2026

People, Safety, Conduct and Fitness Policy

GoodLoop

Version:	**21.0**
Version Date:	**June 2026**
Manager:	**CEO**
Review Frequency:	**24 months**
Review Date:	**June 2028**
Reviewer:	**Board**

Table of Amendments

Version	Release Date	Description/History	Approved By

21.0	1 July 2026	• Full Review and updates
		• Inclusion of Responsible Person coverage under this Policy
		• Update to Title (to incorporate safety)
		• Strengthening Respect & Inclusion Policy (including updated definitions and inclusion of bullying definition)
		• Removal of Redeployment and Redundancy section (covered under legislation and employment instruments)
		• Inclusion of new policies
		  • Workplace Health and Safety Policy
		  • Grievance Handing Policy
		  • Privacy Policy
			Board

20.0	3 June 2025	Review to amend motor vehicle policy	ARF
19.0	27 February 2024	Review to remove Responsible Person from Policy	Board
18.0	18 April 2023	Review for creation of Bendigo Community Bank structure	Board
17.0	24 August 2021	Annual Review	Board
16.0	30 June 2020	Annual Review	Board
15.0	28 February 2019	Annual Review	Board
14.0	18 November 2018	Annual Review	CCC
13.0	02 November 2017	Annual Review	Board
12.0	14 December 2016	Annual review	Board
11.0	27 August 2015	Annual Review to meet change from ADI status	Board
10.0	26 June 2014	Annual Review	Board
9.0	30 May 2013	Annual Review	Board
8.0	28 June 2012	Board matrix changes	Board
7.0	26 April 2012	Annual Review - APRA Recommendations	Board
6.0	27 October 2010	Securitisation Review	Board
5.0	24 September 2009	Annual Review	Board
4.0	31 July 2008	Annual Review	Board
3.0	30 August 2007	Annual Review	Board
2.0	31 August 2006	Reviewed to meet requirements in the finalised APS 520 and to provide for the development and review of System Notes	Board
1.0	28 July 2005	New Policy	Board

Helping communities thrive

Changes made under version 18.0 of this Policy reflected amendments made to previous policies for the purpose of establishing the policy structure for the creation of the **Bendigo Community Banks Branches** which are operated by **Service One Financial Services**. It amalgamated a number of previous **GoodLoop** Mutual (formerly Service One Mutual) policies, such as:

- Fit and Proper Policy;
- Conflict of interest Policy;
- Staff – Conduct Monitoring Policy;
- Staff Employment, Training and Redundancy Policy; and
- Whistleblowing Policy.

Contents

Helping communities thrive

1. Introduction

1.1. Document Purpose

The setting and maintenance of appropriate conduct, fitness, and propriety standards is central to the overall achievement of **GoodLoop**, and the **GoodLoop Group's**, strategic, contractual and policy objectives. Some of these requirements, and their form, are mandated by **Bendigo** as part of the **Franchise Agreement** applying to **Service One Financial Services** in its operation of a number of **Bendigo Community Bank Branches**.

Additionally, some issues, such as fitness and propriety obligations, are required to be maintained in compliance with the terms of the **GoodLoop** Constitution. While **GoodLoop,** and **SOFS,** have different roles, responsibilities and contractual obligations within the **GoodLoop Group,** the Board of **GoodLoop** has resolved that this Policy will apply to all **Group** companies unless specifically stated in the introduction to a section. This is on the basis that this Policy, particular amongst the suite of **GoodLoop** and **SOFS** policies, stands as a central underpinning of our corporate and individual decisions, actions and behaviours.

1.2. Policy Objective

This Policy will cover the following areas:

- Fitness and Propriety for employees of Group companies;
- Code of Conduct;
- Staff employment, training, and monitoring (including performance reviews and disciplinary matters);
- Staff remuneration policy;
- Diversity policy;
- Anti-bullying, harassment (including sexual harassment) and discrimination;
- Conflict of Interest;
- Anti-bribery and corruption;
- Corporate uniform;
- Staff travel and accommodation;
- Motor vehicle policy;
- Staff leave standards;
- Whistleblowing Policy.

1.3. Committee Approval

The Board approved this policy on the 30 June 2026.

1.4. Effective Date

The effective date of this Policy is 1 July 2026.

1.5. Review

July 2028.

1.6. Nomenclature

The definition of terms in BOLD, other than the section headings, are contained in the Glossary.

Glossary of Terms

Bendigo and Adelaide Bank (Bendigo)	Bendigo and Adelaide Bank Limited ABN 11 068 049 178
Bendigo Community Bank Branches	A Community Bank Branch permitted to be operated by SOFS under the Franchise Agreement with Bendigo
Franchise Agreement	Community Bank Franchise Agreement between SOFS and Bendigo and its associated documents and agreements
Group or Group entities	Either, or both, GoodLoop Mutual or Service One Financial Services, as the case requires
GoodLoop Group	GoodLoop Mutual and its subsidiary companies
GoodLoop Mutual (formerly SERVICE ONE Mutual – SOM)	GOODLOOP Mutual Limited ABN 42 095 848 598
Service One Financial Services (SOFS)	The wholly owned subsidiary Service One Financial Services Propriety Limited ACN 662 398 272
Social Enterprise	Investments undertaken by GoodLoop Mutual as part of its social enterprise activities
Strategic Plan	The Strategic Plan approved by the Board for GOODLOOP Group company

2. Policy Background

2.1. General

To avoid duplication and to assist directors and employees to remain across the requirements of specific aspects of this Policy, in so far as they relate to compliance with the terms and conditions of the **Franchise Agreement**, the Board has determined to adopt, by reference, applicable **Bendigo** policies that have been approved to cover the activities of community bank companies.

For instance, under the **Franchise Agreement**, **SOFS** is required to ensure that directors and employees comply with other standards of conduct, such as **Bendigo's** Code of Conduct. Moreover, these conduct obligations have also been extended to **GoodLoop Mutual**, and **GoodLoop Mutual** Directors and employees, through the provisions of the Support Deed that **GoodLoop Mutual** (formerly Service One Mutual Ltd) and **Bendigo** entered as part of the **Franchise Agreement**.

Bendigo's community bank policy structure also mandates the adoption of a Whistleblowing Policy and a Local Marketing Policy (**Bendigo** has specific policies for both matters).

To comply with a **Bendigo** Policy clearly requires **GOODLOOP Group** directors and employees to read the **Bendigo** Policy by replacing references to **Bendigo**, or **Bendigo** specific matters, with references to **GoodLoop Mutual**, or **SOFS**, or a **Group** policy or procedure, as the case requires.

Where a **Bendigo** Policy has been adopted, by reference, the relevant section of this Policy will provide guidance on any amendments that need to be read into the Policy in its application to a **GOODLOOP Group** company. For instance, the replacement of **Bendigo**'s Corporate Values as set out in the Code of Conduct, for **GoodLoop Mutual's** corporate values as set out in its Board - Governance Policy.

In so far as this policy imposes any obligations on the **GoodLoop Group** company (ie those additional to those set out under legislation), those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees (i.e. those additional to those set out under legislation), they are discretionary in nature and are also not intended to be contractual. The terms and conditions of employment that are intended to be contractual are set in an employee's written employment contract or instrument of employment.

The **GoodLoop Group** may unilaterally introduce, vary, remove or replace any policies at any time.

2.2. Employee Conduct

It is not the **GoodLoop Group's** policy position to interfere in the private and personal lives of employees. However, it should be noted that how employees conduct themselves both during business hours, and otherwise, can reflect upon the reputation and integrity of the **Group**. Moreover, employees have a duty of care to act in the best interest of their employer within the **GoodLoop Group** and therefore the terms of this Policy are enforceable. It is also a requirement of the Franchise Agreement for the conduct of the **Bendigo Community Bank Branc**hes that directors and employees of **SOFS** do not do anything that could harm the reputation of **Bendigo**.

3. Fit and Proper

3.1. General Provisions applying to all Staff

This Policy constitutes the Fit and Proper Policy for **GoodLoop,** and the **GoodLoop Group**, for staff, directors, secretaries and Chief Executives/Managing Directors.

4. Workplace health & safety policy

GoodLoop is committed to providing a safe and healthy workplace, safe working methods, and the provision of safe equipment. Workplace health and safety is considered by management to be an integral and vital part of the successful performance of any job.

GoodLoop, as a person conducting a business or undertaking (PCBU), is committed to:

- Integrating workplace health and safety into all aspects of its operations;
- Identifying hazards, assessing risk and implementing control strategies to minimise risk of injury to people and property;
- Ensuring that relevant health and safety laws that apply to working conditions and the work environment are observed and enforced;
- Developing and implementing safe systems of work;
- Providing adequate safety information, training and supervision;
- Designing, purchasing, installing and maintaining a safe site and machinery;
- Ensuring that the workplace under their control is safe and without undue risks to health;
- Ensuring that the behaviour of all persons in the workplace is safe and without undue risks to health;
- Attempting to remedy all problems relating to workplace health and safety;
- Consulting with workers and other parties to address safety issues and improve decision making on workplace health and safety matters; and
- Supporting and assisting workers in effective injury management and rehabilitation.

