



# Code of Conduct

JULY 2025



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Artwork: Troy Firebrace, Yorta Yorta and Dja Dja Wurrung artist and educator.

## Acknowledgement of Country

Bendigo Bank acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation and the Traditional Custodians of the land where we live, learn and work. We pay our respects to Elders past and present as it is their knowledge and experience that holds the key to the success of future generations.

# Messages from our Chair and Managing Director

Our aspiration is to be Australia's most innovative bank, and our purpose is to feed into the prosperity of our customers and communities.

To achieve this, our Code of Conduct sets the expectations for the behaviours, actions, and decisions we should all be demonstrating to ensure we can continue to deliver on our strategy.

The Code ensures we comply with relevant laws and regulations and outlines our people's obligations both to themselves and each other as well as our customers, partners, and the community.

We have a strong reputation and are proud of the trust we've earned. Together, we must maintain that trust through our collective focus on how we conduct ourselves and by strengthening our risk culture.



**Vicki Carter.**  
Chair,  
Bendigo Bank.

Our Code of Conduct sets the expectations for all of us around the way we work and interact with our customers, communities, and each other to deliver the best possible outcomes for all.

With a focus on consistently demonstrating shared values, behaviours, and guidelines to support our risk management capabilities and culture, the Code helps to guide us and set us up for success.

Our reputation as a trusted bank and our commitment to our customers and communities are foundations of our business. We all have a role to play as individuals to speak up when something isn't right and foster a culture where this is supported. I commit to always holding myself accountable to the expectations outlined in the Code and I ask you to do the same. Together we will move a step closer to our aspiration of being Australia's most innovative bank.



**Richard Fennell.**  
CEO and Managing Director,  
Bendigo Bank.



# The Purpose of our Code of Conduct

Our Code of Conduct (Code) sets the standard for our corporate and individual behaviours, actions, and decisions.

The Code, together with our Values, guides our understanding of what is expected every day to support the delivery of the right outcomes for customers, community, each other, stakeholders, and our business.

Our Code applies to every single one of us, including directors, employees, contractors, consultants, and any other person performing work on behalf of or engaged to represent Bendigo and Adelaide Bank Limited and its controlled entities (the Group) and Community Bank companies. The Group and Community Bank companies are collectively referred to throughout our Code as 'the Bank'.



# How our Code applies to you.

Our Code helps you put into practice:

- Living our Purpose, Values and Behaviours
- Applying good judgement when making decisions
- Speaking up with a good idea, if you have made a mistake or seen or experienced something you don't think is right.
- Finding the right way to:
  - Help our customers and community
  - Ensure respect and safety of people
  - Strengthen risk and governance
- Complying with laws, regulations, prudential standards, and the Bank's policies, standards, processes and procedures.

The Code applies to you at all times when you are representing the Bank, including when working onsite, remotely, at work-related functions, and when travelling for work.

You have a responsibility to read, understand, and meet the standards set out in our Code. Compliance with our Code is a condition of your employment or engagement with the Bank.

Role modelling the standards in our Code and embodying our Values will support you always doing the right thing to make a difference and deliver the best possible outcomes for our customers, communities, each other, stakeholders and the Bank.

Failure to comply with our Code will result in a fair, proportionate and appropriate disciplinary outcome in line with the Bank's [Consequence Management Policy](#) (and Franchise Agreement for Community Bank companies). This may include additional training, verbal or written warning, impact to remuneration, or termination of employment.



# Our Aspiration, Purpose and Values

## Our Why:

The core reason why we come to work every day and the guiding direction for our organisation

## Our How:

The way we always go about our work and interact with our customers, community and each other

## Our Aspiration

To be Australia's most innovative bank

## Our Purpose

To feed into the prosperity of our customers and communities

## Our Values



### Make a difference

We create a positive impact for our customers, communities, shareholders and each other, we genuinely care.



### Be better together

We are empowered, we speak up, and together we continuously improve, learn and grow.



### Own it

We take initiative and commit to our decisions to deliver better outcomes.



### Find the right way

We make balanced decisions by considering the risk and reward of any given situation and a diverse range of perspectives.

