

judobank

The Judo Code.

Our way of doing business

30.11.2023

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1. Message from our CEO.

Team,

At Judo, we aspire to excellent personal and professional conduct, doing the right thing by our customers and our team members, establishing trusted relationships and behaving in the right way, not only in the office, but at all times.

Judo's purpose is to become Australia's most trusted SME Business Bank. To do so, it is important that we conduct ourselves in ways that align with our values and that we strive to meet the obligations we have to the Australian community and our customers, to act with integrity, and be guided by the principles of trust and ethics as signatories to the Banking and Finance Oath.

The Judo Code sets out the expectations for all Directors and team members. It is supported by our internal policies and guidelines and is underpinned by our four core values – Trust, Accountability, Performance and Teamwork.

Without a doubt, focussing and working to the Judo Code, is what will help us achieve our purpose of becoming Australia's most trusted SME Business Bank.

I'm proud of the culture and the team we have built at Judo, and I know that by adhering to the Judo Code we will continue to ensure Judo is a great place to work, and a fantastic organisation to do business with.



Joseph Healy

Chief Executive Officer

2. Purpose of the Code.

The Judo Code sets out the expectations on how we work together - from making decisions, to addressing problems, to how we conduct ourselves.

It applies to everyone at Judo (EAJ)– Board Directors, leaders, team members, contractors. Everyone is expected to comply to the Code.

We are all required to work by the Code and conduct ourselves accordingly both professionally and socially. It applies when we are interacting with team members, customers, shareholders, regulatory bodies – everyone!

3. Judo's Values.

Judo's Values are fundamental to our culture. All new team members are introduced to these through our recruitment process, our onboarding materials, our induction sessions, and our recognition program. Importantly, the Values also form part of the assessment of individual performance through the Judo Tracks process.

The Values set out below outline the expected behaviours of everyone at Judo (EAJ).

Trust

Be Real

Be real and genuine. Tell the truth. Let people know where you stand. Use simple language. Call things what they are. Demonstrate integrity. Follow our policies and procedures.

Transparency

Be open and authentic. Actively communicate. Operate on the premise of, "What you see is what you get". Don't have hidden agendas. Don't hide information. Understand the risks you are taking and demonstrate the knowledge of Judo's Risk settings.

Extend Trust

Demonstrate a propensity to trust. Empower those around you and support them when they make mistakes. Escalate issues when appropriate. Build strong truthful relationships with our customers, show empathy and interest in their business.

Accountability

Fighting Fit

Hold yourself accountable. Hold others accountable. Take responsibility for results. Be clear on how you'll communicate how you're doing and how others are doing. Don't blame others or point fingers when things go wrong. Make decisions – the worst decision is no decision. Take actions to fix mistakes.

Keep commitments

Say what you're going to do. Then do what you say you're going to do. Read and understand framework and policies to ensure you are not in breach. Manage the risks you take and work within Judo Risk Appetite, operating following our Risk framework.

Right Wrongs

Makes things right when you're wrong. Apologise quickly. Make restitution where possible. Demonstrate personal humility. Don't cover things up. Don't let personal pride get in the way of doing the right thing.

Performance

Deliver Results

Establish a track record of results. Get the right things done. Make things happen. Be on time and within budget. Don't over-promise and under-deliver. Don't make excuses for not delivering. Ensure you take reasonable steps to identify, assess and manage risk. Take the right risk for the right return.

Push Possibilities Forward

Continuously improve. Increase your capabilities. Be a constant learner. Develop feedback systems – both formal and informal. Act upon the feedback you receive. Thank people for feedback. Don't assume your knowledge and skills will be sufficient for tomorrow's challenges. Welcome change as an opportunity, not a threat. Defy, not respect, tradition. Continue to scan the external environment for change.

Cultural Impact

Make it FUN. Be happy. Love your job. Be aware of your shadow. Have a positive impact on the Judo Family. Keep up with competitors' actions and share your knowledge. Eliminate bureaucracy at every opportunity.

Teamwork**Relationship Obsessed**

Sum of whole is greater than its parts. Commitment to synergistic behaviours that value Judo success over individual performance. Be an active member of the team. Contribute beyond boundaries of your role/function. Energise others. Understand the whole risk not just your part.

