supplier Diversity responsiblesourcing@cba.com.au	The Supplier Diversity team supports the business to increase spend with First Nations businesses by working with the buying community to raise awareness of aligned businesses and providing advice on purchasing products and services from First Nations businesses. The team also leverages our Group-level spend to direct procurement opportunities to First Nations businesses, for example through purchasing furniture from First Nations businesses during branch fit-outs to sourcing carbon credits with co-benefits for Indigenous communities.
Indigenous Customer Support Program Sarah Dunworth Senior Manager, Group Customer Advocacy and Vulnerability CustomerAdvocate@cba.com.au	Group Customer Advocacy and Vulnerability lead our work on the Indigenous Customer Support Program, a program of work aimed at improving the accessibility of retail and business banking services for all First Nations customers. Through the program, we aim for our products and services to be culturally informed and aligned to First Nations financial wellbeing; and for our communication to be respectful and appropriate of the ways in which First Nations customers seek out information. Group Customer Advocacy and Vulnerability is also pivotal in the delivery of our Next Chapter program through the dedicated customer support offered by the Community Wellbeing team.
Retail Bank Indigenous Engagement Kyle Leong, Koko-Bera Senior Manager, RBS Indigenous Engagement Manager Indigenousbankingservices@cba.com.au	CommBank continually seeks to be known as the culturally safe bank of choice and leverages its influence to drive change, aiming to create spaces that are inviting for Aboriginal and Torres Strait Islander customers. The Retail Bank seeks to provide products and services that meet the needs of First Nations customers, leading to further economic empowerment and self-determination through wealth generation. Our dedicated Indigenous Customers Assistance Line (ICAL) provides extra care to customers who are at risk of financial exclusion and vulnerability due to their isolation.
Indigenous Business Banking Simone Kenmore, Yankunytjatjara Executive Manager, Indigenous Business Banking Clark Donovan, Gumbaynggirr / Gunditjmara Associate Director, Indigenous Carbon Indigenousbusinessbanking@cba.com.au	The vision for Indigenous Business Banking at CommBank is to support a thriving First Nations business sector, building intergenerational wealth and economic independence for First Nations communities. Indigenous Business Banking leads the development of tailored, culturally-appropriate financial products and services for First Nations businesses through a network of culturally accredited Business Banking Specialists. Partnering with Commodities, Trade and Carbon (CTC) in our Institutional Bank, Indigenous Business Banking works with stakeholders across Australia's carbon market to identify opportunities for First Nations carbon projects, and to provide financing and capital to establish and operate carbon projects.
Bankwest Indigenous Engagement Heidi Madden Manager, Sustainability bankwestinthecommunity@bankwest.com.au	Bankwest is a part of the Commonwealth Bank Group and strives to create a brighter future for all by being a simple, friendly, everyday bank for those who own, or aspire to own, their own home. The Bankwest Sustainability team coordinates the financial institution's commitments in the Reconciliation Action Plan, and supports the activities of the Koort Waangkiny Network.

Building stronger local relationships through our Reconciliation Networks

As an employer of over 38,000 people across Australia, we have a significant opportunity to engage our people in reconciliation. Through our Reconciliation Networks, Yana Budjari and Koort Waangkiny, we engage our people from across all business and support units and geographies to get involved in, and support the delivery of our Reconciliation Action Plan, including but not limited to activities during National Reconciliation Week and NAIDOC Week.

Yana Budjari - “Come Together You Mob” in the Dharawal language from the South Coast of NSW is the Commonwealth Bank’s Reconciliation Network for employees. It consists of two streams:

- **Reconciliation Champions:** All Commonwealth Bank employees are invited to join Yana Budjari and become a Reconciliation Champion. Yana Budjari members seek to drive reconciliation engagement within their respective regions, build strong and respectful local and regional relationships, and support community initiatives where possible. Each region has Co-State Leads who reside within the relevant geographical area to support regional and local engagement and act as a contact for Reconciliation Champions in their region. The Co-State Leads represent their respective regions on the national committee, which is led by our Yana Budjari Co-Chairs, one who identifies as First Nations and one who is non-Indigenous; and
- **Indigenous Employee Network:** All First Nations employees are welcome to join the Indigenous Employee Network (IEN). The IEN is a safe space to connect with First Nations colleagues and discuss topics that may relate to them, their families and communities. The IEN meets fortnightly for a Yarning Circle and also connects via a dedicated communication platform. Yarning Circles are also an opportunity to connect with guest speakers to yarn about issues of local and national importance and participate in development sessions.

Koort Waangkiny - “Heart Stories” is open to all Bankwest employees. The network aims to foster an inclusive workplace for Aboriginal and Torres Strait Islander colleagues at Bankwest. The network is also focused on building awareness and understanding of Aboriginal and Torres Strait Islander culture and history.

Indigenous rights

In our FY20–FY22 RAP, we committed to aligning our reconciliation program to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and using the key principles to inform our business decisions and program activities. Meeting our responsibility to respect human rights requires us to understand our relationship to Indigenous rights risks or impacts. The United Nations Guiding Principles on Business and Human Rights (UNGPs) guides our understanding of how we may ‘cause’, ‘contribute to’, or be ‘directly linked’ human rights risks and impacts. For the purposes of the the RAP, we use the UNGPs to assist us in reporting on how we identify and manage risks across our business as an employer, a provider of banking products and services, and a procurer of goods and services.



Type of potential involvement (using the UNGP framework as a reference for the RAP)

	Cause	Contribute to	Directly linked
Definition of involvement	‘Causes’ human rights harm through our own acts or omissions.	‘Contributes to’ human rights harm through our own acts or omissions.	‘Directly linked’ to human rights harm through our operations, products, or services by a business relationship.
Management principle	Cease or prevent the harm and provide for or cooperate in legitimate remediation processes.	Cease or prevent contribution and use leverage to mitigate any remaining harm and provide for or cooperate in legitimate remediation processes.	Seek to use leverage to prevent or mitigate the harm, increase leverage where it is lacking, and it is appropriate to do so, and consider the need to provide remediation.

Through our role as:

An employer	Potentially impacting our people
A provider of banking products and services	Via our employees, clients and customers
A procurer of goods and services	Via our suppliers

The UNDRIP contains 46 articles, including articles aimed at protecting and respecting Indigenous peoples' rights to cultural integrity, education, and political participation, among other areas. The United Nations Global Compact groups these rights as:

Indigenous Rights Type	Coverage of Indigenous peoples rights
Foundation principles	Equality and freedom from discrimination (Art. 1 and 2) Self-determination, self-governance and nationality (Art. 3, 4, 5, 6 and 23)
Life, liberty and cultural integrity	Life, liberty and security (Art. 7) Identity and group membership (Art. 9 and 33) Removal and relocation (Art. 10)
Culture, language and spirituality	Maintenance and dignity of culture, language and spirituality (Art. 8, 11, 12, 13 and 15)
Education, information and employment	Education (Art. 14) Media (Art. 16) Labour rights and employment (Art. 17)
Participatory development, economic and social rights	Participation in decision making (Art. 18 and 19) Development, political, economic and social activities (Art. 20 and 21) Indigenous women, elders, youth, children and persons with disabilities (Art. 22 and 44) Health (Art. 24)
Land and natural resources	Land and natural resources – spiritual basis (Art. 25) Land and natural resources – ownership, use, development, exploitation and conservation (Art. 26, 27, 28, 29 and 32) Military activities on Indigenous peoples lands (Art. 30) Cultural heritage and traditional knowledge (Art. 31)
Identity, institutions and relations	Development and maintenance of institutional structures and customs (Art. 34 and 35) International relations: borders and treaties (Art. 36 and 37)
Implementing the UN Declaration	States' obligation to implement the UN Declaration (Art 38) Adjudication of conflicts and access to assistance (Art. 39 and 40) Promotion of the Rights (Art. 41 and 42) Interpretative Guidance (Art. 45 and 46)

Respect for the rights of Indigenous peoples is a key commitment in our Group Environment and Social Policy, and supporting [Environment and Social Framework](#). Our Environment and Social Policy provides a reference point for our people and stakeholders on the minimum standards we seek to abide by, and some of the key targets we seek to achieve.

Our Environment and Social Policy supports us to respect the rights of Indigenous peoples in the following ways:

- We acknowledge the Traditional Owners of the lands across Australia;
- We are committed to recognising and managing the impacts of our operations on Aboriginal and Torres Strait Islander peoples and communities;
- We support free, prior and informed consent for applicable project finance, as outlined by the Equator Principles, for Indigenous communities impacted by project decisions or actions that could affect their land, territory, and natural resources, and
- We promote the rights of Indigenous peoples through the commitments outlined in our Reconciliation Action Plan (RAP), including by creating employment opportunities for Aboriginal and Torres Strait Islander peoples; opportunities for Indigenous-owned suppliers through targeted initiatives; and developing our peoples' cultural capability.

Through our Environment and Social Policy, we expect our Clients, Suppliers and other business partners to identify, manage, monitor, and redress any adverse impacts on human rights where their business is involved. To support this outcome, we perform Environmental, Social and Governance (ESG) risk assessments on institutional corporate lending and business customers with proposed corporate lending greater than \$1 million. These assessments are performed in one of two ways:

- The Corporate and Institutional Pathway (business corporate lending greater than \$30 million and institutional corporate lending).
- The Commercial Pathway (business corporate lending between \$1 million and \$30 million).

The ESG risk assessment tool is supported by a dataset of initial risk ratings across key focus areas, including climate and energy; climate physical risk; water; pollution; biodiversity; human rights; labour rights and modern slavery; workplace health and safety; and anti-corruption and governance. The ESG risk assessment tool is integrated into the Bank's corporate loan pricing system to embed it as part of the corporate lending decision process.

About our FY23–FY25 Reconciliation Action Plan

As Australia's largest bank, we have a strong commitment to reconciliation with First Nations peoples. We recognise there are complex barriers preventing First Nations peoples from full and equal participation in a range of life opportunities and through our RAP we seek to play our part in supporting all dimensions of reconciliation. To achieve societal change and contribute to reconciliation, our FY23—25 RAP focuses on five inter-related pillars.

Pillar 1: Foundation: Indigenous Rights and Engagement

Respecting Indigenous rights, engaging effectively, building cultural capability and supporting place-based solutions.

Pillar 2: Foundation: Economic Empowerment and Prosperity

Driving employment opportunities and career advancement across the bank; and supporting a strong and prosperous First Nations business sector.

Pillar 3: Transformation: Domestic Violence and Financial Abuse

Understanding, identifying and supporting culturally informed responses to domestic violence and financial abuse impacting First Nations peoples.

Pillar 4: Transformation: Indigenous Customer Support Program

Improving awareness of, access to and inclusion in our banking products and services.

Pillar 5: Transformation: Indigenous Carbon Economies

Supporting First Nations land-owners to establish, and scale new carbon projects.

Measurement and evaluation of outcomes

In developing the FY23–FY25 RAP, we worked with Social Ventures Australia to develop program logics that articulate the outcomes we seek from our reconciliation program. Through this work, we identified a number of integrated RAP outcomes, as well as outcomes specific to each of the pillars of our plan.