All employees and contractors are required to:

- Adhere to safe work practices, instructions and rules;
- Immediately report any unsafe work condition or equipment to the Company;
- Immediately report any injury or illness sustained at work or in the performance of work duties (no matter how minor) to the Company;
- Not misuse, damage, refuse to use, or interfere with anything provided in the interest of workplace health and safety;
- Perform all work duties in a manner which ensures individual health and safety and that of all other people in the workplace;
- Encourage fellow employees to create and maintain a safe and healthy work environment; and
- Co-operate with all other employees to enable the health and safety responsibilities of all employees be achieved.

4.1. Communication and Consultation

We recognise that employee consultation and participation in our safety system is vital and improves decision–making about health and safety matters in the workplace. Consultation is also included in the process of risk assessments and the development of our safe work practices.

Employees shall be actively involved in the workplace safety system. Suggestions for change and improvements to policies, procedures or safe work practices are encouraged, through reporting to management. Meetings to consult and inform employees on safety issues shall be conducted through staff meetings, as regularly as is necessary.

Employees shall be made aware of safety issues relating to their jobs on a regular basis.
The manner of doing so will vary depending upon the type of information to be conveyed.

We expect our employees to be committed to working with management in order to effectively manage health and safety on the job. Employees are encouraged to contribute to decisions that may affect their health and safety in the workplace, through contact with management and staff meetings.

Management shall work in conjunction with employees to review and update this and other policies and procedures.

4.2. Workplace Injuries—Rehabilitation and Return to Work

GoodLoop is proactive in its approach to injury management and places strong emphasis on the safe, timely and sustainable return to work program for injured or ill workers.

We are committed to:

- Prompt injury notification;
- Communication and consultation with all parties to develop an appropriate return to work program;
- Accountability and responsibility for injury management being clearly understood;
- Provision of suitable meaningful activities during the return-to-work process; and
- Dispute resolution as required.

The Company will ensure the following positive approach in meeting these objectives, including:

- Early reporting of injuries;
- Appropriate and timely medical intervention and return to work planning;
- Provision of suitable resources and productive duties for the injured worker;
- Positive support and encouragement during the rehabilitation process; and
- Review of incidents and accidents to seek preventive measures and continuous improvement.

The Company shall work in conjunction with employees to review and update this policy and other policies and procedures relating to work health and safety as regularly as is necessary.

5. Code of Conduct

5.1. General Provisions

Under the terms of the **Franchise Agreement**, **SOFS** is required to adopt **Bendigo's** Code of Conduct. Additionally, **SOFS** is required to adopt the Corporate Values of **Bendigo**. As noted in the Board - Governance Policy, the Board of **GOODLOOP** believes that the corporate values and beliefs of **GOODLOOP**, while different from **Bendigo's**, are both compatible and complimentary.

In that regard the framework and expectations established by **Bendigo's** Code of Conduct readily translate to **GoodLoop's** values and beliefs and represent an appropriate basis by which employees can adjudge their actions against either set of corporate values and beliefs. **Bendigo's** Code of Conduct is therefore adopted for the **GOODLOOP Group**.

However, in reading the Code, **GoodLoop** employees need to replace references to **Bendigo**, or **Bendigo's** Corporate Values with **GoodLoop** and **GoodLoop's** values and beliefs, as the case requires. Employees of **SOFS** will need to replace references to **Bendigo** with **SOFS**. Any references to Policies should be read as a reference to the relevant policy within the **GOODLOOP Group** (this may be a **Bendigo** Policy).

For **SOFS** employees, a copy of the **Bendigo's** Code of Conduct can be found on BENnet on the Policy Hub.

5.2. Specific Conduct Obligations

In addition to the above requirements, **GOODLOOP Group** employees must also comply with the follow general, and specific, conduct obligations as part of their obligations to adhere to the values and beliefs applying to **GoodLoop Mutual Ltd**, or **SOFS** under its **Franchise Agreement** with **Bendigo**.

The **GoodLoop Group** requires that all employees conduct themselves according to the highest standards of ethics, integrity, and behaviour when dealing with our customers, the public, colleagues and other stakeholders. This includes, but is not necessarily limited to, full compliance with all legal obligations imposed by statute or any other source of law.

This Code establishes the standards of behaviour that must be met by employees and directors of the **GoodLoop Group**. Where these standards are not met, appropriate disciplinary action will be taken. In cases where the breach involves serious misconduct, this may result in summary dismissal. In cases where a breach of the policy involves a breach of any law, then the relevant government authorities or the police may be notified.

Employees will:

- Perform their duties impartially, with professionalism, objectively and integrity;
- Work effectively, efficiently and economically;
- Behave fairly and honestly, including reporting others who may be behaving dishonestly;
- Compliance with all Company and workplace policies, procedures, rules, regulations and contracts;
- Compliance with all laws;
- Devotion of the employee's entire time, attention and skill during normal working hours and at other times as reasonably necessary for the employee to perform their duties;
- To be honest and fair in dealings with customers, clients, co-workers, Company management and the general public, and to treat them with courtesy and respect;
- To work in a safe and compliant manner, and to observe all workplace health and safety rules and responsibilities;
- Refraining from any discriminatory, bullying or harassing behaviour toward customers, clients, co-workers, management and the general public;
- To not engage in conduct, whether during or after work hours, that could cause damage or potential damage to the Company's property or reputation;
- To not use, or come to work while affected by use of prohibited drugs or alcohol;
- To ensure and maintain punctuality;
- To respect Company property;
- To dress in an appropriate manner and to ensure that appearance is presentable, clean, neat and tidy (including but not limited to wearing any uniform that is required of you);
- Accept, and obey all, reasonable and lawful instructions from managers and supervisors, and where they have concerns about any such instruction refer the matter to their most senior manager or the Chief Executive or Managing Director of their employing **Group** company;

- Not partake in or be a bystander in any form of bullying, harassment (including sexual), victimisation, discrimination, exploitation or power imbalances in personal relationships in the workplace.

It is particularly important that personal behaviour at business, training or social functions organised by or under the auspices of a **GoodLoop Group** company be such as to ensure that the image and reputation of the **Group** is in no way compromised or damaged. **SOFS** has specific obligations to protect, and not harm, the reputation of **Bendigo**.

Employees must not borrow money from other employees, or from persons who are undertaking business or transactions with a **Group** company. All employees should ensure that they maintain their personal finances in good order, including ensuring sufficient funds are available to honour payments and the timely payment of bills and loans on due dates.

Employees who find themselves in financial difficulties should discuss the matter with a Senior Manager with a view to developing an action plan to address the situation. It should be noted that the Senior Manager is required to disclose an agreed action plan to the Chief Executive or Managing Director of the employee's employing **Group** company.

5.3. Communications and Public Comments

No employee of a **GoodLoop Group** company, other than the Chairperson of the Board, Chief Executive or Managing Director, is authorised to make public comment for, or on behalf of, a Group company. The Chief Executive, or Managing Director, may specifically authorise one or more staff to use social media platforms to represent the interests of a **GoodLoop Group** company. Where this occurs any public comments must adhere to the Social Media Guides at all times.

While employees have the right, as private citizens, to express personal views across a variety of topics and subject matter care should be taken at all times to not give the impression that any comments represent the views or position of a **GoodLoop Group** company, or **Bendigo**.

Similarly, you should not engage in conduct which involves the posting or re-posting, of material that is offensive, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright, constitutes a contempt of court, breaches a Court suppression order, or is otherwise unlawful.

GOODLOOP Group employees must always adhere to **Bendigo** policy when commenting on, or making changes to, any material that is posted by the **Bendigo Community Bank**.

5.4. Confidentiality of Information

All **GoodLoop Group** employees are required to sign an Employee Confidentiality Agreement upon commencement. This requires that all employees hold any Confidential Information, as defined in the Agreement, in strict confidence and must take all steps necessary to preserve its confidentiality.

Those persons who engage with us for services expect their affairs will not be disclosed, without permission, to any third parties and it is essential that the confidentiality be observed absolutely.

Information gained about any person while working at a **GoodLoop Group** company, or about the **Group** itself, or **Bendigo**, must be treated as strictly confidential and should be used ethically and with integrity. Further, employees should not access other employee's information except for a legitimate reason such as processing a transaction or a loan application.

On resignation, employees continue to be bound post-employment and confidentiality obligations in relation to information obtained in the course of your employment within the **Group** continue to apply.

5.5. Conflict of Interest

The proper identification and management of, actual, perceived or potential conflicts of interest is central to the **GoodLoop Group** meeting its regulatory, Constitutional, and contractual obligations. The proper management of conflicts of interest are particularly important in relation to the management and contractual obligations that **SOFS** has to **Bendigo** under the **Franchise Agreement** related to the operation of a number of **Bendigo Community Bank Branches**.