# Applying good judgement

Sometimes the best course of action is to stop and ask 'should I do this?'

Exercising good judgement helps to ensure we are making ethical decisions to support the delivery of fair and balanced outcomes for our customers, community, shareholders, each other, and the Bank.

Good judgement requires us to make balanced and informed decisions by thinking before acting, respecting relevant laws, regulations, prudential standards, industry codes of practice, Bank policies, standards, processes and procedures, considering the consequences of decisions and, speaking up when needing help.

There may be times when you are unsure if your actions or decisions may be inconsistent with our Code and our Values; if this happens you should stop and ask yourself:

“ “Should I” do it – not just, “can I” do it?  
Have I considered the consequences?

Am I doing the right thing, will my action be lawful and consistent with the Bank's Values, policies, standards, procedures and processes?

Will my action deliver a fair and balanced outcome for our customers, community, shareholders, my team members and the Bank?

Am I being respectful, transparent and honest?

Is this in keeping with community expectations? Will I feel proud telling my family, friends, and team members about my actions?

”



**Yes**

If you answer Yes to all of these questions, then proceed provided you have all the necessary approvals.



**No**

If you answer No or Maybe to any of these questions, or don't feel comfortable, stop and seek advice from your people leader or the relevant specialist business unit before proceeding.

# Speaking Up

Speaking up is not always easy to do. But it's the right thing to do.

Respectfully challenging how and why we do things at the Bank enables us to be better together. Similarly, recognising and showing appreciation for our team members when they do great work or embody our Values builds a strong, supportive environment.

Whether it's speaking up with a good idea, seeking help when you are not sure about something, asking questions, challenging the status quo, admitting to a mistake, or raising concerns about illegal, unethical or unacceptable behaviour, it is important that you be an Upstander and speak up.

We will listen, support and protect you when speaking up.

Equally, you must not retaliate against someone because they have offered a different perspective, questioned something, raised a concern, or made a complaint. This ensures all of us feel safe and empowered to speak up.





# Raising concerns.

Raising a concern early can lead to an easy solution, however letting it go might mean things become more complicated and harder to resolve. If you see or experience something that does not seem right, raise your concern as soon as you can.

In the first instance, you are encouraged to **speak to your people leader**.

However, if you don't feel comfortable doing this, there are **other options available**.

IF YOU HAVE A CONCERN ABOUT:...	CONTACT
Discrimination, sexual harassment, harassment or bullying	<a href="#">People Advisory Centre</a> ; or <a href="#">Whistleblower</a>
Work health and safety hazard, incident or accident	<a href="#">Work Health Safety Team</a>
Fraud (internal and external) or scams, whether known or suspected.	<a href="#">Report fraud or scams</a> ; or <a href="#">Whistleblower</a>
Unusual or suspicious activity: <ul style="list-style-type: none"> <li>· Money laundering</li> <li>· Terrorism funding</li> <li>· Modern slavery and other human impact crimes</li> <li>· Unusual business activities which do not align with current practice or policies</li> </ul>	<a href="#">Financial Crime Risk</a> ; or <a href="#">Whistleblower</a>
Operational Risk issues or events	<a href="#">Operational Risk</a>
Conflicts of Interest	<a href="#">Operational Risk</a> ; or <a href="#">Whistleblower</a>
Reportable conduct (as defined in the Whistleblower Policy)	<a href="#">Whistleblower</a>
Information and cyber security matters including: <ul style="list-style-type: none"> <li>· unauthorised access or breach of confidential information,</li> <li>· or unusual or suspicious software or emails</li> </ul>	<a href="#">IT Helpdesk</a>



## Whistleblower

In line with the Bank's commitment to promote integrity, accountability and ethical behaviour, as well as a culture where individuals feel safe to report issues or improper conduct, we provide a confidential Whistleblower Service.

The service provides peace of mind to Whistleblowers that their concern will be treated confidentially, and they will be protected from detriment when reporting a concern regarding past, present, or future suspected or actual breach of law, significant breach of Bank policy, or fraudulent and unethical behaviour.

[Whistleblower Policy](#)

# Helping our customers and communities

Customers and community are at the heart of what we do.