To understand how we are progressing in achieving impact, we will continue to work with Social Ventures Australia to finalise a Measurement and Evaluation framework for our RAP. Through the development of the framework, we will seek to work with stakeholders to understand which outcomes are already being measured, through the Workplace RAP Barometer and other surveys and measures, before determining any additional key outcomes that should be measured in order to understand where we are, or are not, contributing to our social impact. With this information, priority outcomes will be selected, which will form the basis of our data collection, measurement, evaluation and reporting.

This work is underway and due for completion by the end of the 2022 calendar year.

Integrated RAP outcomes: First Nations individuals, businesses and communities



Integrated RAP outcomes: Organisational and employee outcomes at CommBank

Activities

CommBank develops and grows First Nations workforce and leadership

CommBank and employees build cultural capability and embed this in practice

CommBank can better understand and address barriers to participation

CommBank has stronger relationships with community and the sector

Outcomes from 2023—25 RAP period and beyond

More First Nations people are aware of employment opportunities at CommBank

Candidates feel culturally safe across the recruitment lifecycle

More First Nations peoples are employed at CommBank

Feel their voices are heard by relevant teams and senior leaders

Employee are supported to progress in their roles

Employees stay at CommBank (retention)

Employees feel their work is meaningful and are proud to be making a difference (engagement)

Increased likelihood of financial independence and prosperity

Personal change

Understand experiences of First Nations peoples

Understand cultural practices, Aboriginal Terms of Reference, logics and knowledge systems

There are more First Nations voices informing First Nations solutions

Increased use of culturally safe approaches to working with and engaging First Nations peoples, employees and communities

Become an advocate within the bank for First Nations peoples

Feel a deep sense of pride for First Nations cultures as the oldest surviving cultures in the world

Organisational change

Grow a network of RAP champions and advocates

Organisation embeds culturally appropriate policies and protocols (e.g. supporting employees during Sorry Business)

Achievement of RAP objectives (e.g. employment, procurement)

Greater engagement with First Nations peoples on issues around access and participation

Leverage insights to improve policies and processes impacting First Nations peoples

Data and insights provide CommBank with deeper understanding of First Nations issues

Leverage insights to support senior leaders to make informed decisions about issues impacting First Nations peoples and communities

Voices of First Nations peoples support better outcomes

CommBank has strong partnerships with a network of organisations that can deliver culturally responsive support

CommBank, partners and community learn from each other, collaborate on better solutions and improve services

CommBank, partners and community strengthen advocacy voice

CommBank positively influences others in the sector

First Nations peoples, employees and communities feel safe in their interactions with CommBank

Develop genuine respectful, two-way relationships with individuals, businesses and community

Trust in and reputation of CommBank is improved with First Nations peoples and communities

Direct CommBank outcomes

Outcomes CommBank seeks to contribute to over time

Reconciliation Action Plan FY23—25

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Our FY23—FY25 Reconciliation Action Plan

Pillar 1: Foundation: Indigenous Rights and Engagement

As the largest bank in Australia, we recognise the importance of leading on Indigenous rights and maintaining strong and respectful relationships with First Nations peoples, built on a foundation of respect and understanding. We recognise that we hold a strong and unique position in Australia where we can work to protect and advance the rights of First Nations peoples, directly through our own activities and programs, and indirectly by leveraging our influence across corporate Australia.

Since aligning our FY20—22 RAP to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), we have sought to take a First Nations-led approach to our reconciliation program. Through our support for Uluru Statement from the Heart and our partnership with Uphold and Recognise, we understand that supporting the concept of the Voice is not a “moment in time” event. It requires an ongoing commitment to institutional change, a process we have begun internally through the support of our Indigenous Advisory Council and First Nations employees.

Our work to embed Indigenous rights has matured over the last three years and is now a key foundation to our reconciliation program and our Environment and Social program more broadly. As well as building our own capability, we will share insights and lessons with other groups committed to reconciliation and the rights of Indigenous peoples. This includes through our participation in key networks such as the UN Global Compact and

Global Compact Network Australia and domestic and international forums focused on the promotion, protection and realisation of Indigenous peoples’ rights and ethical corporate behaviour.

This pillar will advance reconciliation by:

- **Unity:** Increasing the cultural capability of the organisation and valuing First Nations cultures and heritage as an integral part of our national identity.
- **Race Relations:** Raising awareness of First Nations peoples’ rights and strengthening consultation with Aboriginal and Torres Strait Islander peoples as the foundation to developing stronger relationships.
- **Equality and Equity:** Recognising and upholding the human rights of First Nations peoples, including creating appropriate spaces for Aboriginal and Torres Strait Islander peoples to participate in decisions that affect them and their communities.
- **Institutional Integrity:** Recognising that all businesses have a responsibility to avoid causing or contributing to adverse human rights impacts through their business activities, and addressing any impacts when they do occur ensuring this responsibility extends to Indigenous human rights.
- **Historical Acceptance:** Understanding the role the financial services sector played in Indigenous economic disadvantage so we are able to acknowledge the past and move forward towards reconciliation as a unified nation.

Supporting the organisation on its journey of cultural capability

In our FY20–22 RAP, we set a cultural capability goal of 70 per cent participation in cultural learning across our domestic workforce over the period of our RAP¹. Over the last three years, we have increased the unique completion rate of cultural capability from 8.4 per cent during FY20, to over 62 per cent during FY22. We in part achieved this outcome by working with BlackCard to transition their training to online sessions during COVID. The uptake of the virtual training was so encouraging, we have now worked with BlackCard to create an introductory virtual 3 hour program (BlackCard Level 1) for all our people to complete, followed by a face-to-face full day training session (BlackCard Level 2) targeting key roles across the Bank. We also invested in industry leading online learning with Arrilla focused on improving the way we provide banking services to First Nations customers. The learning seeks to improve the way we provide banking services to First Nations customers by raising awareness of how conscious and unconscious biases, assumptions, stereotypes and prejudices influence our actions and interactions. This learning was completed and launched in the second half of FY22 and is mandatory for ~13,000 customer-facing roles in the retail and business banks and is recommended for all other employees.

While we are unable to have the 3-year completion rate assured (given historical data cannot be assured), based on the FY22 number of Australian employees, of Australian employees, 75 per cent of our people completed at least one form of cultural capability training over the three years RAP reporting period. As we look towards our FY23–25 RAP, we are committed to continuing to build our cultural capability through a range of education, exposure and experience opportunities.

1 Through our limited assurance process, it was agreed that two cultural e-learning programs and BlackCard would be included in the target, given we had robust data collection processes for these programs.

Activities



Outcomes from 2023—25 RAP period and beyond

Outcomes for First Nations individuals, families and communities

Are provided with culturally responsive tools and resources that support them to understand their rights	Increased comfort that financing applications that could impact on the rights of Indigenous peoples are being escalated for further review	Contribute to meaningful solutions that benefit community	Are more willing to engage positively with the bank	Greater empowerment and self-determination
Are actively engaged on issues that affect them (from problem definition to designing, implementing and evaluating solutions)	Engagement supports First Nations agency and is based on the aspirations and priorities of community	Feel their input is valued	Develop a greater sense of trust in CommBank	First Nations rights are respected and protected
			Build stronger relationships with CommBank	Also see access and inclusion outcomes on p.8

Outcomes for CommBank

Increased awareness of First Nations rights and how they apply within our business operations	Appreciate issues relating to the historical, cultural and social complexity of First Nations contexts	Deliver improved service experience	Build positive two-way relationships, based on trust and respect with First Nations customers and communities	Engagement with First Nations communities takes place within a framework of Aboriginal self determination	Respect for First Nations rights is embedded into CommBank's relationships, business policies, processes, business decisions and program activities relevant to First Nations communities
Build cultural capability (Also see capability outcomes on p.9)					
First Nations employees / banking champions contribute to CommBank's understanding of First Nations rights and customer needs		Identify and act on new opportunities to create positive outcomes for First Nations customers and communities		Genuine efforts are made to share power, including agreed conflict resolution processes and transparency about decision making	
CommBank grows its knowledge of best-practice engagement (incl. place-based engagement)		Use insights to improve design and delivery of training and deliver service uplift across the retail bank			
Have to tools to assess outcomes of cultural capability and service experience training					

Focus areas	Activities	Timeframe	Responsibility
Acknowledge and embed considerations of Indigenous rights across our business operations	1. Implement and communicate a cultural protocol document acknowledging the Traditional Owners of the lands across Australia and providing resources and advice to teams on Welcome to Country, Acknowledgement of Country and integrating First Nations culture into place/space. The document should outline events and meetings where teams should invite a local Traditional Owner to provide a Welcome to Country or where other cultural protocols should be observed to appropriately acknowledge Country.	1 June 2025	1—4 Indigenous Affairs
	2. Recognise and manage the impacts of our operations on Aboriginal and Torres Strait Islander peoples and communities, including by supporting free, prior and informed consent for applicable project finance as outlined by the Equator Principles for Indigenous communities impacted by project decisions or actions that could affect their land, territory, and natural resources.	2 June 2024	
	3. Promote the application of a First Nations-led approach by finalising and embedding Indigenous engagement principles, including encouraging teams to seek advice early to understand how products, services and initiatives can support the economic, political and social aspirations of First Nations peoples. Work with our Indigenous Advisory Council and Indigenous Leadership Team to review and improve our principles each year.	3 June 2023	
	4. Present a proposal to the Indigenous Advisory Council on our approach to guiding the Bank through a process of understanding our own history in Indigenous affairs and how this has impacted on our relationships with First Nations peoples; using the insights from this process to re-set our relationships with First Nations peoples where required.	4 June 2025	
Increase understanding, value and recognition of Aboriginal and Torres Strait Islander cultures, histories, knowledge and rights through cultural learning	5. Deliver the Indigenous Cultural Development Program across CommBank and Bankwest, providing our people with education, experience and exposure opportunities including BlackCard, Jawun, on-Country experiences, and online learning including the 'Servicing First Nations Customers with Sensitivity, Respect and Compassion' e-learning. Our goal is to have at least 70 per cent of employees completing cultural learning over the RAP reporting period, with at least 600 people completing face to face BlackCard and 9000 people completing online learning each year (equating to a 25 per cent completion rate annually).	5 June 2023	5—7 Indigenous Affairs
	6. Create opportunities for our people, customers and community to learn directly from First Nations peoples on their achievements, histories, cultures and affairs across the year, and on days of celebration, including through our annual sponsorship of NAIDOC Week. We will provide a national calendar of community activities being held during NAIDOC Week for our people to attend and will encourage Yana Budjari members to attend at least 20 events organised by local community organisations.	6 July annually	
	7. Provide opportunities for at least 20 senior leaders to connect with community leaders to share experiences and learn from each other, including through Garma, Jawun Executive Visit, Jawun Stories of Female Leadership and the KARI Leadership Program.	7 June 2023	