Conflicts of interest can exist at all levels of an organisation and therefore the requirements of this Policy apply to all directors and employees within the **GoodLoop Group**. There are particular conflict of interest obligations that apply in relation to the undertaking of consumer credit activities on behalf of **Bendigo** and special attention needs to be paid to these requirements.

There are also specific obligations contained in the **Franchise Agreement** related to not competing with **Bendigo**, or **Bendigo** related companies, in the provision of specified activities.

There are three types of conflict of interest:

- Actual – a direct conflict between someone's current duties and responsibilities and an existing private interest;
- Perceived or apparent – when it appears or could be perceived that someone's private interest could improperly influence the performance of their duties, whether or not this is the case;
- Potential – where someone has private interests that could conflict with their duties in the future.

To further assist employees the following are examples of matters that might give rise to a conflict of interest. The examples below are not exhaustive. If in any doubt an employee should seek the advice of a senior manager.

A business, professional, personal, family or cultural relationship or association with another person or organisation that is a Member of **GoodLoop Mutual Ltd** or that deals with, or is likely to deal with, a **GoodLoop Group** entity in a business, commercial or community relations capacity.

'Personal' or 'family' or 'cultural' relationship or association includes family relationships, friendships and membership in a club, community group, political party or other association that is a Member of **GoodLoop Mutual Ltd** or that a **GOODLOOP Group** entity deals with, or a **GoodLoop Group** entity is likely to deal with a business, commercial or community relations capacity.

'Business' or 'professional' 'relationship or association' includes being an owner of, shareholder in, Director of, or employee of, any person or organisation that provides or is likely to provide a service to a **GoodLoop Group** entity or an entity that has or is likely to have a business, commercial, or community relationship with a **GoodLoop Group** entity.

To ensure compliance with the obligations of this Policy, employees must:

- Where practicable, avoid placing themselves in a situation where there may be a conflict between the interest of the **GoodLoop Group**, or **Bendigo**, and their own, professional, business or personal interest;
- Disclose any conflicts of interest whether actual, perceived, or potential, that may compromise their ability to act independently in any dealings between, or on behalf of, the **GoodLoop Group** and/or **Bendigo**, and its Members, customers or third parties;
- Disqualify themselves from participating in any decision, deliberation or any other action or dealing between the **GoodLoop Group** and its Members, shareholders, or business partners because of actual, perceived, or potential conflicts of interest; and
- Not act in their own interest in preference to the interests of the **GOODLOOP Group** and/or **Bendigo**.

5.6. Conflict of Interest Reporting

All conflicts of interest covered by this Policy must be disclosed and either avoided, managed or controlled. There are different requirements as to the process to be followed depending on who the conflict of interest applies to.

While all conflicts of interest are important, greater relevance applies to conflicts that arise for persons who are in senior positions, such as Directors, Chief Executives/Managing Directors and senior managers. The **GOODLOOP** Constitution (Section 16) has specific provisions that deal with conflicts of interest that should be considered when dealing with conflicts of interest disclosed by Directors of **GoodLoop**. But they also represent a useful guide as to how to deal, more generally, with such matters.

The types of conflicts of interest that might apply to staff are generally of a more practical nature – not to conduct any transactions on your own, or a family members, account; do not approve a loan for a friend or family member; do not consider or resolve a complaint of a family member or friend, or business associate. Conflict of interests covered by the Policy in relation to Senior Managers, or persons who occupy other 'responsible person' or 'risk identified' staff position, and all other staff, will be reported to the Chief Executive or Managing Director of the relevant **GoodLoop Group** company. The Chief Executive or Managing Director will maintain a record of the disclosure on the person's personnel file.

To reinforce the importance of the proper identification, reporting, and management of conflicts of interest covered by this Policy non-compliance with the relevant obligations is considered to be a serious breach of **GoodLoop Group** policy and may result in disciplinary action as permitted under the relevant **Group** policy.

Where appropriate, a person may use the Whistleblowing procedures to report a concern about a perceived conflict of interest.

6. Staff employment, Remuneration, Training and Monitoring

6.1. General Provisions

Key to the achievement of the strategic, financial and operational goals of the **GoodLoop Group**, and the fulfilment of the legislative and contractual obligations that apply to the **Group**, particularly associated with the **Franchise Agreement** with **Bendigo**, is the employment of competent employees who are of good fame and character. Subsequently, it is essential to ensure that all employees receive ongoing training, support and supervision, and that their activities are appropriately monitored.

6.2. Employment

GoodLoop Group companies will operate their recruitment practices to always seek the best person for the job and ensure the person is capable and competent to perform the functions of the position or will be competent after adequate training.

The **GoodLoop Group** supports the advancement of existing staff through internal promotion as part of well-developed and understood career pathways.

The regulatory obligations relevant to the employment of competent employees include, but are not limited to:

- Discharge of **SOFS's** responsibilities under its authorisation as an Australian Financial Services Representative or Australian Credit Representative to **Bendigo**;
- Avoidance of circumstances that could facilitate the commission of money laundering or financing of terrorism offences in connection with the provision of a designated service by **SOFS**, on behalf of **Bendigo**, as outlined and required under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act); and
- adherence to the fit and proper requirements under the Fit and Proper provisions of this Policy.

Adherence to these regulatory, contractual, and policy obligations requires both pre-employment checking and ongoing checking for continuing compliance with **GoodLoop Group** obligations and Policies. All applicants for a **GoodLoop Group** position must complete an 'Employee Employment Pack' which includes the information required to enable appropriate consideration of the person's suitability for the position being considered.

Applicants will be subject to a formal interview process and may be required to undertake testing to demonstrate verbal, abstract and numerical reasoning.

As the finalisation of the formal checking required through the onboarding process may take some time to complete, persons offered employment may commence under probation subject to the successful completion of the employment checking process.

6.3. Obligations to Bendigo

Employment of persons by **SOFS** who are to occupy a position that has customer contact within a **Bendigo Community Bank Branch** operated by **SOFS** can only occur with **Bendigo's** agreement. This requirement does not apply to those employees who were employed by **GoodLoop Mutual Ltd** (formerly SERVICE ONE) at the time of the migration of **GoodLoop Mutual Ltd** Members to the **Bendigo Community Bank** model. **Bendigo** has agreed to the employment of those employees by **SOFS**.

Bendigo may participate in the interview process for such employees. **Bendigo** will also undertake certain 'background' checks which might result in **Bendigo** indicating to **SOFS** that the person cannot be employed in a customer contact position.

The **GoodLoop Group** will ensure that it keeps **Bendigo** informed of the employment, movement, departure, or dismissal of all employees who are employed in a position that is covered by the requirements of the **Franchise Agreement** related to the operation of a **Bendigo Community Bank Branch**. This includes designated Branch Managers or employees who have customer contact within a **Bendigo Community Bank Branch** as part of their duties.

It will be a condition of all employment contracts for employees employed in a position relevant to the **Franchise Agreement** related to the operation of a **Bendigo Community Bank Branch** that the person's employment is subject to oversight and can be influenced by decisions taken by **Bendigo** related to their continuing fitness to occupy the relevant position.

A failure to provide any requested information in a timely manner, or where it is determined that the persons does not, or has ceased to comply, with the fit and proper requirements for that position then they will either not be offered the role or be removed from the role. In some cases, this might involve the termination of a person's employment with a **GoodLoop Group** company.

6.4. Staff Remuneration

Remuneration for non-executive staff will be based on the Enterprise Agreement that applies to employees of the **SOFS**, or entity for which the person is employed.

Remuneration for **GoodLoop Mutual Ltd** staff will be based on appropriate remuneration commensurate with the skills, experience and requirements of each individual role and incumbent. Employment will be on individual employment contracts and underpinned by the Banking, Finance and Insurance Award.

Employment terms and conditions will have the objective of ensuring that employees meet their fit and proper obligations under this Policy and their efforts are directed towards assisting the **GoodLoop Group** to achieve its strategic, financial, and operational objectives while maintaining the highest levels of ethical and corporate behaviour.

The Terms and Conditions, and employment, of employees, employed by **SOFS**, who have customer contact as part of their duties within the operation of a **Bendigo Community Bank Branch**, must be agreed by **Bendigo**, or be satisfactory, to **Bendigo**. This also includes any changes to terms and conditions and remuneration.

6.5. Training and Monitoring of Staff

Initial (induction) and ongoing training of employees is important in ensuring the **GOODLOOP Group** is able to achieve its strategic objectives as well as the fulfilment of its legal and regulatory obligation. This is a particularly important aspect of the requirements of the **Franchise Agreement** with **Bendigo** related to the operation of a number of **Bendigo Community Bank Branches**. Individual employee's training and development needs will be contained in individual development and performance appraisal plans which will be reviewed and updated on a yearly basis.

Additionally, **SOFS** will ensure that employees who are Authorised Representatives are aware of and comply with their responsibilities by:

- Ensuring that all employees with the responsibility to provide financial advice to clients, are kept well-informed about their responsibilities to comply with the relevant standards as set out by ASIC through providing adequate regular training;
- Conducting random spot compliance checks and audits;

- Ensuring that Managers are appropriately monitoring and supervising employees at the workplace level;
- Ensuring that all employees have a well formulated individual training and development plan; and
- Scheduling each employee for the appropriate FSRA compliance refresher training as required.