Listen first

Listen before you speak. Find out what the most important behaviours are to the people you're working with. Don't assume you know what matters most to others. Don't presume you have all the answers – or all the questions. Respect others with different opinions.

Demonstrate Care

Genuinely care for others. Show you care. Respect the dignity of every person and every role. Treat everyone with respect, especially those who can't do anything for you. Ensure all your actions in and outside of work protect Judo's reputation and brand. Understand Judo's risk appetite.

4. Judo's 16 Leadership Principles.

At Judo, we expect all of our leaders to follow and role model Judo's 16 Leadership Principles.

CUSTOMER OBSESSED

Leaders start with the customer and work backwards.

OWNERSHIP MINDSET

Leaders are owners and they're personally highly accountable.

HAVE GOOD INSTINCTS

Leaders have strong judgement and know when to use it.

LEARN AND ARE CURIOUS

Leaders are never done learning and always seek to improve themselves.

RESILIENT AND MATURE

Leaders keep things in perspective, they move between the dance floor & the balcony when setting context.

THINK BIG

Thinking small is a self-fulfilling prophecy.

HIRE AND DEVELOP THE BEST

Focus on our 'Migrant Mindset' and raise the performance bar with every hire and promotion.

INSIST ON THE HIGHEST STANDARDS

Leaders have relentlessly high standards – many people may think these standards are unreasonably high.

BIAS FOR ACTION

Speed matters in business.

DIVE DEEP

Leaders operate at all levels, stay connected to the details, audit frequently, and are sceptical when metrics and anecdotes differ.

DETEST 'BAD' BUREAUCRACY

Leaders avoid endless meetings, unproductive effort, long reports and poor execution.

EARN TRUST BE AWARE OF YOUR 'SHADOW'

Leaders listen attentively, speak candidly, treat others respectfully and know their actions speak louder than words.

KNOW YOUR PEOPLE

Leaders understand what motivates and drives their teams and how to get the best from them.

HAVE BACKBONE, DISAGREE AND COMMIT

Leaders engage at 'Point Easy' and are obligated to respectfully challenge decisions when they disagree, even if doing so is uncomfortable or exhausting.

COMMITTED TO OUR VALUES

Trust, Teamwork, Accountability and Performance.

RISK CULTURE

Leaders aren't just thinking about the risks in front of them – they're thinking two steps ahead.

5. What we expect of EAJ.

Overall, everyone at Judo (EAJ) is responsible for ensuring that their behaviours and conduct are aligned with Judo's Values and all laws and regulations that apply to Judo and its operations. As representatives of Judo, it is expected that team members are mindful of this in all their interactions both professionally and socially.

Responsibilities

Individuals

Whatever your role at Judo, you should:

- Read and understand our Code
- Demonstrate your personal commitment to act in accordance with the Judo Code and in Judo's best interests and provide support to your team members to ensure they understand their obligations to the Code and the need to adhere to our Values
- Abide by all laws and regulations that apply to Judo and its operations.
- Always provide and promote a safe and healthy working environment and ensure all work health and safety policies and processes are adhered to
- Always keep in mind how your actions can affect the reputation, brand and success of Judo
- Disclose if you have been convicted or found guilty of any criminal offence, subject of an investigation by a law enforcement agency or other government agency or subject of proceedings that may lead to a conviction of any criminal offence.
- Complete all online learning and/or attend sessions where expectations of conduct and behaviours are communicated. Overdue training is considered serious and may result in disciplinary action.
- Never stop learning by participating in training, reading relevant communications and updates
- Have the courage to speak up if something doesn't seem right
- Speak to your People Leader or to a member of the Management Board if you have any concerns or need clarification.

Leaders including the Management Board

As a leader at Judo, whether you a member of the Management Board or a People Leader, you should:

- Lead by example by role modelling the Judo Values and challenge others to do the same
- Have an ownership mindset and be highly accountable
- Coach and develop your team so they understand what is expected of them in their roles and have access to the resources they need to adhere to the Judo Values
- Provide an environment where team members can raise their concerns and discuss them openly without fear of reprisal or reprimand
- Identify any breaches of the Code and address these in accordance with Judo policies and processes
- Lead and encourage strong governance and compliance practices within your team.