Focus areas	Activities	Timeframe	Responsibility
	8. Raise the profile of leader engagement in cultural learning by encouraging Bankwest senior leaders to complete cultural development training and participate in cultural events and activities. The Bankwest Leader Community channel will be used to promote cultural learning and engagement four times per year. Senior leaders will be encouraged to reflect on their learnings and experiences, and share them with the organisation through Hub or Yammer posts three times per year.	8 June 2025	8—10 Bankwest Sustainability
	9. Provide Bankwest reconciliation champions with the opportunity to participate in one local cultural immersion experience each year.	9 June 2025	
	10. Explore the appointment of an Elder in Residence, with the aim of providing Bankwest with a more permanent link to First Nations communities and cultures. The process will include broad internal and external stakeholder consultation, following appropriate cultural and community protocols, with a clearly defined role purpose, responsibilities and duration.	10 June 2025	
	11. Develop the mentoring skills of reconciliation champions at Bankwest by providing training in effective mentoring to at least five members of the Koort Waangkiny network and/or the RAP working group. The aim of the initiative is to improve the support provided to First Nations employees.	11 June 2023	11 Bankwest Sustainability
Promote reconciliation across the organisation and create opportunities for our people to build respectful relationships with their local communities	12. Through the Yana Budjari National Committee, review and refresh the Yana Budjari employee engagement strategy annually to raise awareness of reconciliation and engagement opportunities across our workforce.	12 June 2023	12—14 Indigenous Affairs
	13. Increase engagement at a local level, supporting Yana Budjari to coordinate at least 10 reconciliation activities across the organisation for National Reconciliation Week each year. Seek to provide a range of opportunities for our people and senior leaders to participate in. In supporting Yana Budjari to lead on NRW, circulate Reconciliation Australia's NRW resources and reconciliation materials and support Yana Budjari State Co-Leads to register all our NRW events on Reconciliation Australia's NRW website.	13—14 27 May—3 June annually	
	14. Hold an organisation-wide Reconciliation Dialogue during NRW, inviting First Nations employees and external representatives to share their views and insights on important reconciliation issues.		
Deepen our community engagement to support First Nations solutions designed by the community, for the community	15. Consult with Aboriginal and Torres Strait Islander peoples annually to understand how we can continue to strengthen relationships in order to meet the needs of First Nations stakeholders. Support this process by finalising and implementing grievance mechanisms through which First Nations peoples can raise concerns directly with the Bank. Share feedback with IAC, the RAP Working Group and relevant teams as appropriate.	15 June 2023	15—16 Indigenous Affairs
	16. Provide guidance to teams through the development of an Indigenous engagement toolkit, making the toolkit available via CommBank's and Bankwest's Reconciliation Knowledge Hub and sharing lessons from recent community engagement initiatives to build best-practice approaches.	16 June 2024	
	17. Invite at least two representatives from the First Nations community to share their perspectives and input into Bankwest customer matters, through the quarterly Community Leaders Forum.	17 June 2025	17 Bankwest Sustainability
	18. Invite Indigenous technologists to present at IT and Ops Events, hosted by CommBank Technology & Operations to support teams to develop trusted and respectful relationships with local Aboriginal and Torres Strait Islander providers and communities.	18 May and November Annually	18 HR Technology and Operations

Pillar 2: Foundation: Economic Empowerment and Prosperity

Though our economic empowerment and prosperity pillar, we continue our commitment to leading in achieving parity for First Nations peoples across our workforce and supply chain. These are ambitious goals however, we believe committing to equal economic participation for First Nations peoples within our business must be part of the foundations to our reconciliation program.

Economic participation, whether through equal access to career opportunities with an employer or through setting up a business, is essential to improving economic security and financial wellbeing. Positive financial wellbeing, including being on top of every day expenses, preparing to bounce back from a rainy day without needing to borrow and being on track to achieve future goals, provides the financial freedoms to make choices that allow for the full enjoyment of life. This underpins our commitment to helping to build a brighter future for all, including First Nations peoples.

Attracting First Nations people to the Bank

In 2016, we set an Indigenous employment parity target of 3 per cent by December 2026. At the time, representation of First Nations peoples across our domestic workforce was ~0.2 per cent.

The enablers and barriers to Indigenous Australians' participation in employment are numerous and intertwined with social, cultural, geographic and economic factors. In early 2022, the Indigenous Careers team conducted a review seeking to understand how we might better attract First Nations peoples to the Bank, while also seeking to understand what, if any, other factors were contributing to slower than expected progress against our 3 per cent target. This included discussions with Indigenous Partner organisations, CommBank leaders and Indigenous Program Managers and listening sessions conducted with First Nations employees. This review provided us with extensive and valuable lessons, including that there are opportunities to better amplify our talent attraction messaging as well as expanding the channels we use to engage candidates. We also found better ways to align workforce plans and demand forecasts to diverse talent supply and identified that across the bank there is inconsistency in First Nations employee experiences.

These insights have supported Indigenous Careers to develop a refreshed approach to our Indigenous Careers Attraction Strategy. The strategy builds on our improved understanding of effective approaches to Indigenous careers development, internal engagement, community partnerships and recruitment marketing. While the new Indigenous Careers Attraction Strategy aims to increase the number of First Nations people we employ, we are tracking behind our plans

to achieve 3 per cent target by 2026. We remain committed to achieving Indigenous employment parity, an aspirational goal that we hope to achieve. Over the next three years, we will be focusing on improved data collection and retention strategies to help us progress towards this goal.

Economic empowerment through supplier diversity

In 2019, we signed up to the Business Council of Australia's Raising the Bar program, setting a standard target of 3 per cent 'contestable spend' with First Nations-owned businesses by 2024. Since adopting the target, we have made steady progress in increasing our spend with First Nations business, with spend increasing from \$2.9m in FY19 to more than \$7m in FY22.

During this time, the 'contestable spend' reference point has proven difficult to define and measure given there is complexity in determining what constitutes 'contestable spend'. Determining contestability involves a considerable amount of review and assessment, firstly to determine our major spend categories, and then assessing, with input from Supply Nation, if there are First Nations businesses who could reasonably compete for that spend.

Given the intention of the commitment is to ensure First Nations businesses have increasing access to opportunities, we will be moving to a simplified target that focuses the organisation on increasing spend with First Nations-owned businesses by 10 per cent year-on-year (with FY22 being the base-line year) and increasing the number of First Nations-owned suppliers we do business with. This will allow us to focus on developing the right relationships and supporting two-way development opportunities to support more First Nations businesses into our supply chain.

This pillar will advance reconciliation by:

- **Race Relations:** By implementing our CommBank People Promise for First Nations employees and embedding First Nations perspectives into Respect Lives Here, we are able to have meaningful impact on race relations.
- **Equality and Equity:** Improving Aboriginal and Torres Strait Islander peoples access to equal opportunity of a meaningful career, whether through employment directly with CommBank or through the establishment and growth of commercial enterprises.
- **Institutional Integrity:** Improving economic participation opportunities by identifying and removing the internal barriers that are preventing First Nations peoples from participating equally in opportunities.

Improving retention outcomes through role modelling our People Promise

As part of our FY23-25 RAP, we will develop an Indigenous Retention Strategy to complement the Indigenous Careers Attraction plan. As part of the retention strategy, we will be leveraging our Respect Lives Here initiative to maintain a workplace where First Nations peoples feel respected, safe and included at work. This is reflected in our CommBank People Promise in how we will bring out the best in each other and it is integral to our values as we can only truly demonstrate care, courage and commitment when we also have a sense of respect and inclusion. Respect means embracing our differences

and celebrating the things we have in common, staying connected to each other and taking extra care in the things we say and do every day.

Respect Lives Here is a prevention initiative designed to help us build a shared understanding of respectful and disrespectful behaviours at work, the impacts they have, and the practical actions our people can take to be active bystanders when they see or hear something that does not feel right. It was informed by our people's lived experiences, and draws on the evidenced-based

work of Our Watch, Griffith University and the University of New South Wales. The initiative addresses the attitudes, behaviours and standards that enable our people to foster a positive team culture and prevent harmful behaviours, such as racism, sexual harassment or marginalisation at work. Through Respect Lives Here, our Inclusion and Diversity team will continue to engage with First Nations people guiding how we build a shared understanding of respectful and disrespectful behaviours, the impact they have and the practical actions we can take.

Activities

Improve pathways to employment across CommBank and Bankwest

Enhance First Nations employee experience and promote positive race relations

Support the growth of the First Nations business sector

Outcomes from 2023—25 RAP period and beyond

Outcomes for First Nations individuals, families and communities

Employment and retention				Also see employment outcomes on p.8
Are aware of employment opportunities at CommBank	Take up internships / traineeships / scholarships	Feel well supported during the recruitment process	Feel the value proposition for working at CommBank is compelling	
Become an employee at CommBank	Have opportunities to progress career at CommBank	Feel safe and included as an employee	Feel supported to balance employment obligations with family and community obligations	Increased capacity to employ more First Nations employees
Businesses				Suppliers grow, expand and adapt, to become prosperous, sustainable businesses
Suppliers improve understanding of tender processes	Suppliers improve their understanding of business fundamentals	Increased rate and quality of tender submissions	Improved understanding of their own organisation	
Increased rate of success at winning tenders		Overall increase in business capability	Increased revenue	

Outcomes for CommBank

More First Nations people are aware of employment opportunities at CommBank	CommBank offers a compelling value proposition to First Nations candidates	More First Nations peoples are employed at CommBank	CommBank realises efficiencies from retention of experienced and engaged First Nations employees
Trainees and interns have a positive experience with CommBank	CommBank has strong partnerships that build CommBank's reach to more First Nations peoples and businesses	CommBank achieves / exceeds its supplier spend targets	Achieves and maintains equal representation in CommBank's workforce
		CBA EVP is enhanced as a result of a more diverse workforce	Suppliers are supported to scale their business
People managers have the skills and confidence to provide culturally safe support to First Nations employees	First Nations employees have a positive and meaningful experience at CommBank and decide to stay (retention)		CommBank creates more opportunities for First Nations suppliers over times
			Greater economic participation among Indigenous people and businesses

Direct CommBank outcomes

Outcomes CommBank seeks to contribute to over time

Focus areas	Activities	Timeframe	Responsibility
Improve pathways to employment across CommBank and Bankwest	19. Deliver the FY23—25 Indigenous Careers Attraction Strategy to increase representation of Aboriginal and Torres Strait Islander peoples across our domestic workforce to 3 per cent by December 2026, by aiming to recruit at least 150 First Nations people per annum.	19 October 2023	19—22 Indigenous Careers
	20. Provide at least 70 School Based Traineeship positions annually (35 trainees in their first year of the program and 35 trainees in their second year at any given time), achieving at least 30 per cent conversion to permanent roles or Full-time Traineeship positions on completion of the traineeships.	20 June annually	
	21. Provide at least 15 Full-time Traineeship positions annually, achieving at least 60 per cent conversion to permanent roles on completion of the traineeships.	21 June annually	
	22. Continue to partner with CareerTrackers to provide at least 25 Indigenous university internship opportunities across CommBank and Bankwest, achieving at least 60 per cent conversion to permanent roles or graduate program positions on graduation from university.	22 June annually	
	23. Optimise participation in the Technology and Operations Indigenous Academy, achieving at least a 60 per cent conversion to permanent roles or graduate program positions on completion of Academy engagement. This will be supported by collaboration with relevant community, IT industry and CommBank representatives to develop innovative pathways for First Nation peoples into meaningful IT and Ops Careers, including at Managerial Level.	23 December annually	23 HR Technology and Operations
	24. Provide at least two traineeships in Group Audit, offering rotations that are identified by trainees so they are accessing learning that is based on their areas of interest and future career goals.	24 June 2023	24 HR Risk Management
	25. Work with the Polly Farmer Foundation (PFF) to support skill development and corporate readiness in Follow the Dream (FTD) students in Years 10—12, donate 15 laptops to the FTD program and explore opportunities to offer employment to First Nations Year 12 leavers.	25 June 2025	25 Bankwest Sustainability
	26. Complete a full end to end review of the candidate experience from application to background checks, identifying opportunities to better support First Nations candidates and embed the Guaranteed Interview Scheme to enable First Nations applicants who apply for roles at CommBank and Bankwest and who have the right skills and experience to automatically progress to the interview stage.	26 June 2025	26—27 Indigenous Careers
	27. Review and expand the recruitment marketing plan for Aboriginal and Torres Strait Islander candidates, with an aim to increase applications.	27 June 2024	