6.6. Supervision and Monitoring of Staff

The **GoodLoop Group** has legal and contractual obligations to ensure that all employees discharge their responsibilities professionally and ethically. This is particularly so in relation to **SOFS's** obligations to **Bendigo** under the **Franchise Agreement** to operate a number of **Bendigo Community Bank Branches**.

The purposes of the supervisory and monitoring regime is to enable the **GoodLoop Group** to be assured that:

- Employees understand, on a continuing basis, their responsibilities and duty of care as regulated persons, or when working for a regulated entity;
- Employees comply with all legal and regulatory requirements when performing their duties;
- That **GoodLoop Group** resources, and **Bendigo** resources, are used efficiently and effectively, and in a manner to mitigate any operational or Safety risks;
- Employees provide services in an efficient, honest, and fair manner; and
- Any gaps in an employee's skills and knowledge are identified early and appropriate remedial action is taken.

Monitoring of employees activities is part of the regular activities and work processes of all managers. This will include, but is not limited to:

- Regular reviews of employee performance;
- Exception reporting on completion rates of training and performance and competency reviews;
- Branch supervisions and call centre supervision;
- System and policy restrictions related to activities that are subject to heightened regulatory requirements;
- Independent review and retail audits by **SOFS** and **Bendigo** staff;
- Credit risk sampling reviews and hindsight reviews performed by **Bendigo** Credit Risk Management; and

- Hindsight reviews of third party credit contracts.

In addition to the above type of matters, performance and adequacy of training outcomes may also be detected by other activities undertaken by either SOFS or **Bendigo**, including, but not limited to:

- Customer feedback reporting and analysis;
- Reporting, analysis, monitoring and escalation of Risk Events and compliance breaches;
- Half-yearly risk declarations;
- Review of compliance plan survey results;
- Preparation of annual ACL and AFSL compliance certificates and external audits.

Some of these supervisory or surveillance processes may occur though electronic systems that record employees actions and interactions within the banking and support systems that are used in the operation of a **Bendigo Community Bank Branch**. These systems may be controlled and operated by **Bendigo**.

Where surveillance is undertaken electronically, the **GoodLoop Group** adheres to the requirements of the Workplace Surveillance Act 2005 (NSW). It is a requirement of that Act that employees are made aware of the circumstances in which action may be taken to restrict access to the internet, or cause or prevent the delivery of an email sent to or by an employee.

The surveillance of employees within the GoodLoop Group will occur on the following basis:

- It is a condition of giving employees' access to the intranet, email and Internet services, employees agree to the **GoodLoop Group**, or **Bendigo** where it is the provider of the service or equipment, conducting surveillance on employee's use of these services in accordance with procedures established under this Policy. This may involve the use of camera, computer or tracking devices to monitor employee's use of these services or any device provided for business purposes;
- The **GoodLoop Group**, or **Bendigo** in relation to a **Bendigo Community Bank Branch**, may install and operate camera surveillance devices in **Bendigo Community Bank Branches**, head office and other workplaces under the control of a **Group** entity, or **Bendigo**. This surveillance may be on a continuous, ongoing basis, and is considered to be primarily part of the operational risk

management system. The risks sought to be managed are the risk of injury to employees in the course of their employment and the risk of damage to or loss of the **GoodLoop Group** assets, **Bendigo** assets, or the assets of persons who use the services of a **GoodLoop Group** company.

- The **GoodLoop Group** will ensure that:
  - Where practical, all cameras will be clearly visible to employees;
  - Employees will be advised of the presence of cameras and other monitoring devices in the workplace; and
  - Premises will display adequate signage to ensure employees, clients, and members of the general public are advised and aware of the presence of cameras and other devices on the premises;
  - Any devices installed will not be in a staff change room or bathroom;
  - It does not engage in surveillance of employees outside the course of their employment unless the surveillance is computer surveillance of the use of an equipment asset or resource provided by either a **GoodLoop Group** company, or **Bendigo**, or the surveillance is lawful under some other legislation;
  - It does not undertake any covert surveillance of employees unless it is authorised by a covert surveillance authority; and
  - Any recording made or information obtained as a result of workplace surveillance is not used or disclosed unless it is for a legitimate purpose related to the employment of staff within the **Group** or the management of legitimate business risks or management activities or functions of the Group, or **Bendigo**. Disclosure may also occur to a member or officer of a law enforcement agency for use in the detection, investigation, or prosecution of an offence, or the taking of civil or criminal proceeding. Disclosure may occur when it is believed to be necessary to avert an imminent threat of serious violence to persons or of substantial damage to property.

Employees must not tamper with or otherwise do anything that affects the activities of a surveillance device which has been installed within a **GoodLoop Group** workplace. Employees do not have access to any recording or information obtained through surveillance without the permission of the Chief Executive of **GoodLoop Mutual Ltd**, or **Bendigo** if the information is **Bendigo's** information, unless it is part of their job description.

Identified non-compliance with a **GoodLoop Group** policy, or an applicable **Bendigo** Policy, or a requirement of the **Franchise Agreement** between **Bendigo** and **SOFS**, may result in, but is not limited to, the following actions:

- Increased levels of supervision and monitoring to enhance levels of compliance knowledge;
- Counselling and formal warnings where the breach, or breaches, are considered material or serious. This can also involve the termination of a person's employment within **SOFS** where **Bendigo** believes the person's actions has caused it harm; and
- For Credit Representatives and Authorised Representatives the termination of their specific authorisation, and the potential for a breach of the **Franchise Agreement** between **Bendigo** and **SOFS** which can lead to the cancelation of the right to operate **Bendigo Community Bank Branches**.

Performance management procedures for **SOFS** employees are contained in the relevant provisions of the **SOFS** Risk Management and Operations Policy.

7. Acceptable use of Technology

The acceptable use of information, information systems, and technology minimises risks to individuals and the **GoodLoop Group** and through it, **Bendigo**, and enhances outcomes against our Corporate Values.

All employees have a responsibility to contribute to and ensure the safety and security of **GoodLoop Group** information, and the information of **Bendigo** used in the operation of a **Bendigo Community Bank Branch**.

As part of that role employees will:

- Minimise security risks associated with the use and access to **GoodLoop Group**, or **Bendigo**, information, information systems and technology assets;
- Fully comply with the expectations contained in this Policy related to compliance with the Code of Conduct, and any Federal, State or Territory laws;
- Only communicate and collaborate with fellow employees, colleagues, customers and external stakeholders via the use of technology in a professional and courteous manner consistent with the values of **GoodLoop Mutual Ltd**, **SOFS**, and **Bendigo**;
- Adhere to all relevant information security policies, standards and controls;
- Not bypass or circumvent any information security controls;
- Not use any provided technology to access, download, forward, or transmit offensive or discriminatory material for any purpose, or use the technology to bully, harass or discriminate against another person or group;
- Not use any unauthorised cloud based file sharing system to store or transmit any **GoodLoop Group**, or **Bendigo**, information;
- Not access or scan any information or systems outside of an employee's designated role; or
- Not share passwords or system access.

Employees of **SOFS** can also refer to **Bendigo's** Acceptable Use of Technology Policy (and/or the Community Bank – Acceptable Use of Technology Policy) for further particulars concerning the proper use of technology issued to them, or available for use, within a **Bendigo Community Bank Branch** operated by **SOFS**. For **SOFS** employees, the Policies can be found on BENnet on the Policy Hub.

While information systems and technology are provided for business purposes, its use for limited and incidental personal use is permitted if it:

- Fully complies with this Policy, or any related policies or standards issued by **Bendigo**;
- Allows business activities to continue to occur unhindered;
- Is legal and conforms with regulatory and contractual obligations;
- Does not hinder employee productivity or result in increased costs to the **GoodLoop Group**, or **Bendigo**, in the operation of **Bendigo Community Bank Branches**;
- Does not involve activities associated with personal endeavours or business interests including for personal gain or profit; and
- Does not involve excessive activities associated with personal interests including fund-raising, crowd-funding, online shopping, or non-business-related organisations e.g. community endeavours such as volunteering.

8. Study Assistance

GoodLoop Group employees that are full time or part-time are eligible to apply for study assistance allowance or study leave.

Employees may be asked to complete a "Study Assistance" proposal which is to include an outline of the purpose of such study, cost and benefits anticipated and expected time commitments. Approval for any course of study will be required from the line-Manager of the employee and Chief Executive/Managing Director of their employing **Group** company before any study assistance can be provided.

In considering and giving initial approval for the course, the line-Manager must give due regard to the value of the course and its applicability to **GoodLoop Group's** operations and relevance to the employee's current or possible future roles within the **Group**. The line-Manager needs to then evaluate whether assistance should be provided and if so, to what degree. The following points should be taken into consideration when approving study assistance:

- The relevance of the course in relation to the employee's development needs;
- The performance and potential of the employee;
- The commitment of the employee to complete the program; and
- The overall estimated cost of the study assistance, if approved.