We put our customers and community at the heart of everything we do to improve their prosperity. When dealing with current and potential customers we aim to deliver a positive impact by providing inclusive, sustainable, and accessible banking. We commit to always communicating clearly, developing inclusive products, providing quality service, and making decisions that make a difference for our customers and community.

We will collaborate and support our customers and communities to drive action towards a resilient and sustainable future by progressing our sustainability-related commitments and ambitions.

## What this means for all of us:

- Give our customers a great experience by listening, being respectful and honest, and providing a personalised service.
- Only offer financial products and services that are consistent with targeted customers' needs, and never put your own interests before those of our customers or businesses.
- Take extra care and help our customers who are experiencing vulnerability, financial difficulty or who are exposed to financial scams and/or fraud.
- Advise customers where you are qualified and authorised to do so, and if you are not, refer them to a team member who is.
- Respect and protect our customers' information by only retaining and accessing it for valid business reasons and sharing it with those who are authorised to receive it.
- Welcome customer feedback, and where a customer is dissatisfied, take the necessary steps so we can help resolve their complaint in a fair, transparent, and timely manner.
- Ensure compliance with banking and financial services laws, anti-money laundering laws and subscribed industry codes.
- Consider environmental, social and governance risks and opportunities when making decisions.

## Key supporting policies you should know

[Anti-Money Laundering and Counter-Terrorism Financing Policy](#)

[Customer Complaints Policy](#)

[Consumer Protection & Competitive Practices Compliance Manual](#)

[Vulnerable Customer Policy](#)

[Fraud Management Policy](#)

[Product Lifecycle Policy](#)

[Privacy Compliance Standard](#)

[Monitoring Training and Supervision Policy](#)

# Respect and safety of people

We are better together and all deserve to feel like we belong.

Genuinely caring for our people and customers is at the core of who we are. Together, we commit to creating a positive, respectful, and safe workplace for each other and our customers. We do not tolerate and will be proactive in preventing unlawful discrimination, harassment, sexual harassment, bullying, or any other unsafe work practices.

To support creating a respectful and safe workplace, we believe in building the capability of individuals, teams, and leaders to help them, and our business, to perform and grow.

## What this means for all of us:

- Be inclusive of others by encouraging and being respectful of diversity, different opinions, and ideas.
- Consider how you show respect to others and contribute to workplace safety, wellbeing, and inclusion.
- Behave and make decisions that are free from discrimination, harassment, sexual harassment, and workplace bullying when working for, or representing the Bank, regardless of where the work is performed, or the tools used.
- Ensure your safety and that of others by doing the right thing and complying with relevant health, safety, and security requirements. Help those you work with to do the same.
- Take reasonable care when at work, travelling, or participating in any work-related activities. If alcohol is served, consume it responsibly, and ensure it never impacts your safety or that of others.
- Be an Upstander and speak up when you see or experience unacceptable behaviour. The Bank will assist you, take steps to stop the behaviour, and apply consequences where appropriate.
- Take action and report hazards, incidents and injuries that have the potential to put you or others at risk or has caused an injury.

## Key supporting policies you should know

[Diversity and Inclusion Policy](#)

[Discrimination and Harassment Policy](#)

[Bullying in the Workplace Policy](#)

[Complaints Procedure for Employees](#)

[Drug and Alcohol Policy](#)

[Work Health & Safety Policy](#)

# Strengthening risk and governance

We are proud of the trust placed in us and strive to do the right thing to maintain that trust.

We have strong standards of integrity and ethics and take our corporate and individual obligations to comply with laws, regulations, industry codes and market disclosure obligations that govern our banking practices seriously.

We protect our customers, community, business, and the integrity of the Australian financial system by respecting and meeting our obligations including those in relation to: banking, financial services and credit, consumer protection, anti-bribery and corruption, anti-money laundering and counter terrorism financing, economic and trade sanctions, anti-modern slavery, and managing financial crime risk and fraud.