Focus areas	Activities	Timeframe	Responsibility
Enhance First Nations employee experience and promote positive race relations	28. Provide three scholarships annually to Australian Graduate School of Management's Emerging Indigenous Executive Leaders Program and one scholarship for the KARI Leadership Program.	28 June 2023	28 Indigenous Careers
	29. Create regular engagement opportunities to First Nations employees through the Indigenous Employee Network, via the yarning circle program, to ensure we are providing an inclusive and culturally safe environment for First Nations employees.	29 Monthly	29 Indigenous Affairs
	30. Actively seek feedback on employee experiences through listening sessions and share insights to help inform successful recruitment, retention and professional development approaches.	30 June 2023	30—31 Indigenous Careers and Inclusion and Diversity
	31. Design and implement a career coaching initiative for First Nations employees, offering support in finding and securing their next opportunity, including managerial and senior level positions.	31 June 2024	
	32. Develop a First Nations retention strategy for the Group to support us to meet our Indigenous careers goals.	32 June 2024	32 Inclusion and Diversity
	33. Encourage line managers and senior leaders who have recruited First Nations team members through Indigenous recruitment programs to complete cultural capability training ahead of employee commencement.	33 June 2023	33 Indigenous Affairs
Support the growth of the First Nations business sector	34. Execute the Indigenous Procurement Program to increase our supply chain spend with Indigenous-owned businesses by 10 per cent year-on-year from a FY22 actual baseline.	34 June annually	34—38 Supplier Diversity
	35. Embed the First Nations Supplier Spend Working Group, which brings together senior stakeholders from across the organisation to drive improved outcomes for the Indigenous Procurement Program. Through the working group, seek to remove any barriers to our people procuring from First Nations businesses and provide training to relevant employees to increase spend with First Nations businesses.	35 December 2024	
	36. Integrate First Nations procurement considerations into the procurement process for key identified categories, collaborate with suppliers to increase directed spend opportunities available to First Nations suppliers and develop reporting and monitoring mechanisms to better understand directed spend outcomes.	36 June 2023	
	37. Review relevant international standards related to the Rights of Indigenous Peoples and embed within our Supplier Code of Conduct and procurement practices.	37 June 2024	39 Bankwest Sustainability
	38. Collaborate with our partners, including Supply Nation through support for the DRIVE and Jumpstart programs, to offer support to enhance First Nations business' ability to work with large organisations.	38 June 2025	
	39. Increase First Nations supplier spend within Bankwest by initially achieving 70 per cent Koort Waangkiny (Bankwest Reconciliation Network) expenditure with First Nations suppliers.	39 June 2025	

Pillar 3: Transformation: Domestic Violence and Financial Abuse

Domestic and family violence is a pressing and widespread issue which can impact any community in Australia. Around one in four women and one in 13 men have experienced violence by an intimate partner since the age of 15². Domestic and family violence has serious long-term impacts for individuals, families and the community. Preventing and responding to the issue requires coordinated and collective efforts by government, community and non-profit organisations, and the private sector.

Since 2015, we have been committed to supporting initiatives to help people impacted by domestic and family violence. We have taken action to support customers in crisis, champion equality, promote their financial independence and advocate for change. For the past five years, we have been working in partnership with community experts to understand and address financial abuse in the context of domestic and family violence (domestic violence and financial abuse). Financial abuse is a serious form of domestic and family violence, which involves someone using money as a means to gain power or control over their partner. It is a hidden epidemic affecting thousands of people in Australia.

The refreshed Closing the Gap (CTG) program includes seventeen targets across specific priority areas expressed by First Nations peoples to ensure that Aboriginal and Torres Strait Islander people are granted the same life outcomes equal to all Australians. Target thirteen states, 'By 2031, the rate of all forms of family violence and abuse against Aboriginal and Torres Strait Islander women and children is reduced at least by 50 per cent, as progress towards zero'. This highlights the importance of ensuring our Next Chapter program considers the unique needs of First Nations victim-survivors.

Driving systemic change within CommBank

Leveraging our experience in this area, through this transformation pillar, we are committed to working with leading experts and organisations to improve responses to domestic violence and financial abuse where it impacts First Nations peoples. Through our partnership with the University of New South Wales Gendered Violence Research Network (GVRN) we developed a research series exploring current knowledge of domestic violence and financial abuse in Australia, with the second report in the series Understanding Economic and Financial Abuse in First Nations Communities, was launched in 2021. The report found that First Nations communities may face barriers to identifying and responding to financial abuse including language barriers, mistrust of authorities and cultural norms that prevent open discussion of finances. The report has helped to guide our approach to this leadership project.

Through this transformation project, we will work with our community partners and Aboriginal and Torres Strait Islander peoples to take a First Nations-led approach to providing culturally informed support through the Next Chapter program. This will include working with First Nations peoples and services to tailor our responses and enhance our services, supports, access and referral pathways to improve the way we connect with and support First Nations peoples impacted by domestic violence and financial abuse.

Encouraging systemic change within the RAP community and beyond

We recognise that we are in a unique position to connect with customers and the broader community to encourage change. We will continue to share our insights with the broader community through our Financial Abuse Resource Centre. We will look for appropriate ways to ensure the voices of First Nations victim-survivors are heard, as we have recently done through our "There's no place like home" podcast series in partnership with Future Women. This will include providing a platform for First Nations voices to be heard on this issue during important public awareness and advocacy campaigns, such as during the 16 Days of Activism Campaign; as well as seeking appropriate opportunities at industry, business and community events to raise awareness of ways we can collectively support First Nations-led and informed approaches.

This pillar will advance reconciliation by:

- **Equality and Equity:** Increasing our understanding of the unique responses required by First Nations peoples seeking support from the CommBank Next Chapter program, improving cultural safety within our service and ensuring the program is informed by First Nations peoples who have lived experience of domestic violence and financial abuse.
- **Institutional Integrity:** Improving our responses to domestic violence and financial abuse and removing any internal barriers that are preventing First Nations peoples from accessing our support services.

2 Australian Bureau of Statistics (2 January 2020), 4906.0 Personal Safety Survey 2016.

Activities



Outcomes from 2023—25 RAP period and beyond

Outcomes for First Nations individuals, families and communities

Services and supports are communicated through accessible channels in an easy to understand and culturally safe manner	Aware of services available through CommBank's Community Wellbeing team and the Financial Independence Hub	Those without other funding options can access flexible and affordable credit to support financial recovery and independence	Are more likely to engage with support services
Feel safe to raise issues with CommBank's	Feels connected with who they speak to (and ideally speak with a First Nations person)	Feel the service is understanding of them and considers their needs	Have tools and supports to take steps towards financial recovery
Are provided with referrals to appropriate, culturally safe and trusted services	Feel services and support are streamlined, consistent and integrated	Less time, effort, safety risk and stress in accessing services	Talk about CommBank's services with others who may need it
			Increased likelihood of long-term recovery and independence

Outcomes for CommBank

Employment and retention

Access culturally informed training about domestic violence and financial abuse in First Nations context	Access CommBank's cultural capability training (Black Card)	Increased understanding about drivers of financial abuse in First Nations contexts	Build cultural capability
Know where to refer customers to access culturally informed support	Have tools, resources and processes that support employees to identify the issue	Feel equipped to have culturally safe conversations with customers about supports available	Deliver culturally safe services for customers in financial crisis / recovering from crisis

Org. outcomes

Deeper understanding of financial abuse in First Nations contexts	Apply learnings about 'what works' to improve CommBank's Next Chapter Program	Share and promote learnings about 'what works' with the sector to influence better practice	CommBank is seen as a leader in responding to First Nations issues
CommBank has strong partnerships with a network of organisations that can deliver culturally responsive support	CommBank, partners and community learn from each other, collaborate on better solutions and improve services	CommBank, partners and community strengthen advocacy voice	

Direct CommBank outcomes

Outcomes CommBank seeks to contribute to over time

Focus areas	Activities	Timeframe	Responsibility
Enhance CommBank's services, supports, access and referral pathways	40. Engage with First Nations customers who are experiencing financial abuse to understand their experiences and tailor support accordingly. We will engage with customers when they contact us through Community Wellbeing and through the Aboriginal and Torres Strait Islander Community of Practice.	40 June 2024	40—45 Group Customer Advocacy and Vulnerability
	41. Provide BlackCard Training to 100 per cent of all Community Wellbeing team members.	41 June 2025	
	42. Work with the Indigenous Careers team to increase representation of First Nations peoples within the Community Wellbeing team to 3 per cent by 2026.	42 June 2024	
	43. Identify First Nations crisis and wellbeing support organisations to form referral partnerships with, so First Nations customers who are seeking further support are able to be referred to culturally informed services.	43 June 2024	
	44. Seek guidance from the Aboriginal and Torres Strait Islander Community of Practice on ways to continually improve the service we provide to Aboriginal and Torres Strait Islander customers.	44 June 2025	
	45. Develop a tailored approach to raise awareness of the Community Wellbeing team with First Nations customers including attending community days/ expos to raise awareness of the service and to speak directly with customers about the support on offer.	45 June 2024	
Enhance the cultural safety and accessibility of CommBank Next Chapter services and supports	46. Increase awareness and advocacy of CommBank's Next Chapter program amongst Aboriginal and Torres Strait Islander customers and community members, including by attending relevant conferences, events and gatherings to build relationships and connection with members of the community and to increase awareness about the services available.	46 June 2023	46—50 Community Investment
	47. CommBank and the Financial Independence Hub (FIH – in partnership with Good Shepherd Australia and New Zealand) to work collaboratively with First Nations peoples to review resources for cultural appropriateness and safety and distribute through identified First Nations channels (i.e. Community organisations, First Nations media).	47 June 2025	
	48. CommBank and FIH to work in partnership to share resources and approaches to further strengthen employment opportunities for First Nations peoples and continue to increase cultural safety for both employees and participants, including providing BlackCard training to all FIH employees.	48 June 2025	
	49. Together with Good Shepherd, identify First Nations partners for FIH employees to refer participants to who are seeking further culturally aligned support.	49 June 2025	
	50. Complete a review of the 'Understanding Economic and Financial Abuse in First Nations Communities' report, integrating the recommendations into the Next Chapter program and where gaps are identified in research, address through subsequent research.	50 June 2024	

Focus areas	Activities	Timeframe	Responsibility
Support First Nations-led and informed approaches	51. Present a proposal to our Indigenous Advisory Council to invest in the development of First Nations-led research that addresses social and intergeneration trauma in order to better understand the drivers of domestic violence and financial abuse. The proposal will include insights and feedback from First Nations stakeholders on where additional research is required as well as details on taking a First Nations-led approach to the research.	51 June 2024	51—54 Community Investment
	52. Using the research findings, partner with First Nations organisations to create frameworks to prevent domestic violence and financial abuse and effectively support those currently impacted or recovering.	52 June 2024	
	53. Share frameworks with organisations working with First Nations victim-survivors of domestic violence and financial abuse to support improved outcomes for First Nations clients. Share research, frameworks and insights via the Financial Abuse Resource Centre to support systemic change within the RAP community and beyond.	53 June 2025	
	54. Update the Indigenous Advisory Council, Aboriginal and Torres Strait Islander Community of Practice and Reconciliation Australia quarterly, seeking their insights into how we can continually support the agenda of First Nations leaders to drive improved approaches nationally.	54 March 2023	

Pillar 4: Transformation: Indigenous Customer Support Program

We aim to be a trusted source of advice and support for all customers, including First Nations customers. We are committed to supporting First Nations customers' financial inclusion and helping remove any barriers to banking they may come up against. We recognise that in order to fulfil this commitment, we require a focused plan with a deliberate set of actions. Through our Indigenous Customer Support Program (ICSP), we seek to deliver this commitment for our own customers, and share insights with our industry partners and the broader RAP community to help improve service delivery and customer outcomes where we can.