If there is any doubt as to the value of the course to the **GoodLoop Group** then this should be discussed with either the Chief Executive or Managing Director, as required.

As part of the approval process the employee must complete the Study Assistance Acknowledgement Form.

The maximum study assistance allowance is up to 50% of costs associated with the approved study. With 'costs' including all mandatory enrolment fees, course fees and the cost of one prescribed text per subject. The **GoodLoop Group** may pay any amount above the 50% maximum on the employee's behalf on the basis of the employee entering a binding agreement to repay the relevant amount through salary deduction. The payment of any assistance is subject to the successful completion of the enrolled in course.

Employees are not able to change any course approved for study assistance without the prior, expressed, approval of the **GoodLoop Group**.

The **GoodLoop Group** can, at its absolute discretion, seek the repayment of all, or some, of any payments made for an employee's course participation where the employee does not successfully complete one, or more, units.

The maximum period for which course participation will be assisted is 6 years.
For **SOFS** employees, any course undertaken through a person's myBEN u profile will be provided at no cost to the employee.

An employee's final pay will not be processed until any repayable funds under this Policy are received in full. The **GoodLoop Group** shall have the right to withhold moneys due to the employee as part of their final termination payment or use any legal means to recover such moneys.

8.1. Study Leave

A **GoodLoop Group** employee may, in additional to or separately from any study allowance approval, seek assistance in the form of study leave. The same criteria apply for this approval as apply to the approval of Study Assistance.

The maximum period of study leave is 5 days (or the equivalent period on a pro-rata basis for part-time employees) in each calendar year. Study leave can be taken as whole days or part days. Unless expressly approved, study leave will not be provided for the attendance at lectures. The amount of study leave granted will be determined by the Chief Executive or Managing Director of the relevant **GoodLoop Group** company.

9. Inclusion and Respect Policy

The Board of **GoodLoop** believes in the benefits of a diverse and inclusive workplace. Therefore, the principals of inclusion and being valued in a workplace will apply to the whole of the **GoodLoop Group**. This also supports the achievement of our strategic objectives and underpins the value propositions that we have adopted individually and collectively.

The **GoodLoop Group** is therefore committed to:

- Cultivating a culture of inclusion where employees' individual uniqueness is valued and respected so that they can be themselves without fear of harassment, bullying, or unlawful discrimination, regardless of their gender identity, sexual orientation, cultural identity, faith, disability, and/or age;
- Empowering employees to participate in decision-making processes and operations in a safe and supportive work environment;
- Creating fair and equitable opportunities for advancement and career development so that they can achieve their full potential, and be fairly compensated for their efforts;
- Fully meeting our legal, regulatory and contractual obligations regarding diversity and inclusion.

In support of these principles we will ensure that we:

- Have work processes and procedures that support equal employment opportunities;
- Facilitate career development opportunities, including access to learning and development programs based on a person's ability, performance, and potential;
- Have employment practices that ensure that our workforce reflects the communities in which we operate and are seen as fair, inclusive, flexible, and accessible. That we continue to invest in our people to foster a mindset that seeks diversity and guards against unconscious and conscious bias;
- Our workplaces are respectful and are free from bullying, harassment, and discrimination, with an accessible and meaningful complaints procedure;
- Have a performance management process that seeks to drive a greater focus on employee performance through collaboration, development and support;
- Have remuneration practices that are fair and equitable where people undertaking the same role receive the same remuneration and people undertaking different work which is of equal and comparable value are paid equitably;

- Support the development of a healthy and productive work life balance for our employees through reasonable flexible working arrangements in acknowledgement of the benefits for our employees, our businesses, and our customers and Members; and
- Will seek to understand the reasons why people leave our employment.

9.1. Anti-bullying, Harassment and Discrimination

The **GoodLoop Group** is committed to a workplace that is safe, respectful, and inclusive that is free from discrimination, harassment, bullying, sexual harassment and victimisation. It is the responsibility of all employees to contribute to a safe and respectful workplace and to speak up when seeing or experiencing discrimination, harassment, sexual harassment or victimisation in the workplace.
To achieve these outcomes the **GoodLoop Group** will:

- Create a safe, inclusive and respectful workplace where everyone feels they belong and which is free from any form of discrimination, harassment, bullying, sexual harassment, or victimisation;
- Foster an environment that supports those who speak out against any harassing or discriminatory conduct through functioning complaint management processes;
- Consider reasonable flexibility in employees working arrangements particularly in relation to the needs to assist with family responsibilities, disability, religious beliefs, cultural and other circumstances; and
- Ensure its employment practices and selection decisions are based on a person's skills, experience, and capabilities, and not irrelevant personal characteristics.

The **GoodLoop Group** expects all employees, but particularly senior employees, to contribute to the achievement of these objectives by:

- Being part of a safe work environment that treats all colleagues, customers, and others with dignity and respect;
- Modelling behaviours that are in line with our Values and Code of Conduct;
- Being prepared to speak up when you see unacceptable behaviour, and do not participate in gossip or inappropriate behaviour of any means, and support those who do speak up against unacceptable behaviour;
- Not victimising anyone who may have spoken up against unacceptable behaviour; and

- Respect processes of complaint handling and not divulge any confidential information that they receive as part of any such process.

Conduct that constitutes discrimination, harassment, bullying, sexual harassment, or victimisation is unacceptable in a **GoodLoop Group** workplace and is unlawful under Federal, State and Territory legislation. Motive or intention is irrelevant as to whether an offence has been committed. A single incident is enough to constitute discrimination, harassment, or sexual harassment – it does not have to be repeated.

9.2. Discrimination

Unlawful discrimination is treating, or proposing to treat, someone unfavourably or less favourably because of a personal characteristic protected by law such a sex, gender identity, age, race or disability. Unlawful discrimination can be direct or indirect.

Direct discrimination is when a person or group is treated unfavourably or less favourably than another person or group in a similar situation because of a personal characteristic protected by law.

Indirect discrimination is when an unreasonable requirement, condition, or practice, is imposed that has, or is likely to have, the effect of disadvantaging people with a personal characteristic protected by law.

These personal characteristics include (the following characteristics or an assumption that a person may have one at some time in the future):

- Disability, disease or injury, including work related injury;
- Family responsibilities, for example caring for children or other family members;
- Race, colour, descent, national origin, or ethnic background;
- Age, whether young or old or because of age in general;
- Sex;
- Industrial activity;
- Religion (including religious appearance or dress);
- Pregnancy, including potential pregnancy or breastfeeding or association with a child;
- Sexual orientation, sexuality, intersex status or gender identity, including gay, lesbian, bisexual, transgender, queer, and heterosexual, gender history, or chosen gender;

- Physical features;
- Social origin;
- Marital status, domestic or relationship status, whether married, divorced, unmarried, or in a defacto relationship or same sex relationship or the gender identity of a spouse or partner;
- Medical record (in some circumstances);
- Being subjected or having been subjected to domestic violence; and
- An association with someone who has, or is assumed to have, one of these characteristics, such as being the parent of a child with a disability.

9.3. Harassment

Harassment is any behaviour that makes a person feel intimidated, insulted, or humiliated because of their race, colour, national or ethnic origin, sex, disability, sexual orientation, gender identity, age, or some other characteristic specified under anti-discrimination or human rights legislation.

Harassment can be physical, verbal, or written.

9.4. Sexual Harassment or Harassment on the Grounds of Sex

Sexual harassment is a specific and serious form of harassment. It is unwelcome behaviour of a sexual nature which could reasonably be expected to make a person feel offended, humiliated, or intimidated. Sexual harassment is unacceptable in the workplace and is against the law.

It can include:

- Comments about a person's private life or the way they look;
- Sexually suggestive behaviour, such as leering or staring;
- Brushing up against someone, touching, fondling or hugging;
- Sexually suggestive comments or jokes;
- Displaying offensive screen savers, photos, calendars or objects;
- Repeated unwanted requests to go out;
- Requests for sex;
- Sexually explicit posts on social networking sites;
- Insults or taunts of a sexual nature;Intrusive questions or statements about a person's private life;
- Sending sexually explicit emails or text messages;
- Inappropriate advances on social networking sites;
- Accessing sexually explicit internet sites;

- Behaviour that may also be considered to be an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.

Just because someone does not object to inappropriate behaviour in the workplace at the time, it does not mean that they are consenting to the behaviour.

Sexual harassment can be physical, verbal, or written.

Harassment on the ground of sex (or “sex-based harassment”) occurs, where a person is harassed by reason of:

- their sex; or
- a characteristic that appertains generally to persons of their sex; or
- a characteristic that is generally imputed to persons of their sex.

Harassment in this context means any unwelcome conduct of a demeaning nature by reason of the person's sex in circumstances in which a reasonable person would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

Harassment on the grounds of someone’s sex does not need to be sexual in nature to be unlawful. For example, harassment that is on the grounds of sex may include sexist remarks, which, for example, imply that certain tasks are strictly ‘men’s work’ or ‘women’s work’.

