

judobank™

The Judo Code

October 2021

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Introduction

Judo's purpose is to become Australia's most trusted SME Business Bank. To do so, it is important that our people conduct themselves 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 Employees (team members) and asks that they commit to the Code through an annual affirmation.

As an ADI, Judo will have certain regulatory requirements and expectations as set out in APRA Prudential Standards and ASIC Regulatory Guides including accountabilities under the Banking Executive Accountability Regime (BEAR), satisfying fit and proper requirements and other compliance competence training requirements. The Judo Code encompasses all of these requirements including the Judo Values.

1. 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 the expected behaviours of all team members.

VALUE	THIS MEANS THAT WE
TRUST	<ul style="list-style-type: none"> • Tell the truth and call things out for what they are • Demonstrate integrity • Follow our policies and procedures • Be open and authentic • Don't have hidden agendas and don't hide information
ACCOUNTABILITY	<ul style="list-style-type: none"> • Hold ourselves & others accountable • Don't blame others or point fingers when things go wrong • Make decisions - the worst decision is no decision • Make things right when you're wrong • Make restitution where possible
TEAMWORK	<ul style="list-style-type: none"> • Sum of the whole is greater than its parts • Be an active member of the team • Contribute beyond boundaries of your role / function • Understand the whole risk not just your part • Understand Judo's risk appetite
PERFORMANCE	<ul style="list-style-type: none"> • Establish a track record of results • Get the right things done • Be on time and within budget • Eliminate bureaucracy at every opportunity • Make it FUN. Laugh. Be happy. Love your job.

2. Conduct at Judo

In addition to the Values, Judo has many frameworks, policies and guidelines which outline expected conduct for all team members. Some examples include:

- [Risk Management Framework](#)
- [Compliance Competence Program](#)
- [Judo's Fit and Proper Policy](#)
- [Conflicts of Interest Policy](#)
- [Judo Lending Authority Framework](#)
- [BEAR Accountability Statements and BEAR Guidelines](#)
- [Judo's People Guidelines](#)

These Frameworks 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 relevant to their role. This may be provided via online learning such as a compliance learning modules, an annual attestation or through internal meetings and communications.

3. Team member responsibilities

Overall, team members are responsible for ensuring that their personal behaviours and conduct are aligned with Judo's values, obligations 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 of their interactions both professionally and socially. This includes, for example, expressing opinions on personal social media accounts. Team members must always keep in mind how our actions affect the reputation, brand and success of our organisation. It is every team members responsibility to speak to their People Leader or to a member of the Management Board if they have any concerns or need clarification.

Each director and employee are expected to read the Judo Code and demonstrate their personal commitment to act in accordance with the Judo Code and in Judo's best interests. Team members have a responsibility to 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.

4. Consequences

Directors and employees who do not comply with the standards set in this Code may be subject to disciplinary action, including termination of employment or dismissal from the Board of Directors (Board).

As outlined in our Performance and Consequence Guidelines ([Being on your game](#)), 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.

As outlined in our Whistle-blower policy, team members can also raise issues through the dedicated Whistle-blower phone line or to our Whistle-blower Protection Officer, Yien Hong (yien.hong@judo.bank).

5. Governance

The CPCO manages the People Guidelines and their communication to all team members.

The overarching frameworks, including Risk Management Strategy, Risk Appetite Statement and Compliance Framework, are managed, and communicated by the Chief Risk Officer.

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.