In order to better understand the experiences of our First Nations customers and to provide expert guidance on the direction of the ICSP, we have established an Aboriginal and Torres Strait Islander Community of Practice (CoP). The CoP includes First Nations peoples and non-Indigenous representatives from organisations that support First Nations people's financial wellbeing, including:

- Money Mob.
- The Centre for Aboriginal Independence and Enterprise.
- HK Training and Consultancy.
- Financial Counselling Australia.
- Indigenous Consumer Assistance Network.
- Financial Counsellor, Cape York Partnership.
- First Nations Foundation.
- Kimberley Community Legal Services.
- Foothills Information and Referral Services.

Driving systemic change within CommBank

In April 2021, key advocacy groups raised concerns about the accessibility of services for First Nations customers in remote communities. The concerns included access to our Indigenous Customer Assistance Line (ICAL), and inconsistent processes and policies, both within the bank and across the industry. Language barriers and strict identification requirements were also raised as persistent concerns for First Nations customers who are remote and isolated.

As a result of this feedback, the Office of the Customer Advocate undertook a review into the experiences of our First Nations customers. The findings led to the establishment of the Indigenous Customer Support Program (ICSP). In establishing the ICSP we recognise that we need to improve the way we bring together work underway across the Bank to ensure all business and support

units are working together to deliver better access and outcomes for First Nations customers. We have seen early improvements, including branches now being able to order replacement cards for Aboriginal and Torres Strait Islander customers who have no fixed address or live in a remote community. We have also introduced the acceptance of Larrakia community identification card to make banking more accessible for individuals who do not have standard government identification.

We recognise that there is a lot more to do to improve the financial wellbeing of remote First Nations customers, and we are committed to improving access to banking.

Encouraging systemic change within the RAP community and beyond

Through feedback and guidance from the CoP, we seek to continually improve the way in which we address systemic issues within the bank. This will provide us with unique insights that we can share with our industry partners through the Australian Banking Association and the Financial Services Reconciliation Industry Network Group as well as with the RAP community to support improving reconciliation outcomes. This includes, in part, building awareness of the importance of First Nations-led and informed approaches, and sharing improvements in our own service delivery as a result.

In addition, by sharing our insights and lessons learned via our annual RAP progress report, we hope to support the broader RAP community in improving service provision, while at the same time seeking to learn from our peers so we can improve customer experiences across the whole RAP community.

This pillar will advance reconciliation by:

- **Equality and Equity:** Improving First Nations peoples access to banking products and services, including the cultural safety within our services, will enable us to provide First Nations customers with appropriate and tailored support to improve financial inclusion.
- **Institutional Integrity:** Breaking down internal silos and working collaboratively across the bank to improve our responses to First Nations customer needs and removing barriers that are preventing First Nations peoples from accessing suitable banking products and services in a timely manner.

Strengthening financial wellbeing now and into the future

My Money Dream is an online financial literacy education program. Delivered in partnership with First Nations Foundation, My Money Dream is for First Nations peoples aged 16-60 to increase good money habits and build financial prosperity.

My Money Dream shares money knowledge from First Nation's perspectives that provide useful strategies for building wealth and wellbeing. Topics covered across the five core learning modules include culture and the economy; understanding personal financial positions, reducing expenses and eliminating debt; smart savings and automating finances.

Activities

Increase financial education and engagement

Improve accessibility of our services and services

Uplift identification, data and insights

Outcomes from 2023—25 RAP period and beyond

Outcomes for First Nations individuals, families and communities

Services and support are communicated through accessible channels in an easy to understand and culturally safe manner	Aware of the services available through CommBank's Community Wellbeing team, Indigenous Customer Assistance Line and the Financial Independence Hub		Increased opportunity to manage money and grow wealth
Feel the service is culturally safe and understanding of their needs	Are provided with culturally safe information about appropriate and affordable products and services	Are provided with referrals to appropriate, culturally safe and financial literacy and counselling services (when needed)	Increased opportunity to grow their businesses
Engage with CommBank to discuss suitable products / services	Understand options available	Take up suitable products and services	
Identification process is inclusive and streamlined	Build confidence in dealing with finances	Have a positive experience with CommBank	

Outcomes for CommBank

Employees outcomes

Access CommBank's cultural capability training	Build cultural capability	Know where to refer customers to access culturally informed support	First Nations peoples, employees and communities feel safe in their interactions with people (e.g. reduction in racism)
Feel equipped to have culturally safe conversations with customers about suitable products and services	Greater use of culturally safe approaches to working with and engaging First Nations peoples, employees and communities		

Org. outcomes

Have access to data and insights on access and inclusion	Understand and measure what financial wellbeing looks like in the First Nations context	Senior leaders leverage insights to make informed decisions that affect First Nations customers	Use data and wellbeing indicators to improve products and services	CommBank is seen as a leader in financial inclusion
CommBank has strong partnerships with a network of organisations that can deliver culturally responsive support	CommBank, partners and community learn from each other, collaborate on better solutions and improve services	CommBank, partners and community strengthen advocacy voice		

Direct CommBank outcomes

Outcomes CommBank seeks to contribute to over time

Focus areas	Activities	Timeframe	Responsibility
Increase financial education and engagement	55. Raise awareness amongst financial advocates, community organisations and customers of suitable products and services including the services available through our partnership with AusPost. Seek feedback from customers through customer conversations on the effectiveness of these services in meeting the needs of remote First Nations customers.	55 June 2025	55—56 Group Customer Advocacy and Vulnerability
	56. Work in partnership with organisations and community to deliver culturally appropriate financial education that is focused on positive financial wellbeing outcomes for First Nations Peoples. This includes working with First Nations Foundation utilising resources such as the My Money Dream financial literacy education program.	56 June 2025	
	57. Partner with Indigenous Consumer Assistance Network (ICAN) to deliver the Indigenous Financial Capability Scholarship Program to facilitate employment in financial capability roles in community services agencies. The partnership will provide 24 scholarships for the Indigenous Financial Capability Scholarship Program and 12 scholarships for the Indigenous Financial Wellbeing Leadership Scholarship Program.	57 June 2025	57 Indigenous Affairs
	58. Undertake promotional activities to increase awareness of the Bankwest ICAL service, with the communications campaign being delivered by July 2023, and a target of a 10 per cent increase in call interaction volumes by June 2025.	58 June 2025	58 Bankwest Contact Centre
Improve accessibility of our services	59. Continue our participation in the ABA ATM Fee-Free Banking Initiative.	59 June 2025	59 Self Service and Supplier Management
	60. Through our Vulnerable and Indigenous Customer Assistance team, comprising our Indigenous Customer Assistance Line (ICAL) and our Financial Assist Services teams, review team processes to ensure the customer experience is empowered, culturally informed and accessible as we create a centre of excellence for customers experiencing isolation, hardship and vulnerability.	60 June 2024	60—62 Indigenous Customer Assistance team
	61. Consult with the Aboriginal and Torres Strait Islander Community of Practice to better understand community needs and assess our ability and / or the appropriateness of expanding ICAL's coverage to include less-remote First Nations customers who require additional support to meet their banking needs; for example, including older customers or those with a disability. Present review to Indigenous Advisory Council along with key recommendations.	61 June 2024	
	62. On-board an Aboriginal and Torres Strait Islander language interpreter service to assist ICAL, where it is helpful to do so, to speak in-language with Aboriginal and Torres Strait Islander customers.	62 June 2023	

Focus areas	Activities	Timeframe	Responsibility
	63. Deliver culturally informed banking services to customers in remote communities by continuing to deliver the Bankwest ICAL service and developing an expanded centralised Bankwest ICAL team, with tailored knowledge, to deliver the service. A minimum of three additional employees will be trained to deliver the Bankwest ICAL service.	63 June 2025	63 Bankwest Contact Centre
	64. Facilitate Community Outreach by attending at least four community days/expos in communities without day-to-day access to the Bank (non-transactional banking, Covid-19 allowing).	64 June 2023	64—65 CSN Strategy
	65. Present a proposal to the Indigenous Advisory Council on a scalable and sustainable community banking service model for remote communities (this service will focus on non-transactional banking assistance in remote communities, complemented by an improved in-branch experience for First Nations communities in remote branches).	65 June 2025	
	66. Implement ways to support a simpler identification process that recognises the needs of Aboriginal and Torres Strait Islander customers.	66 June 2025	66 Group Customer Advocacy and Vulnerability
	67. Develop guidance for the business on the principles of First Nations data sovereignty to guide effective capture and use of data across the Bank, working collaboratively with First Nations peoples to determine the principles.	67 December 2023	67 Indigenous Affairs
Uplift identification, data and insights	68. Launch CommBank's Indigenous Business Growth Strategy to drive action and better support the growth of First Nations businesses and the Indigenous business sector more broadly. Strengthen CommBank's existing network of culturally accredited Business Banking Specialists and bespoke customer value proposition for First Nations businesses.	68 June 2023	68 Indigenous Business Banking
	69. Visit a minimum of two regional communities in Western Australia to gather feedback on Bankwest ICAL and identify opportunities to improve the ICAL service.	69 June 2025	69 Bankwest Contact Centre

Pillar 5: Transformation: Indigenous Carbon Economies

We are committed to supporting institutions, businesses and individuals measure, reduce and offset their carbon footprints and meet their net zero ambitions. This includes playing a leading role in accelerating the growth of the carbon market in Australia. For over a decade, our carbon markets team has enabled financing and risk management solutions across global carbon markets that support our customers to achieve their climate goals. We have deep experience in key global carbon markets, having been involved in the European Emissions Trading Scheme (ETS) since 2014. We are also active in Australian Carbon Credit Units (ACCUs), New Zealand carbon units (NZUs), Californian carbon market and International Voluntary Offsets. We believe this experience puts us in a unique position to work with First Nations communities to develop carbon economies that recognise the traditional land management practices of this country, while supporting economic development opportunities now and into the future.