Sexual harassment and harassment on the ground of sex occurs in the workplace when it happens at work, at work-related events, between people sharing the same workplace, or between colleagues outside of work.

A single incident is enough to constitute sexual harassment or harassment on the ground of sex – it doesn’t have to be repeated.

The **GOODLOOP group** recognises that comments and behaviour that do not offend one person can offend another. This policy requires all staff and volunteers to respect other people’s limits.

Any form of sexual harassment or harassment on the ground of sex, in the workplace or in any work-related context such as conferences, work functions and business trips will not be tolerated.

9.5. Bullying

Workplace bullying has a detrimental effect on **GoodLoop** and its people. It can create an unsafe working environment, result in a loss of trained and talented workers, cause the breakdown of teams and individual relationships, increase absenteeism and reduce efficiency and productivity. Bullying will not be tolerated by any employee of the **GoodLoop group**.

The Company recognises that workplace bullying may involve comments and behaviours that offend some people and not others. **GoodLoop** accepts that individuals may react differently to certain comments and behaviour. That is why a minimum standard of behaviour is required of workers. This standard aims to be respectful of all workers.

The Company recognises that workplace bullying can take place through a number of different methods of communication including face to face, email, text messaging and social media platforms.

Workplace bullying occurs when an individual, or a group of individuals, repeatedly behaves unreasonably towards a worker, or a group of workers, and the behaviour creates a risk to health and safety. It includes both physical and psychological abuse.

Bullying behaviours can take many different forms, from the obvious (direct) to the more subtle (indirect).

The following are some examples of direct bullying:

- Abusive, insulting or offensive language or comments;
- Violent, aggressive or intimidating conduct;
- Belittling or humiliating comments;
- Victimisation; and
- Practical jokes or initiation.

The following are some examples of indirect bullying:

- Unjustified criticism or complaints;
- Deliberately excluding someone from work-related activities;
- Withholding information that is vital for effective work performance;
- Setting unreasonable timelines or constantly changing deadlines;

- Setting tasks that are unreasonably below or beyond a person's skill level;
- Denying access to information, supervision, consultation or resources to the detriment of the worker;
- Spreading misinformation or malicious rumours; and
- Changing work arrangements such as rosters and leave to deliberately inconvenience a particular worker or workers.

The above examples are not an exhaustive list of bullying behaviours. They are indicative of the type of behaviours that may constitute bullying and are therefore unacceptable. If you are unsure whether behaviour not provided on this list constitutes bullying you should contact your direct supervisor in the first instance.

Reasonable management action taken by managers or supervisors to direct and control the way work is carried out is not considered to be workplace bullying, if the action is taken in a reasonable and lawful way.

9.6. Victimisation

Victimisation is subjecting or threatening to subject someone to a detriment because they have:

- Spoken out against and called out unacceptable behaviour;
- Raised concern or made compliant about a matter covered by this Policy;
- Helped another person raise a concern or complaint; or
- Refused to do something because it would be discrimination, harassment, sexual harassment, or victimisation.\

It is also victimisation to threaten a person who has witnessed discrimination, harassment, or sexual harassment, or to threaten a person who may be involved with investigating a concern or complaint of discrimination, harassment, sexual harassment, or victimisation.

The taking of reasonable disciplinary action against an employee is permitted under this Policy.

9.7. Consequences for Breaching of this Policy

An employee, regardless of their position, who is found to have engaged in workplace discrimination, harassment, sexual harassment, or victimisation will be held to account and disciplinary outcomes will apply, including but not limited to counselling, training, warning action, dismissal or termination of employment or a contract arrangement.

9.8. Support for Staff

To ensure people who are subject to, or witness, workplace discrimination, harassment, sexual harassment, or victimisation are supported, the **GoodLoop Group** will provide free access to professional counselling through an outsourced Employee Assistance Program. Counselling is confidential and none of the discussion held are disclosed to anyone in the **GoodLoop Group**, or **Bendigo**.

10. Staff Leave Standards

Bendigo requires all employees of **SOFS** who are involved in the operation of a **Bendigo Community Bank Branch** to take at least 10 days of consecutive leave every 12 months. **Bendigo's** 10 Consecutive Days Leave Standard is adopted by **SOFS**. It can be found on BENnet in the Policy Hub.

11. Employee Travel and Accommodation

All travel and/or accommodation while working away from the employee's home for which the employee seeks reimbursement, or for which their **Group** employee is to pay, must be approved, in advance, by a Senior Manager in the **Group** company.

This section does not apply to Directors of **Group** companies whose travel approval and reimbursement arrangements are contained in the **GoodLoop** Board and Committee Policy.

The approval must cover the location of the travel, the dates the employee will be away, whether the employee is seeking to take a short period of leave in conjunction with the travel, the means of transport and where the employee will be staying.

Any costs that are not directly related to the employees travel, for instance where a partner may be travelling with the employee, are the employees only and can-not be reimbursed or charged to a **Group** company. Employees should note there are circumstances where they may personally incur a potential for FBT, or other taxes due to private benefits being accrued while travelling. They may also need to take their own travel insurance where activities or circumstances render them outside of any insurance coverage that is otherwise provided under a **Group** insurance policy.

Transport can be by either air travel or motor vehicle, whichever is the most effective and efficient. Air travel will be in economy class, unless specifically approved by the Chief Executive or Managing Director, where the length of travel warrants a higher class.

Travel by motor vehicle can be either in a **GoodLoop Group** vehicle, in which case the costs are met by the relevant **Group** company, or by the employee's private vehicle. Where approval is obtained to use their own vehicle the distance of travel will be reimbursed on the per kilometre rate method, subject to the completion of Private Motor Vehicle Usage Application Form.

The charging of expenses directly to a **Group** issued Credit or Debit Card, or the submission of a claim for reimbursement, can only occur in relation to the following expenses:

- The direct costs of travel or accommodation (accommodation is to be in a standard room in a 3 or 4 star facility, unless at a conference venue where the rating does not apply);
- Meals (including reasonable beverage costs); and
- Costs of reasonable contact with the employee's family.

All charges to a **Group** Credit or Debit Card, or requests for reimbursement must be accompanied by a tax invoice or receipt. If the amount being charged or claimed is below $50.00 an invoice or receipt is not mandatory (but should be obtained where possible), but a diary note covering the expense must be maintained. If the employee does not have any supporting documentation then a charge or claim can be supported by the submission of a Statutory Declaration.

No payments will be made in excess of actually incurred expenses.

12. Benefits and Gifts

The receipt of benefits or gifts can give rise to issues of conflict of interest or allegations of bribery or corruption. All employees need to ensure that any gifts or benefits they receive, or are offered by a third party, in the course of their employment accord with their obligations under the Conflict of interest provisions of this Policy and are otherwise in accordance with, and do not give rise to any issues related to, the values of **GoodLoop Mutual Ltd** or **SOFS**. **Bendigo** has a Gifts and Entertainment policy which is also applicable to, and adopted for, the circumstances of employees of **SOFS** as it applies to representatives of **Bendigo**. It can be found on BENnet in the Policy Hub.

For the purposes of this Policy a gift or a benefit does not include:

- Any gift with a retail value of less than $50.00;
- Any discount which is reasonable and generally available; and
- Any meal or related hospitality at a function where the employee is representing a **Group** company.

All gifts or benefits otherwise caught by this Policy, or the relevant **Bendigo** policy, must be declared and recorded in the appropriate gifts and benefits register. Where the gift or benefit is provided to a Director it must be reported at the next Board meeting.

13. Corporate Motor Vehicle Policy

Introduction
Where the **GoodLoop Group** has purchased a corporate vehicle for the use of employees, or has agreed to an employee packaging a vehicle as part of their employment arrangements, which is for the purposes of this Policy considered to be a corporate vehicle, the following will apply.

The type of vehicle purchased, the replacement period, and the arrangements for disposal, for vehicles covered by the above Policy is at the discretion of the **GoodLoop Group**.

A corporate vehicle is predominately provided for business use by the authorised driver, or other employees in regular business hours. However, authorised drivers who are custodians of the vehicle, and their partner or spouse, are entitled to unrestricted but responsible private use.

Eligibility

The assignment of a corporate vehicle to an employee must be approved by the Chief Executive or Managing Director.

Eligibility for a corporate vehicle will be determined based on the requirements of the employee's role. Roles that involve significant travel for business purposes—such as Business Development Managers (BDMs), Mobile Relationship Managers (MRMs), and similar positions—may be considered eligible where the role necessitates a minimum of 10,000 business kilometres of travel per annum.

Employees will only be considered for a corporate vehicle if they can fulfill certain conditions:

- They must have a full and valid driving licence
- Declare demerit points (represent a risk management issue)
- Declare any health-related issues that may prevent them from driving safely
- Agree to adhere to motor vehicle policy, specifically in terms of taking responsibility for their vehicle and behaviour behind the wheel.

Personal Use
Employees qualifying for a corporate vehicle will not be required to make a personal contribution towards the running costs of the vehicle and are entitled to personal use

but within reason. To take the corporate vehicle interstate for more than 100km for personal use, pre-approval will be required.