The Board

The Board are responsible for approving the annual review of the Judo Code and role modelling the Judo Values.

6. Doing the right thing.

We have a range of policies and frameworks that offer support in as many situations as possible however there may be times where you need to respond to a dilemma, difficult situation or make a decision that may not have a clear rule or process to follow.

The following questions will help you decide on how you should respond or what action to take when facing a challenging situation or decision.

- Is my behaviour inconsistent with the Judo Values?
- Is my/the team members decision or action not in compliance with Judo policies, frameworks and applicable laws and regulations?
- Does my/the team members decision or action have an adverse impact on Judo's reputation or brand?
- Does my/the team members decision or action have an adverse impact on other team members or customers?
- Am I making a decision or taking action due to time pressure?

If the answer to the above questions is 'Yes' or you are unsure then you should seek help (refer to section 9)

7. Our Commitments and Key Policies.

In addition to our Values, which guide us on how we behave, we also have policies and frameworks which outline how we make decisions and ensure that we meet our regulatory and legal obligations. Our key group policies fall into three categories which will help you understand, locate and access those most relevant to you, and we have summarised our commitments to each of them:

- Our customers and Communities
- Our People
- Governance and Risk

It is important that you read and understand the policies referenced below, in particular the specific policies that are most relevant to your role and your team.

7.1 Customers and Communities.

When making decisions that affect our customers and communities, you should apply our Values and refer to our commitments and key policies and guidelines outlined below:

Commitments

- We are committed to delivering a consistent personalised service with highly capable and experienced relationship bankers.
- Our highly capable and empowered bankers and risk executives exercise judgement for the specific circumstances of each customer.
- We value our customers and are committed to protecting their safety, security and privacy. We will treat those who appear to be experiencing vulnerability with respect, sensitivity and compassion and will take the necessary action to enable our customers to suitably access or undertake their banking and safeguard their physical wellbeing as far as practicable in all circumstances based on the information provided to us.
- We believe that all SMEs deserve to have access to financial services to help grow their business. We believe that we can help provide more financial inclusion in Australia through, and to our SME community.
- We work with other businesses, governments and charitable organisations to create stronger communities.
- We encourage good corporate citizenship.
- We are committed to operating more sustainably and offering the products, services, advice and advocacy that supports the sustainability and continued resilience of our SME customers and the communities we operate in.

Key policies and documents

- Complaints Handling
- Conflict of Interest
- Privacy Policy
- ESG Policy
- Dealing with customers experiencing vulnerability

7.2 People.

When making decisions that affect our people, you should apply our Values and refer to our commitments the key policies and guidelines outlined below:

Commitments

- We act honestly and with high standards of personal integrity.
- We role model professionalism whether in person, online or through any form of communication. This includes actions inside and outside of Judo and should always reflect positively on Judo's reputation as well as yourself.
- We are committed in having a workplace which is free from bullying, harassment, and discrimination.
- We are passionate about fostering an inclusive and diverse workforce and are committed to maintaining a flexible work environment where all employees are treated fairly and respectfully. All our team members can bring their whole selves to work and have equal access to opportunities to achieve success.
- We are committed to providing a safe and healthy environment for all and understand and follow work health and safety expectations and instructions provided and we do our jobs in a safe, responsible and effective manner
- We hire, promote and recognise individuals that demonstrate the highest levels of professional standards and live our Values.
- We only act within our authority and only use technology and other assets responsibly.
- We are accountable for continuously building our capability and applying best practice in our roles, undertaking mandatory training, retain certifications where relevant and continue education where required.
- We have a commitment to serve all interests in good faith, compete with honour and pursue its ends with ethical restraint. In doing so, everyone at Judo (EAJ) ensures they are aware of the potential for conflicts of interest to arise and of their responsibility to disclose and manage them effectively.