Aboriginal and Torres Strait Islander peoples' rights and interests are formally recognised in over 40 per cent of Australia's land mass and carbon farming provides real and valuable opportunities for economic development for First Nations peoples and communities. While carbon projects that are owned and operated by First Nations peoples are currently a major source of supply of carbon credits (ACCUs), there are structural changes that are required to further support First Nations peoples to leverage their property rights and assets for their benefit of their communities. We are committed to supporting these changes to ensure First Nations peoples are able to fully realise the economic opportunities that come from securing property rights.

Driving systemic change within CommBank

While we believe that the opportunities for First Nations communities through carbon farming are exciting, we have a lot to learn ourselves in the best way to support them. While we are developing products and partnerships that can help First Nations communities unlock the value in carbon credits, and we can assist landholders and communities in accessing the capital required to start a carbon farming project, we understand that success is more than just having the right products.

To this end, we are building our capacity to better support the growth of this market, including supporting those who already operate in the carbon market, as well as First Nations businesses and organisations who are seeking to enter the carbon market. We also recognise the importance of taking an approach where First Nations peoples are developing self-determined First Nations economies, including carbon economies. To effectively support this outcome, we are establishing a dedicated Indigenous carbon team within Indigenous business banking, led by First Nations peoples, working across our business and institutional banks to take a First Nations-led approach to this work.

Encouraging systemic change within the RAP community and beyond

As well as contributing to systemic change within the RAP community we also want to learn from leaders in this space. Supporting a self-determined Indigenous carbon economy will require us to learn from the past, implement the lessons learned from the last 16 years of the RAP program and ensure we are contributing an economy in ways that respect First Nations knowledge and are guided by First Nations approaches. To achieve this we will host a round table event annually with First Nations community partners, First Nations leaders, selected RAP partners and industry peers to improve the awareness of, and support for, First Nations carbon projects. The round table will seek to create a safe space to share insights and challenges from those working in this area and to identify opportunities for greater collaboration across the RAP community to support First Nations leaders to grow the Indigenous carbon economy.

This pillar will advance reconciliation by:

- **Equality and Equity:** Supporting opportunities for economic development on First Nations Lands, led by First Nations peoples.
- **Institutional Integrity:** Tailoring our responses to First Nations customer needs and committing to First Nations-led responses in our business activities where they impact on First Nations peoples.
- **Race Relations:** Respecting First Nations peoples' rights and strengthening consultation with Aboriginal and Torres Strait Islander peoples as the foundation to developing stronger relationships.

Creating economic opportunities through carbon farming

Carbon markets and carbon farming have been growing over the past decade, and there are opportunities for First Nations peoples to utilise carbon farming to unlock economic development on their lands. There are two main categories carbon farming can fall under – sequestering carbon out of the atmosphere and into the landscape, or methods to avoid adding more emissions to the atmosphere.

Sequestering involves capturing additional carbon dioxide into the landscape from a new practice change on farm. This may be achieved from planting new trees or adopting new ways to enhance pasture. Plants need carbon dioxide for growth and soils need carbon for productivity. The Federal Government's net zero plan, titled "The Australian Way", forecasts that up to 17 million tonnes of carbon dioxide equivalent could be sequestered in soil carbon projects by 2050, generating \$400 million in additional revenue for landholders³.

Reducing emissions involves implementing practices that directly reduce the release of greenhouse gases. In Northern Australia, land and fire management practices can be undertaken to reduce the intensity of summer fires that normally burn at the end of the dry season.

Currently, a large proportion of carbon projects under the Savanna Fire Management methodology are owned and operated by First Nations Peoples. However, little to no projects under the vegetation method are owned by First Nations Peoples. This may be due to the higher upfront costs and capital required to establish vegetation projects under methods such as Human Induced Regeneration of a permanent even-aged native forest or Reforestation by Environmental or Mallee Plantings.

We are committed to supporting First Nations Peoples to establish and operate carbon farming projects under a range of methodologies, including vegetation methodologies, through enabling access to financing and capital, and to the secondary market.

Activities



Outcomes from 2023—25 RAP period and beyond

Outcomes for First Nations individuals, families and communities

Understand opportunities and challenges in carbon markets	Access financial and capacity building support to establish / scale their carbon enterprises	Take up suitable products and services	Aware of the products, services and supports available to them	Increased opportunity to establish and scale their carbon enterprises
Access culturally safe and appropriate products and services	Lending process feels inclusive and streamlined	Communities own/ steer the decision making	Have a positive experience with CommBank	Increased supply of diverse and commercially viable suppliers
				Increased opportunity to realise social, cultural, environmental and economic benefits of working on country

Outcomes for CommBank

Employees outcomes				CommBank is recognised as a leader in financial inclusion (for carbon markets)
Build cultural capability	Build capability in growing market	Provide skills and expertise to carbon enterprises	Employees feel proud to be contributing to change	
Org. outcomes				
Better understand the barriers to accessing finance in carbon markets	CommBank has strong partnerships with players in the carbon market space	Develop and implement solutions that remove barriers to lending at CommBank		
Share insights with the sector	Brokers relationships that influence change / grow impact	Carbon markets accelerate RAP outcomes		

Focus areas	Activities	Timeframe	Responsibility
Connect land owners to opportunities and support	70. Build partnerships to effectively support communities who are interested in establishing new carbon projects and support their readiness and capability to enter the carbon market. Report on the number of partnerships developed and the key focus of each partnership through our annual RAP report.	70 June 2023	70—71 Commodities, Trade and Carbon
	71. Provide funding to support the establishment of new projects that seek to deliver environmental, social and cultural co-benefits to First Nations peoples and communities. Report on the number of projects funded annually through our annual RAP report.	71 June 2023	
	72. Identify at least one opportunity a year for our people to work with communities to support the growth of Indigenous carbon projects through sharing skills and knowledge.	72 June 2023	72—73 Indigenous Affairs
	73. Create a communication strategy to improve opportunities for First Nations enterprises in the carbon market to grow their networks and strengthen their profile and the profile of the Indigenous carbon market sector, including by supporting First Nations peoples to share their stories about their carbon projects, their successes and their insights into entering the market.	73 June 2023	
Build our knowledge and continually improve our approaches	74. Consider how our Institutional Banking and Markets carbon trading strategy can support the First Nations carbon market by identifying well-established on-Country carbon projects and including them in CommBank trade offerings.	74 June 2023	74 Commodities, Trade and Carbon
	75. Build a program to uplift the knowledge and capability of business bankers who support First Nations enterprises engaged in the carbon market, including access to BlackCard training and sessions on carbon markets, Indigenous land rights and economic development on First Nations lands. Ahead of launching the program, present to the Indigenous Advisory Council for feedback and endorsement.	75 June 2025	75—76 Indigenous Business Banking
	76. Connect First Nations enterprises in the carbon market to products and services that meet their needs, including cash flow management, simpler access to capital, investment advisory and business management.	76 June 2025	
	77. Where carbon offsets are required to offset our residual emissions, where possible, prioritise the use of First Nations carbon units.	77 March annually	77 Supplier Diversity
	78. Work with our Indigenous economies partners and our broader business partners to develop an approach to support our customers who are seeking to offset their own carbon footprint to purchase carbon certificates that directly benefit Aboriginal and Torres Strait Islanders peoples. Present findings to the Indigenous Advisory Council for endorsement.	78 June 2024	78 Commodities, Trade and Carbon
Invest in the growth of Indigenous carbon economy	79. Meet with current and potential clients to learn from them about the persistent and systemic issues that limit on-Country economic development opportunities. Use insights to develop a roadmap to address identified issues and present roadmap to the Indigenous Advisory Council.	79 June 2023	79 Commodities, Trade and Carbon
	80. Annually sponsor a First Nations-led event focused on traditional land management to unlock knowledge and share insights for continual improvement, promote success stories and mobilise broader support from the business community.	80 June 2024	80—81 Indigenous Affairs
	81. Host a round table event annually with Indigenous economies partners, First Nations leaders, selected RAP partners and industry peers to improve the awareness of, and support for, First Nations carbon projects.	81 June 2025	

Governance and Reporting.

Focus areas	Activities	Timeframe	Responsibility
Maintain strong governance over our reconciliation programs	82. Maintain the Indigenous Advisory Council to guide development and implementation of the RAP and advise CommBank on reconciliation related matters: <ul style="list-style-type: none"> Meeting four times a year. Where Indigenous peoples are engaged with or participate in CommBank decisions or activities, including the members of the IAC and other consultative groups, ensuring they are adequately remunerated for their engagement. Maintaining an independent First Nations Chair and an appropriate gender, age and cultural mix. Ensuring a Group Executive (reporting to the CEO) maintains the role of Executive Sponsor for Yana Budjari and sits on the Indigenous Advisory Council. The Executive Sponsor will escalate issues and opportunities to the Executive Leadership Committee and CEO as required. 	82 Quarterly	82 Indigenous Affairs
	83. Maintain the Aboriginal and Torres Strait Islander Community of Practice to guide the Indigenous Customer Support Program: <ul style="list-style-type: none"> Meeting four times a year. Monitoring our compliance of Part 4 of the Code of Banking Practice as it relates to Aboriginal and Torres Strait Islander customers as a standing agenda item. 	83 Quarterly	83 Group Customer Advocacy and Vulnerability
	84. Maintain a RAP Working Group, consisting of employees with responsibility for RAP activities, to drive the implementation of actions by: <ul style="list-style-type: none"> Meeting quarterly to track, measure and report RAP progress as well as risks, stakeholder engagement and emerging opportunities. Conducting quarterly risk reviews to support integrity of our programs and relationships. Promoting RAP outcomes and stories to all employees via our intranet and yammer. Reviewing the Terms of Reference for the RAP Working Group annually. 	84 Quarterly	84 Indigenous Affairs
Measure the impact of our approaches to ensure continual improvement and share our lessons with the RAP community and Financial Services Reconciliation Industry Networking Group	85. Finalise impact measurement framework for the Reconciliation Action Plan to inform program improvements and assess the effectiveness and impact of our activities, including by participating in, and monitoring responses to the Workplace RAP Barometer to understand effectiveness of cultural development and learning opportunities. As part of our impact measurement, share insights with Reconciliation Australia.	85 June 2023	
	86. Share insights from our transformation projects with our industry partners through the Australian Banking Association and the Financial Services Reconciliation Industry Network Group as well as with the RAP community to support improving reconciliation outcomes. Seek appropriate opportunities to collaborate with like-minded organisations progress innovative approaches to advance reconciliation.	86—87 February 2023	85—87 Indigenous Affairs

Focus areas	Activities	Timeframe	Responsibility
	87. Develop a communication strategy to share our reconciliation commitment, impact and progress with our employees and senior leaders quarterly, including via the Yana Budjari Yammer page and our internal news platform, One.CBA. The strategy will also identify appropriate opportunities to communicate our reconciliation outcomes publically to positively influence national reconciliation outcomes.		
	88. Provide quarterly updates to Technology and Operations Indigenous Employment Steering Group to continually enhance the Technology & Operations Indigenous Program and collaborations across the CommBank Group.	88 Quarterly	88 HR Technology and Operations
Report on our progress	89. Implement the FY23—25 RAP actions during the implementation period of 1 July 2022—30 June 2025. Upon expiration we will: <ul style="list-style-type: none"> • Contact Reconciliation Australia to ensure our primary and secondary contact details are up to date. • Report progress and lessons learned against each commitment, including a traffic light report and register our intention to continue our reconciliation journey via Reconciliation Australia's website • Provide Reconciliation Australia with a draft FY26—FY28 RAP. • Provide a final FY26—28 RAP to RA for endorsement by 30 June 2025. 	89 June 2025	89—91 Indigenous Affairs
	90. <ul style="list-style-type: none"> • Report reconciliation progress including: • Meeting with Reconciliation Australia quarterly to report progress, challenges and lessons learned. • Completing limited assurance on, and publicly disclosing in the Annual Report, annual completion of cultural capability training; total annual Indigenous procurement spend; total Indigenous employment numbers; and ICAL call numbers. • Contacting Reconciliation Australia to request our unique link, to access the online RAP Impact Measurement Questionnaire and reporting RAP outcomes via the questionnaire annually. 	90 September annually	
	91. Encourage at least 10 per cent (1924) employees to complete the Workplace RAP Barometer.	91 May 2024	
	92. Report supply chain spend to Supply Nation on an annual basis.	92 September annually	92 Supplier Diversity

Who to contact.