Logbooks

Employees are requirement to submit a continuous 12-week logbook within the FBT year starting on 1 April each year.

Corporate Cards

Staff with allocated corporate vehicles will be issued with a corporate card which can be used to purchase fuel and for maintenance of the corporate vehicle.

Returning the Vehicle

An employee will be required to return the corporate vehicle in the following circumstances:

- The employee resigns or their employment is terminated.
- The employee loses their drivers licence or is suspended from driving for a set amount of time.
- The employee takes leave of greater than eight weeks duration (this includes annual leave and/or sick leave)
- The vehicle has been involved in an accident that causes the car to be unfit for safe driving.
- When an employee is injured or deemed unfit to operate a motor vehicle.
- When an employee refuses to follow this policy or wilfully ignores it.
- When an employee shows negligence over vehicle upkeep and maintenance.

The corporate vehicle is required to be returned in a clean condition.

Driver Responsibilities

The driver of the vehicle must be the holder of a current driver's licence.
The employee responsible for the vehicle must make sure that the vehicle is always kept in as safe and secure a place as possible.

Private use of a corporate vehicle is only extended to the employee or the employee's immediate family members.

Infringement notices and parking fines are to be paid by the driver of the vehicle.

Keeping the vehicle in good condition

The employee responsible for the vehicle must ensure that:

- The vehicle is maintained in a clean condition inside and out.
- All manufacturers servicing is carried out.
- Corporate vehicles are not to be used to tow any trailer, caravan or boat which is too large and/or too heavy for the vehicle.

14. Uniforms and Appearance

All employees of **SOFS** are required to wear a uniform provided by **Bendigo**. If an employee wishes to have items in addition to the allocation made by **SOFS** they can purchase additional items through **SOFS** at their own cost.

Bendigo has issued Guidelines for the wearing of corporate uniforms. Those Guidelines are adopted for **SOFS** and apply to the wearing of any **Bendigo** uniform by an employee of **SOFS**. For **SOFS** employees, the guidelines can be found on BENnet by searching 'Uniforms'.

The **GoodLoop Group** expects that all staff will, when undertaking duties on behalf of a **GoodLoop Group** company, maintain a professional appearance and image. It is not the **Group's** intent to specifically indicate what aspects of a person's appearance does not accord with the intent of this Policy. However, an employee's manager may discuss issues to do with an employee's appearance and their adherence to the uniform guidelines as part of general work performance discussions.

15. Whistleblowing Policy

As part of the suite of policies and procedures that **Bendigo** recommends or mandates for entities that operate a **Bendigo Community Bank Branch** a Whistleblowing Policy, and **Bendigo's** Whistleblowing Policy specifically, is noted as being mandatory.

The Board of **GoodLoop** therefore adopts **Bendigo's** Whistleblowing Policy for the **GoodLoop Group**. For **SOFS** employees, the current version of the Policy can be found on the BENnet on the Policy Hub.

In reading the Policy, **GoodLoop Group** employees should replace references to **Bendigo**, or the **Bendigo Group**, with **GoodLoop Mutual Ltd**, or the **GoodLoop Group**, or the entity within the **Group** that the person is employed by. It should be noted, however, that a **SOFS** employee can, if they so wish, use the **Bendigo** Whistleblowing Policy and processes to report any whistleblowing concerns instead of using the Policy as amended by these provisions.

Any references to an employee workplace complaint process will be read as a reference to the applicable process for **GoodLoop Group** employees. Similarly, any disciplinary action will be action undertaken under the relevant **GoodLoop Group** policy.

However, it should be noted that **Bendigo** has the right to make an adverse finding about an employee within a **Bendigo Community Bank Branch** conducted by **SOFS**, and seek action to be taken against that employee. This could include, in some cases, the termination of the person's employment.

The Whistleblower Officer for the **GoodLoop Group** is **GOODLOOP's** External Auditors.

The Whistleblower Review Committee for the **GoodLoop Group** will be Management, Strategy and Risk Committee established under the auspices of the **SOFS** Board.

16. Grievance Handling Policy

At **GoodLoop** we aim to foster good relations amongst employees and between employees and management. We acknowledge that the enjoyment you experience in your job is reflected in how well you work and how well you relate to your colleagues and customers.

We also acknowledge that problems can arise at work that may sometimes cause you to feel aggrieved. These problems can sometimes arise from the behaviour or decisions of management or other employees.

The purpose of this policy is to allow you to have such problems, referred to as grievances, addressed internally in a timely and confidential manner.

A grievance can be about anything done, or not done, by management or another employee or employees, which you feel affects you unfairly or unjustly. A grievance can also be about discrimination, harassment, bullying or any other employment related decision or behaviour that you think is unfair, unjust or upsetting.

This Grievance Handling Policy outlines the procedures you should follow to try to resolve a grievance and also outlines the steps **GoodLoop** will take to resolve your grievance if you make a formal complaint.

16.1 What Are Your Options If You Have a Grievance?

In general, there are three options to consider if you have a grievance, being:

- **Deal with the matter informally**. A grievance can be dealt with informally by approaching the involved in your grievance, if you feel comfortable in doing so. You can tell them that their behaviour, decision, actions, etc. was unfair, offensive, discriminatory etc., and why you believe this to be so. The person may have been totally unaware of the effect of their behaviour or decision on you. By telling them you will give them a chance to redress the situation. This may not be appropriate in some cases, particularly if you do not feel comfortable speaking to the person.

- **Speak to your manager or other senior person**. If you do not want to speak to the person directly, you can tell your manager about your grievance. They should be able to tell you what your options are. They may approach the person complained about and talk to them informally about your grievance. They may decide to take more formal action. Generally, they will seek your approval before doing anything – although sometimes they may decide that taking action will be necessary even if you do not wish them to do so (for example where failure to do so poses a health and safety risk). If your grievance is about your manager, you may wish to speak to another senior person. Alternatively, you may decide to make a formal complaint.

- **Make a formal complaint**. If you do decide to make a formal complaint, this can be done by putting the complaint in writing and reporting it to your manager (or other senior person). The written complaint should contain a description of the incident(s), decision, behaviour in question, the time and date of the incident(s), the names of any witnesses, your signature and date of the complaint.

16.2. If you make a Formal Complaint how will your Grievance be handled?

Grievances will be handled in accordance with the following guidelines:

- Grievances will be treated with the utmost confidentiality (except where the Company deems it is necessary to disclose the complaint for the purpose of dealing with it effectively; disclosure will be no wider than is strictly necessary). It is important that you also maintain confidentiality and do not discuss your complaint with others, unless the Company gives you permission to do so;

- Any grievance will be taken seriously, handled impartially, and any steps taken will be in accordance with the principles of procedural fairness;

- Employees who raise grievances are protected from victimisation;

- Grievances will be dealt with promptly, taking into account all the circumstances; and

- Generally, you may have a support person with you at any stage of the process.

16.3. The Investigation

Where a grievance cannot be resolved informally, and GoodLoop deems an investigation is required, the matter will be investigated by such appropriate person as GoodLoop deems appropriate. This may be an external investigation.
How the investigation is to be conducted is at the complete discretion of GoodLoop. The following are general guidelines only.

During the investigation, you will generally be interviewed first, following which any witnesses, the person against whom the complaint is made, and any other relevant people will be independently interviewed. Both you and the person against whom the complaint is made will generally be allowed to have a support person present when the interview is being conducted.

- If the complaint is substantiated, appropriate action will be taken (see below);
- If the complaint is unsubstantiated, you will generally be given an explanation as to why that finding was made;
- If the complaint is found to have been fabricated or vexatious, appropriate disciplinary action may be taken against you up to and including termination of employment.

16.4. What are the possible outcomes?

If the investigation reveals that your complaint is valid, several actions may be taken, depending on the nature of the complaint. The person against whom the complaint is made may be asked to give you a written apology, he/she may be given a written warning, counselling, transfer, demotion, or may be subjected to disciplinary action up to and including termination of employment.

If the investigation is inconclusive, i.e. the complaint cannot be proved due to lack of evidence or the conduct is not sufficiently serious to justify disciplinary action, the Company may nevertheless take a number of actions. These may include training and/or monitoring of relevant staff.

If the complaint is found to have been completely fabricated or raised vexatiously, appropriate action may be taken against you in accordance with the Disciplinary and Termination Policy including counselling, an official formal warning, transfer, demotion, or disciplinary action up to and including termination of employment, depending on the seriousness of the circumstances.

16.5. What if you are not satisfied with the outcome

If you are not satisfied with the way in which your grievance was handled, you may have the option of raising your complaint with an outside agency, such as the Australian Human Rights Commission the Fair Work Ombudsman or the relevant State Anti-Discrimination Board and other bodies. You may also wish to consider making a claim in the Fair Work Commission or the court. In appropriate circumstances you may wish to seek advice from a union or lawyer.