Key policies and documents

- Being on your game is important
- Getting personal
- Hiring the best talent
- Inclusion, Equity & Diversity Policy
- Know your limits
- Our differences make us cool
- Remuneration Policy
- Off track policy
- Looking after yourself and each other
- Spending Judo's money
- Education Assistance Policy
- Conflicts of Interest Policy
- Delegations Framework

7.3 Governance and Risk.

When making decisions that affect governance and risk, you should apply our Values and refer to our commitments the key policies and guidelines outlined below:

Commitments

- We fully comply with all laws, regulations and professional standards that apply to us.
- We respect an individual's privacy and confidentiality of personal information and do not use it other than for the purposes for which it was obtained.
- We prohibit the use of information for insider trading.
- Everyone at Judo is a Risk Manager and operate within well understood risk appetite, risk limits and policies.
- We ensure that any actual, suspected or potential events including those assessed as near misses, potential internal policy and regulatory compliance breaches are identified, reported and managed in accordance with the requirements of our policies.
- We have a limited appetite for fraud events and adhere to the overall Risk Management Framework to prevent and identify fraud.
- We are committed to complying with all applicable anti-bribery and anti-corruption laws in the jurisdictions in which we operate.

Key policies and documents

- Risk Management Strategy
- Risk Appetite Statement
- Credit Risk Management Framework
- Fraud Policy
- Risk Events and Breaches
- Anti-bribery and Corruption Policy
- Securities Trading Policy
- AML/CTF Program Parts A & B
- Conflict of Interest
- Privacy Policy

8. Speaking up and getting help.

Help and guidance is always available.

If you see something that you are uncomfortable about, we ask you to act with courage and speak up. This includes situations where you believe that team members are acting inappropriately or are not in compliance with the Judo Code or policies and procedures. It doesn't matter how big or small the matter is or who is involved, Judo will take action where there has been non-compliance with the Judo Code, policies or procedures.

If you are unsure about the matter or what to do, you can ask for support from:

- a member of the Management Board
- member of the Senior Leadership Group
- your People Leader
- your Risk Partner
- your P&C Business Partner

If you do not feel comfortable speaking to one of the above, you can contact Judo's external Whistleblower hotline – STOPline.

STOPline anonymous hotline

STOPline is a confidential and independently monitored Whistleblower service . You can contact them on:

Telephone: 1300 30 45 50

Email: judobank@stoline.com.au

Website: <https://judobank.stoplilereport.com>

App: Disclosures can be made via the free STOPline App. To download, search for STOPline in the iTunes App Store or Goggle Play.

Alternatively, Judo's designated Whistleblower Protection Officer is Yien Hong (yien.hong@judo.bank)

Disclosures of information can be made anonymously, and all disclosures of information will be treated confidentially.

Reported breaches of the Code will be investigated and if substantiated will result in disciplinary action being taken, which can include formal warnings and termination of employment.

8.1 Conduct at Judo.

In addition to the Values, and the key policies outlined in this Code, Judo has many frameworks, policies and guidelines which also outline expected conduct for everyone at Judo (EAJ) or certain team members depending on their role.

These frameworks, policies and guidelines are the way that Judo communicates the obligations from the various regulations, licence obligations and laws that impact our operation as an ADI. In some cases, these obligations include a requirement for Judo to provide evidence that we have trained all team members on a particular law or regulation.

As such, Judo will ensure that all team members have access to the frameworks, policies and guidelines relevant to their role. This may be provided via online learning such as compliance learning modules, an annual attestation or through internal meetings and communications.

8.2 Consequences.

Everyone at Judo (EAJ) who does not comply with the standards set in this Code may be subject to disciplinary action up to and including termination of employment or dismissal from the Board of Directors (Board).

As outlined in our performance and consequences guidelines (Being on Your Game Policy), if there is evidence of a potential breach of this code, our policies, processes or controls, or the terms of employment contract, it should be immediately reported to your People Leader or P&C for investigation. Equally, not reporting a breach of this code represents a breach. Serious breaches of the Judo Code will be reported to the Board Risk Committee.

8.3 Governance.

The CPCO manages the Code and is responsible for communicating it to everyone at Judo (EAJ). The Code will also be available on Judo's intranet and external website.

The Code will be reviewed annually by the Board Remuneration and Nomination Committee with the assistance of the CPCO. Any amendments to enhance the policy will be recommended for approval to the Board. Changes to the Code may occur outside this review cycle, as determined by Judo's business needs from time to time.