Commonwealth Bank has a Customer Advocate that is committed to championing fairness for customers and works independently to improve our products, systems and processes. The Office of the Customer Advocate can be contacted at customeradvocate@cba.com.au.

The Commonwealth Bank Indigenous Affairs team can be contacted at reconciliationactionplan@cba.com.au to discuss any aspect of our RAP further.

The Bankwest Sustainability team can be contacted on bankwestinthecommunity@bankwest.com.au.

FY20-22 Reconciliation Action Plan progress.

Due to COVID-19, the FY20 focus shifted to implementing an appropriate and timely mechanism to understand the impacts on COVID-19 and provide accessible banking for regional and remote customers. During the early stages of the pandemic, through to the easing of restrictions for remote Indigenous communities, a COVID-19 Indigenous customer and community working group was established to provide guidance to our customers and community groups on COVID-19 support. The working group initially met weekly and comprised representatives from Retail Banking (branch network), Indigenous Customer Assistance Line, Indigenous Business Banking, Indigenous Supplier Diversity, Group Customer Advocacy and Vulnerability and Indigenous Affairs. The working group was tasked with discussing directly with customers, community organisations and stakeholders the impact of the pandemic on Indigenous customers' ability to access bank services and overall financial wellbeing. The working group was also responsible for progressing appropriate solutions or sharing community feedback with the relevant internal and external stakeholders. Lessons from this approach have helped to inform our ICSP and improvements to our feedback mechanisms.

COVID-19 also saw the delivery of BlackCard converted from a full day in-person workshop, to a three-hour virtual workshop. The virtual model has been highly effective in increasing completion of introductory training across our regional teams in particular. As a result, we will continue to offer virtual and in-person BlackCard training as a level 1 program, with the full day in-person workshops providing deeper learning for key teams across the bank.

One of the biggest challenges has been increasing First Nations representation across our domestic workforce. While we have a solid strategy with supporting initiatives in place to help us meet this target, it requires unwavering focus to maintain momentum. The disruptions from the last two years or more changed the way we work and this impacted the delivery of our Indigenous careers programs, as remote working created challenges in providing the support and supervision that is essential to the success of our pathway programs. In June 2019, our audited data highlighted we had met our interim target of 1.5 per cent; however, in June 2020 we recorded a decrease, bringing the total representation of Aboriginal and Torres Strait Islander peoples across our domestic workforce to 0.8 per cent. After becoming aware of the decrease, we completed a number of internal and external activities including facilitating listening sessions with First Nations employees; understanding First Nations peoples experience during the recruitment period and as an employee of the Bank; and piloting an Indigenous Guaranteed Interview Scheme, which expedites First Nations candidates who meet minimum role requirements to interview stage. These changes have seen a small increase in First Nations representation across the bank, moving from 0.8 per cent to 0.9 per cent. They have also helped inform our FY23-25 Indigenous Careers Attraction Strategy.

While the FY20-22 RAP period brought unexpected challenges, we also achieved a number of outcomes that helped progress our reconciliation priorities. We have elevated three areas of our FY20-22 RAP as part of our commitment to drive transformational change internally and externally, while a number of areas continue to be embedded as part of our foundation pillars. Summary highlights from the past three years include:

Focus area	Status*	Summary highlights
Pillar 1: Cultures and Community		
1. The impacts of lending and investment decisions on Indigenous peoples and communities are considered and managed.	In progress: Further embed in FY23-25 RAP: Pillar 1, Focus area 1.	<ul style="list-style-type: none"> Our commitment to respecting Indigenous Rights and Free, Prior and Informed Consent (FPIC) has been included in our Environment and Social Policy. Guidance has been developed on this commitment and is now being embedded into business processes. We have undertaken a review of our feedback mechanisms across human rights (including Modern Slavery and Indigenous Rights). Areas of uplift have been identified, with work underway and due to be completed by the end of 2022.
2. Aboriginal and Torres Strait Islander histories, cultures and rights are a valued and recognised part of a shared national identity.	Achieved: Further embed in FY23-25 RAP: Pillar 1, Focus area 2.	<ul style="list-style-type: none"> 75 per cent of employees completed at least one form of cultural learning over the FY20-22 RAP reporting period. We supported Uphold and Recognise to build bi-partisan support towards a Voice to Parliament. As part of National Reconciliation Week 2021, a panel conversation was held to discuss Uluru Statement and the Voice. The theatre at the new Head Office at Tumbalong (Darling Harbour) has been named Yana Budjari Theatre, meaning "Come Together You Mob" in the Dharawal language. Kuku Yalanji and Woopaburra artist Leona McGrath created artwork which visually expresses CommBank's refreshed brand and values. The artwork is intended to be weaved through the fabric of the Bank including branches, digital assets and on uniforms. Yawuru woman Justine Kinney also designed uniform items for Bankwest.
3. Our employees build positive two-way relationships, based on trust and respect, with Aboriginal and Torres Strait Islander customers and communities.	Achieved: Further embed in FY23-25 RAP: Pillar 1, Focus area 3.	<ul style="list-style-type: none"> We continued to celebrate National Reconciliation Week and NAIDOC Week each year, with our people hosting or attending events across the country. A 2020 survey of employees found that 56 per cent of respondents had participated in an event to acknowledge these significant weeks. In 2020 we held a 'Conscious inclusion: A conversation about race' event to facilitate a conversation about the Black Lives Matter movement in the Australian context. Sian Lewis, Group Executive Human Resources and Executive Sponsor of Yana Budjari (CBA) hosted a discussion with Priscilla Brown, former Group Executive Marketing and Corporate Affairs (CBA), Mick Gooda, Former Aboriginal and Torres Strait Islander Social Justice Commissioner, and Chin Tan, Race Discrimination Commissioner. Supporting the execution of our strategy to build stronger, localised relationships, the Yana Budjari committee has matured to include State-based committees, with State Co-Leads, who are empowered to drive local engagement.
Pillar 2: Education and Careers		
4. Aboriginal and Torres Strait Islander youth have the right support to achieve their personal and career goals.	Achieved: Refocus towards community engagement in FY23-25 RAP: Pillar 1, Focus area 3.	<ul style="list-style-type: none"> We supported AIME to produce a scalable business model that introduces the AIME curriculum to teachers across Australia, helping to alleviate educational inequality. We support our CareerTrackers alumni to continue to support the CareerTrackers program by volunteering to speak and mentor First Nations youth. The promotion of our CommBank Bush Fire Grants through the Aboriginal and Torres Strait Islander community saw Mia Mia properties Inc successful in receiving a \$50,000.00 grant to support the reconstruction of Illaroo Farm, enabling the reinstatement of school camps, workshops, fundraisers and cultural learning experiences for Indigenous and non-Indigenous peoples. The Financial Services business unit committed \$50,000 to the University of Queensland's endowed Indigenous scholarship fund.

Focus area	Status*	Summary highlights
5. Our workplaces are inclusive and Aboriginal and Torres Strait Islander employees feel safe to be themselves.	Achieved: Progress through Respect Lives Here going forward.	<ul style="list-style-type: none"> As part of the 'Respect Lives Here' initiative and with the University of NSW, we conducted a survey of our people's experiences of respectful and disrespectful behaviours and the impact they have at work. To provide a benchmark of the experiences of our people, including First Nations employees, to guide practical actions to promote an inclusive workplace.
6. Aboriginal and Torres Strait Islander peoples have equal opportunities to develop a career in the financial services sector.	In progress: Further embed in FY23-25 RAP: Pillar 2, Focus area 4.	<ul style="list-style-type: none"> As at September 2021, the Your Voice Survey reported employment of First Nations peoples across the Bank was 0.9 per cent. The Guaranteed Interview Scheme is embedded in the talent acquisition process and has resulted in increases in the number of First Nations candidates that progress to interview stage. In FY22 we exceeded our FY21 external hire rate with 124 hires. We also had 28 First Nations university interns joining our Summer Internship Program. Six First Nations employees joined the Technology and Operations Academy in FY22, bringing the total number in the program to 11. Two existing Academy members graduated from the program and secured permanent roles in Technology. A refreshed FY23-25 Indigenous Careers Attraction Strategy has been approved by the HR leadership team and aims to significantly uplift hiring across the business.
7. Aboriginal and Torres Strait Islander employees are supported to progress their careers and take on management and senior level positions.	Achieved: Further embed in FY23-25 RAP: Pillar 2, Focus area 5.	<ul style="list-style-type: none"> 15 First Nations employees have undertaken leadership development with external organisations during the last reporting period. The Indigenous Careers team is aware of 42 First Nations employees who moved internally into another role during FY22.