17. Privacy Policy (Employment)

GoodLoop is committed to protecting the privacy of its employees and meeting any privacy obligations set out in the Privacy Act 1988 (Cth) ('the Privacy Act') that might apply to it. The Privacy Act generally only applies to an organisation that has an annual turnover of more than $3 million. Any organisation covered by the Privacy Act must have a privacy policy in place which deals with the collection and use of individuals' personal information.

GoodLoop collects personal information in order to conduct its business and comply with a range of legislative requirements.
The purpose of this policy is to explain how **GoodLoop** handles personal information of those who work with and for the group of companies, and for job applicants.

We may also have a separate privacy policy that deals with the collection and use of personal information from clients, customers, etc.

17.1. Personal Information

Personal information is information relating to an individual which personally identifies an individual or makes the person's identity reasonably apparent.

Personal information may also include 'sensitive information'. Sensitive information is information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences, criminal record, health and biometric information or similar such information.

Sensitive information may be required to be collected in some circumstances. the Company will only collect sensitive information if it is necessary for business purposes. The Company will generally only collect sensitive information with your consent (unless otherwise permitted or required by law).

All information collected will be used and disclosed by the Company only in accordance with this policy and the law. The Company will take reasonable steps to ensure that all personal information is held securely.

17.2. Collection of Personal Information

GoodLoop Mutual Ltd ("**GoodLoop**") will only collect personal information from individuals if it is reasonably necessary for the Company's functions or activities.

17.3. Information provided by an individual

It is the Company's usual practice to collect personal information from those who work with and for **GoodLoop**. In addition, as part of the recruitment process, the Company may obtain information directly from a candidate as a result of their application to a job advertisement.

Furthermore, if a candidate's application is successful, as a condition of employment with **GoodLoop**, the successful candidate will likely be asked to provide evidence of their identity and legal entitlement to work in Australia. It is likely a successful candidate will also be asked to provide personal information, such as emergency contact details, tax file number, superannuation and bank account details, which will form part of an employee file.

Specifically, **GoodLoop** may collect personal information directly from an individual including:

- recruitment and on-boarding information such as an application form and resume,
- emergency contact details, and details of previous employment;
- contact details, including address, email address and phone number;
- date of birth;
- details of next of kin and emergency contact details;
- gender;
- identification documents including passport and drivers' licence;
- marital status and family details, including in relation to personal leave;
- bank details (including bank name and location, BSB and account number) and
- information in relation to tax status; and
- details of share and option plans.

17.4. Information provided by a third-party

As part of the recruitment process, where relevant, and with the candidate's consent, **GoodLoop** may seek information about a candidate through a third-party such as a recruitment service provider or a former employer. With the candidate's consent, **GoodLoop** may also seek information regarding:

- prior employment history through reference checks;
- eligibility to work in Australia through a visa status check;
- educational qualifications by requesting confirmation of qualifications or results from an academic institution;
- interview records and details of any pre-employment assessments, including aptitude or other psychometric testing; and
- ability to perform the inherent requirements of the role, through medical and other allied health professionals, or criminal history check and/or working with children check.

GoodLoop may also access personal information through publicly available networking sites such as Facebook or LinkedIn.

17.5. Information Collected During the Course of Employment

GoodLoop may also collect information about an individual and their work over the course of their employment, (or for contractors during the performance of a contract with the Company).

Such information may include:

- details of any contract of employment (or contract for services) including start and end dates, department, role and location, reporting lines, title (including details of previous titles), working days and hours, details of promotions, details of bonuses, remuneration and salary (including details of previous remuneration), benefits and entitlements;
- any information relating to disciplinary or grievance investigations and proceedings, including any warnings and related correspondence;
- information relating to performance and behaviour at work, including appraisals, ratings, performance reviews, objectives, goals, and performance improvement plans;
- details of attendance at work and absences, including annual and personal leave;
- training records including training needs;
- details of any expenses claimed; and

- details of the use of Company property and equipment (including computers, swipe cards and telephone systems), emails and software.

GoodLoop may also collect other personal information if required or authorised to do so by law.

17.6. Use of Personal Information

The purposes for which the Company may collect, use, and disclose personal information include (but are not limited):

- to establish, maintain and manage relationships, including to serve functions such as recruitment, payroll, appraisals, and any disciplinary action (including any termination of any employment or engagement) and managing employees' work and any claim in relation to any injuries or illnesses;
- to assess or respond to claims, complaints, or conduct, or co-operate with investigations when required;
- to obtain professional services as required including legal, human resources, industrial relations, accounting and insurance services;
- work-related administrative purposes;
- to finalise the terms of a contract, including pay rates;
- to confirm eligibility to work in Australia;
- to carry out a contract including, where relevant, its termination;
- to pay and provide other benefits in accordance with a contract;
- to make travel bookings on an individual's behalf;
- to allow you access to the Company's buildings, and to ensure the security of Company
- buildings, confidential information and other Company property;
- to reimburse expenses claimed;
- to operate any share scheme including the granting of share options;
- to operate schemes relating to sick leave, maternity leave, paternity leave, adoption leave, and parental leave;
- deducting and paying appropriate tax and superannuation contributions;
- to monitor and protect workplace health and safety;
- to provide a reference upon request from another employer;
- monitoring compliance with Company policies and The Company's contractual obligations;
- to comply with all applicable law;
- to liaise with any insurers in respect of any insurance policies that relate to you;
- running the Company business and planning for the future;

- the prevention and detection of fraud or other criminal offences;
- to defend the Company in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure;
- otherwise as permitted or required by law; or
- otherwise with your consent.

17.7. Use of your Personal Information on the Company Website, for Marketing Purposes Etc.

GoodLoop may use your personal information (for example, your name, image, job title and work contact details) on its website or in other publicly available resources where this is necessary for legitimate business purposes.

GoodLoop may also use this personal information for other marketing purposes, such as for displaying photos of staff on its website and in other marketing materials. In some circumstances it will be necessary to continue to use certain personal information (such as photos of you) on the Company website or in other marketing materials even after your employment has come to an end.

GoodLoop will always only use such personal information in a reasonable manner, considering your position within the Company and the nature of your role. If you have any concerns about such use of your personal information, you should discuss this with your manager.

GoodLoop will consider any such points raised.

17.8. Disclosure of Personal Information

The Company may disclose personal information to third parties including:

- other companies within the Company's group;
- employees and contractors working for the Company, to the extent this is necessary for the operation of the Company's business;
- technology service providers, including, internet service providers, cloud hosting service providers, software suppliers, maintenance and support service providers, and security services on a confidential basis so that they can provide services to the Company;
- service providers such as banks;
- external consultants such as legal, human resources, industrial relations, accounting, and insurance;
- travel agents and suppliers of accommodation and travel services;

- government agencies such as the ATO, Fair Work Ombudsman, WorkCover, etc;
- superannuation funds;
- to other third parties as allowed by law or with your consent.

17.9. Accuracy and Storage of Personal Information

The Company will always endeavour to maintain an accurate record of all personal information it holds. Individuals should ensure that all personal information provided to the Company is accurate and up to date and notify the Company of any changes where required.

In addition, in order to ensure personal information is handled appropriately, individuals should:

- only access personal data if they need to do so for the proper performance of their role;
- not share personal data unless this is necessary for the proper performance of their role;
- keep personal data secure and protected;
- regularly review and update personal data as necessary;
- not make unnecessary copies of personal data and keep and dispose of any copies securely;
- consider using strong passwords and when protecting documents with personal data on them;
- lock unattended computer screens and devices;
- never leave computers, devices, electronic storage systems, files, paperwork or other things containing personal data in a manner that risks there unauthorised access or theft;
- where appropriate, ensure that highly sensitive personal data is encrypted before being transferred electronically to authorised external contacts. Where necessary, please speak to your manager or the IT department for more information on how to do this;
- consider anonymising data or using separate keys/codes so that the data subject cannot be identified;
- not save personal data to personal computers or other devices;
- not take personal data away from Company's premises unless required to do so for the proper performance of your role;
- shred and/or securely dispose of personal data when finished with;

- ask for help from your manger if unsure about data protection, or if any areas of data
- protection or security can be improved; and
- immediately report any loss, unauthorised access, security risk or other issue that arises in respect of personal information to your manager.

Personal information held by **GoodLoop** in respect of employees is subject to the "employee records exemption" under the Privacy Act and does not have to be disclosed on request.

Other persons, such as job applicants can request copies of their personal information by contacting the Chief Executive Officer (CEO). **GoodLoop** may make reasonable charges for access to personal information and may refuse to provide access to, or delete, information where this is required or authorised by the Privacy Act or another law.

If personal information is incorrect, individuals may request that the Company amend its records and **GoodLoop** will take reasonable steps to do so. Employees can do this by contacting their manager, other persons, such as job applicants should use the contact details referred to above.

17.10. Raising a Concern or a Complaint

If you have any concerns about the use of your personal information (or of any other person's personal information) you should discuss this with your manager. Other persons, such as job applicants should use the contact details provided in their job application or contact the CEO.

The Company will generally ask for your concern or complaint to be put in writing, and it will endeavour to provide a reply within 21 days.