## What this means for all of us:

- Know and comply with laws, regulations, industry codes, Bank policies, standards, processes and procedures when performing work and representing the Bank. Stay informed and consider evolving regulations and stakeholder expectations to manage risk.
- Hold the relevant accreditation required for your role and complete mandatory learning assigned within designated timeframes. Have a growth mindset and share knowledge.
- Respect the confidentiality and integrity of Bank information and data, and the privacy of customers' and employees' personal information. Protect information and data by collecting, processing, transmitting, and storing it with the right level of security in line with policy.
- Be proactive in reporting perceived, potential, or actual conflicts of interest. If there is an actual or potential conflict this must be disclosed to your leader so the circumstances can be assessed and appropriately managed.
- Avoid situations where the receiving or giving of gifts and/or entertainment may give rise to improper influence, whether actual or perceived.
- Recognise the trust placed in you to use and protect all Bank property and assets (including but not limited to electronic devices (e.g., laptop, smartphone) and associated software, systems and data, motor vehicles, corporate credit cards) in accordance with the terms on which the Bank provides them.
- Engage in conduct (including outside work) that maintains the integrity and reputation of the Bank. Use social media platforms responsibly. Only authorised Bank representatives may speak or communicate on behalf of the Bank.
- Ensure the Bank's environment, social and governance (ESG) policies and positions are considered when making decisions on behalf of the Bank.
- Do not transact with or enter into contracts with suppliers where there is a suspected or identified case of slavery or human trafficking. Credit must not be extended to organisations or individuals that have caused or contributed to modern slavery practices and where remediation efforts have been unsuccessful.
- Never engage in anti-competitive conduct, market manipulation or predatory market practices.
- Do not make donations to any political party or independent member or candidate on behalf of the Bank. Attendance at any paid events hosted by or featuring members of parliament must have the prior approval of the Bank.
- Be beyond reproach by making ethical decisions in your dealings of securities, and only trade in Bendigo and Adelaide Bank securities outside any relevant blackout periods. Never take advantage of or disclose inside information to create a securities trading advantage for yourself or others.
- Be proactive in acknowledging, owning and reporting mistakes so we can fix them promptly, fairly and comprehensively.



# Strengthening risk and governance

## Key supporting policies you should know

[Acceptable Use of Technology Policy](#)

[Anti-Bribery and Corruption Policy](#)

[Anti-Slavery and Human Trafficking Policy](#)

[Communications Policy](#)

[Conflicts of Interest Policy](#)

[Corporate Card and Expense  
Reimbursement Policy](#)

[Data and Information Classification &  
Handling Standard](#)

[Fraud Management Policy](#)

[Gift and Entertainment Policy](#)

[Information Security Policy](#)

[Mobile Device Use Standard](#)

[Motor Vehicle Policy](#)

[Privacy Compliance Standard](#)

[Sanctions Policy](#)

[Securities Trading Policy](#)



# Our expectations of leaders

Leadership requires deliberate focus.

Everything a leader does is seen and everything they say is heard.

We know that what leaders do every day through every interaction and every decision, matters.

We expect our senior leaders and people leaders to set the right tone by: modelling our Values and behaviours, rewarding people for their impact, and holding people to account when conduct standards and behavioural expectations are not met.

## As a leader:

- Role model ethical and balanced decision making. Encourage diverse perspectives, open sharing, discussion, and debate while supporting and respecting opinions and decisions. Foster an environment where people feel safe to speak up if they see, hear, or suspect something isn't right, see an opportunity for improvement or have made a mistake.
- Set clear goals and expectations for your team. Coach and enable your team, support them to navigate complexity embrace change, develop and grow. Where performance is not where it needs to be, give extra support so performance can be improved.
- Recognise the value of giving and receiving feedback. Celebrate people when they have done well and work in ways that embody our Values and Behaviours. Do not shy away from challenging conversations.
- Hold yourself and your team to account when mistakes are made, problems or risks are identified, or unacceptable behaviour displayed. Always take prompt action to fix things and deal with unacceptable conduct. Ensure consequences are applied in a fair, proportionate, and consistent manner.

## Related documents and framework

[Leadership Behaviours](#)

[Lead BEN](#)





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Bendigo and Adelaide Bank Limited, ABN 11 068 049 178, Australian Credit Licence 237879.