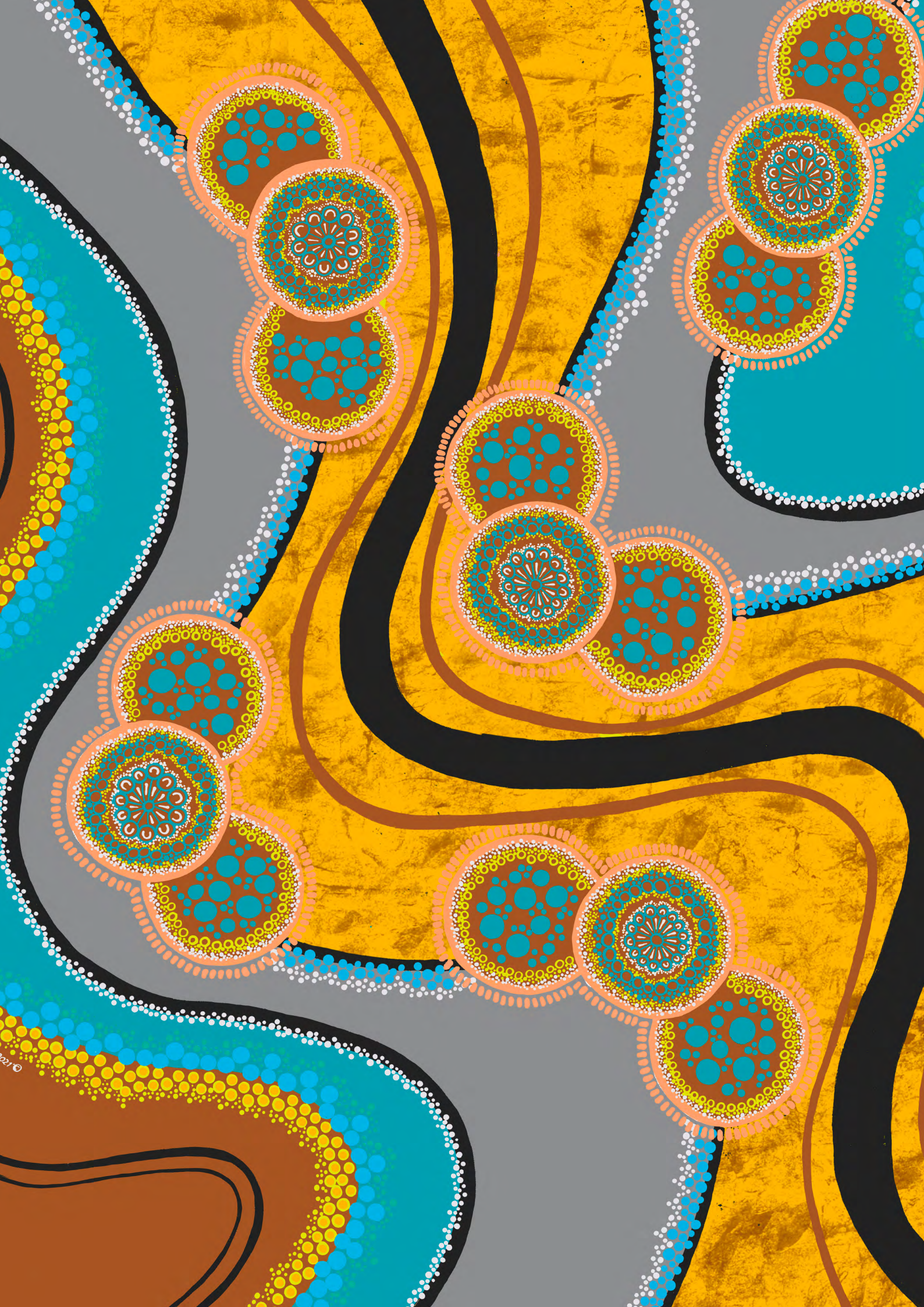
Pillar 3: Financial Wellbeing

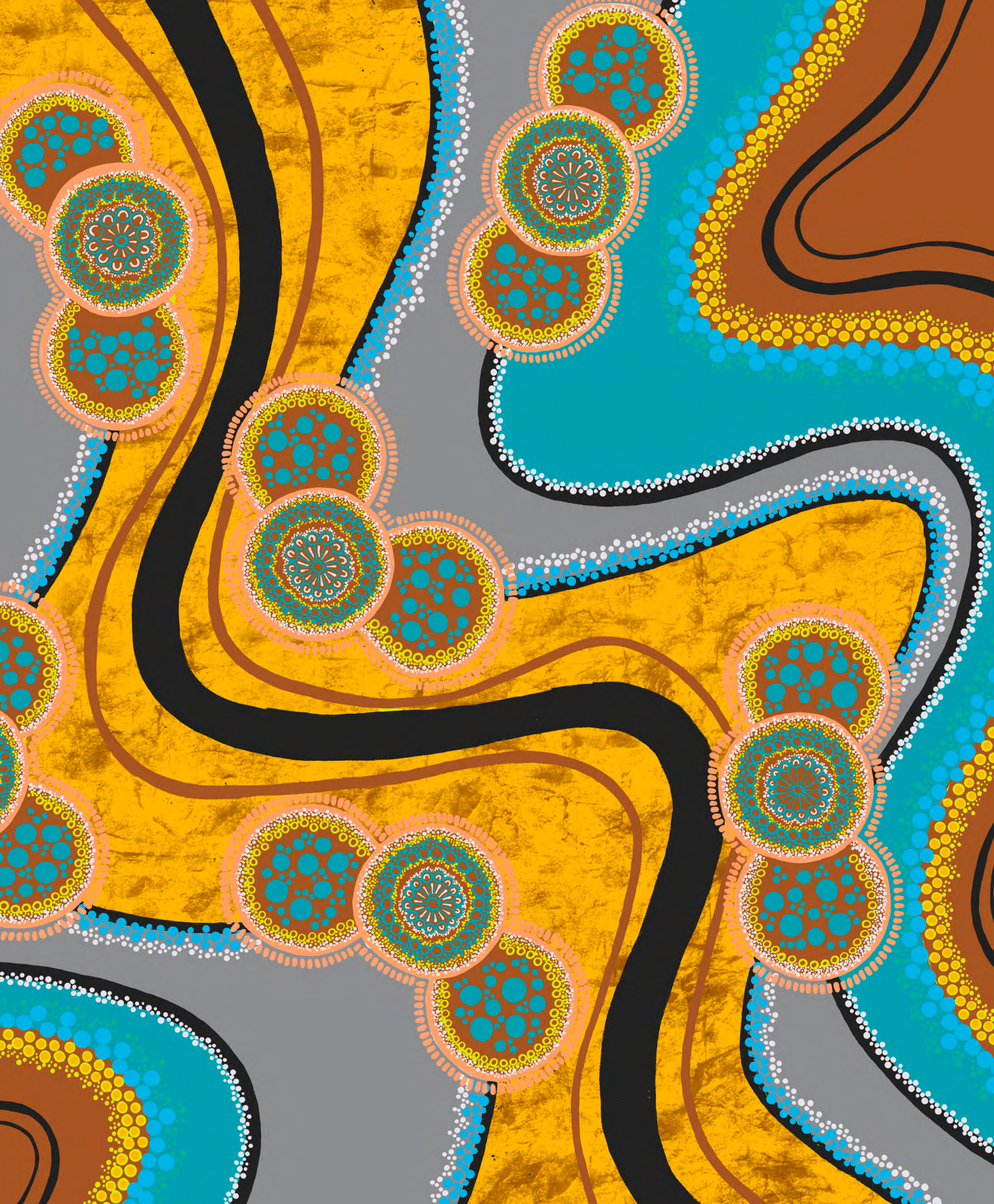
8. Aboriginal and Torres Strait Islander peoples' financial wellbeing is supported in a culturally informed way.	Achieved: Elevated area of focus through Transformation Pillar 4.	<ul style="list-style-type: none"> The Indigenous Customer Support Program (ICSP) was endorsed by the CommBank Board in 2021. The program will form one of the transformation programs in the FY23-25 RAP. In FY22, there were 184,927 calls to our Indigenous Customer Assistance Line, a slight increase on FY21, when 181,460 calls were received. Our customers are eligible to access select fee-free ATMs in some of Australia's most remote communities. Here's the full list of participating ATMs with fee-free access. For customers who hold the following Commonwealth of Australia concession cards: Commonwealth Seniors Health Card, Pensioner Concession Card and Health Care Card, CommBank offers the Streamline Basic Account and Bankwest offers the FeeSaver Basic Account. For eligible customers, the accounts include no monthly account fees, no assisted withdrawal fees, unlimited free electronic withdrawals and no overdrawing approval fees or dishonour fees. These accounts do not earn interest. Other charges may apply. We partnered with the First Nations Foundation to create the My Money Dream program to provide financial education designed by First Nations people, for First Nations people.
9. The cultural, social, political and economic aspirations of Aboriginal and Torres Strait Islander peoples and communities are recognised and supported.	In progress: Elevated area of focus through Transformation Pillar 5.	<ul style="list-style-type: none"> To progress this outcome, we will focus on supporting the establishment and growth of Indigenous carbon economies as one of the transformation programs in the FY23-25 RAP. As part of our journey to carbon neutrality, we purchased carbon credits from First Nations businesses. We continued to support the Jawun program through COVID-19 pivoting to virtual delivery. Over the last three years, 46 CommBank employees completed either a virtual or in-place secondment with Jawun.

Focus area	Status*	Summary highlights
10. Aboriginal and Torres Strait Islander businesses have access to financial products, services, support programs and networks for whatever stage their business is at.	In progress: Elevated area of focus through Transformation Pillar 4.	<ul style="list-style-type: none"> We partnered with Supply Nation to fund their DRIVE Program. This training program is focused on building skills to support Indigenous businesses wanting to supply to corporates and government. To help our suppliers navigate their supply chain and cash flow challenges as a result of COVID-19, in FY21 we put in place immediate payment terms for our Australian First Nations and small business suppliers. We have recruited an Executive Manager, Indigenous Business Banking to lead the development and implementation of a new Indigenous Business Banking Strategy. We launched the Cyber Security for Indigenous Businesses and the Indigenous Guide for Board Members.
11. Aboriginal and Torres Strait Islander businesses have equal access to procurement opportunities.	In progress: Embed further in FY23-25 RAP: Pillar 2, Focus area 6.	<ul style="list-style-type: none"> We increased our spend with First Nations businesses from \$2.9m in FY19 to more than \$7.0m in FY22. In 2021, we were awarded the Supply Nation Supplier Diversity Partnership of the Year Award with BlackCard for our work on cultural diversity training and assisting BlackCard to pivot to online training when COVID-19 prevented face-to-face training. We executed a number of activities across the FY20-FY22 RAP period to progress our strategy to support First Nations businesses, including: <ul style="list-style-type: none"> Further aligning our recognition of First Nations businesses to the Commonwealth Government's Indigenous Procurement Policy. This includes Supply Nations certified businesses, the Office of the Registrar for Indigenous Corporations (ORIC) enterprises, Indigenous Chamber of Commerce registered business and in 2022, businesses that are able to provide a certificate of Aboriginality/Indigeneity as evidence of First Nations business ownership; Developing a strong relationship between the Supplier Diversity Manager and the Retail Banking Indigenous Engagement team to facilitate opportunities for our largest business unit to support small First Nations business spend. This relationship has resulted in the development of a regional First Nations business register; Pivoting to one-on-one video conferencing during the pandemic, replacing our Meet-the-Buyer events.
12. Procurement processes, policy and Supplier Code of Conduct recognise and/or consider the rights of Indigenous peoples.	Achieved: Embed further in FY23-25 RAP: Pillar 2, Focus area 6.	<ul style="list-style-type: none"> Our Supplier Code of Conduct was revised to include relevant international standards related to the rights of Indigenous peoples.

Governance and Reporting

13. Strong, accountable governance is maintained to ensure RAP actions are implemented on time and in a way that creates impact.	Achieved: Maintain in FY23-25 RAP: Governance.	<ul style="list-style-type: none"> The Indigenous Advisory Council meet four times a year to oversee the strategic direction of our reconciliation program. An Aboriginal and Torres Strait Islander Community of Practice was established, comprising financial counsellors and community advocates, to support the implementation of the ICSP. The RAP Working Group continues to mature, with most BU/SUs now having an Indigenous Engagement Specialist driving their reconciliation strategies and representing their BU/SU on the working group. First Nations peoples fill most of these roles.
14. Progress towards implementation of RAP actions is reported in a transparent manner.	Achieved: Maintain in FY23-25 RAP: Reporting.	<ul style="list-style-type: none"> We have finalised the FY22 audit of our employment, supplier diversity, Indigenous Customers Assistance Line calls and cultural capability training participation.





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