

bank



Whistleblower Policy

1. INTRODUCTION

1.1. Purpose of this Policy

The Board of Directors (the Board) of BankWAW is committed to best practice in risk management, corporate governance, compliance and ethical behaviour generally. As a matter of best practice, the purpose of this Policy is to:

- ensure that individuals who disclose misconduct or an improper state of affairs, offences against the law or information that indicates a significant risk to public safety or to the stability of the financial system, at BankWAW, can do so safely, securely and with confidence that they will be protected and supported
- ensure that disclosures are dealt with by BankWAW appropriately and on a timely basis
- provide transparency around BankWAW's framework for receiving, handling and investigating disclosures
- encourage disclosures
- help deter wrongdoing generally.

The Board has adopted this Policy to provide a framework for an eligible whistleblower of BankWAW to disclose these matters to certain parties. All of our employees who become aware of wrongdoing have a duty to speak up: see Clause 3.1.

This Policy explains:

- how to make a disclosure within BankWAW or external to BankWAW
- the protections available to eligible whistleblowers.

This Policy has been prepared in compliance with the Corporations Act 2001 (Cth) ('the Act'), APRA Prudential Standard CPS 520 Fit and Proper ('CPS 520') and Part IVD of the Taxation Administration Act 1953 (Cth) ('Taxation Administration Act'). The Policy may be read in conjunction with the Act, CPS 520 and Australian Securities and Investments Commission (ASIC) Regulatory Guide 270 Whistleblower policies.

1.2. Application of this Policy

This Policy applies to:

- BankWAW's Directors and employees
- BankWAW's contractors
- employees of BankWAW's contractors
- associates of BankWAW
- a relative, dependant or spouse of any of the above
- eligible whistleblowers and eligible recipients for the purposes of sections 14ZZU and 14ZZV respectively of the Taxation Administration Act.

Matters that qualify for protection under this Policy, the Act and the Taxation Administration Act ('disclosable matters') are:

- information that the eligible whistleblower (defined in Clause 2.2) has reasonable grounds to suspect concern misconduct, or an improper state of affairs or circumstances (defined in Clause 2.3) in relation to BankWAW or a related body corporate
- information indicating BankWAW or a related body corporate (including the related body's employees or officers) have engaged in conduct that:
 - a. constitutes an offence against, or a contravention of, a provision of any of the following:
 - the Act
 - the Australian Securities and Investments Commission Act 2001 (Cth)
 - the Banking Act 1959 (Cth)
 - the Financial Sector (Collection of Data) Act 2001 (Cth)
 - the Insurance Act 1973 (Cth)
 - the Life Insurance Act 1995 (Cth)
 - the National Consumer Credit Protection Act 2009
 - the Superannuation Industry (Supervision) Act 1993 (Cth)
 - b. constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more
 - c. otherwise represents a danger to the public or the financial system
- information that a responsible person does not meet the fit and proper criteria as defined in CPS 520
- information that BankWAW has not complied with the requirements of CPS 520 to provide information to APRA about a responsible person not meeting the fit and proper person criteria.

The following disclosures also qualify for protection under this Policy:

- a public interest disclosure as defined in section 1317AAD (1) of the Act
- an emergency disclosure as defined in section 1317AAD (2) of the Act
- a disclosure to the Commissioner of Taxation under section 14ZZT of the Taxation Administration Act.

Provisions about public interest disclosures and emergency disclosures are contained in Clause 3.2.

Disclosures that are not about disclosable matters do not qualify for protection under the Corporations Act or the Taxation Administration Act where relevant.

2. DEFINITIONS

2.1. Whistleblowing

For the purpose of this Policy, whistleblowing is defined as:

- a disclosure by an eligible whistleblower (defined in Clause 2.2) to an eligible recipient of a disclosable matter (defined in Clause 1.2) in relation to BankWAW or a related body corporate
- a disclosure of information that a responsible person does not meet the APRA-regulated institution's fit and proper criteria as set out in APRA CPS 520
- a disclosure of information that BankWAW has not complied with CPS 520 to provide that information to APRA.

2.2. Whistleblower

For the purpose of this Policy, an eligible whistleblower is defined as:

- an officer of BankWAW
- an employee of BankWAW
- any person who has information that a responsible person does not meet the fit and proper criteria under CPS 520
- any person who has information that BankWAW has not complied with CPS 520 to provide information to APRA about a responsible person not meeting the fit and proper criteria
- paid or unpaid suppliers of services or goods to BankWAW (and the employees of these suppliers)
- an associate of BankWAW
- a relative, dependent or spouse of any of the above who makes a disclosure defined in Clause 2.1
- an eligible whistleblower for the purposes of section 14ZZU of the Taxation Administration Act.

In this Policy, each person in the categories listed above is referred to as either a 'BankWAW person' or a 'discloser', as the case requires.

2.3. Misconduct or an improper state of affairs or circumstances

For the purpose of this Policy, misconduct or an improper state of affairs or circumstances is defined as:

- fraud
- negligence
- breach of trust
- breach of duty
- any conduct that:
 - is dishonest or unethical
 - may cause harm
 - is prohibited by BankWAW's standards or code(s) of conduct
- misconduct or an improper state of affairs or circumstances as provided for in section 14ZZT of the Taxation Administration Act.

Examples of misconduct or an improper state of affairs or circumstances include the following:

- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property
- fraud including tax fraud, money laundering, terrorism financing and the misappropriation of funds
- offering or accepting a bribe
- financial irregularities
- failure to comply with, or breach of, legal or regulatory requirements including taxation legislation
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure.

2.4. Eligible recipient

An eligible recipient is a person within or external to BankWAW who can provide advice on or receive a disclosure of a disclosable matter (defined in Clause 1.2). For the purposes of this Policy an eligible recipient is:

- an officer or Senior Manager of BankWAW
- the Internal or External Auditor (including a member of an audit team conducting an audit) or actuary of BankWAW or related body corporate
- an eligible recipient for the purposes of section 14ZZV of the Taxation Administration Act
- a person authorised by BankWAW to receive disclosures that may qualify for protection, including the Whistleblower Complaints Officer (WCO).

See also 'Who to report to' and 'Disclosure to legal practitioner' in Clause 3.2.

3. DUTY TO REPORT

3.1. Duty of all BankWAW persons

All BankWAW persons have a duty to report known, suspected or potential cases of improper conduct. Failure to do so could result in disciplinary action. BankWAW persons must make a disclosure directly to one of the eligible recipients defined in Clause 2.4 in order to seek protection as an eligible whistleblower.

3.2. Who to report to

Disclosures to eligible recipients of BankWAW:

BankWAW encourages BankWAW persons and disclosers to make disclosures to an internal eligible recipient of BankWAW in the first instance. This is to enable BankWAW to address what has been disclosed as early as possible. This approach is intended to help build confidence and trust in BankWAW's whistleblower policy, processes and procedures.

The WCO is the person appointed to the internal position and is responsible for the management of the whistleblower complaint procedures and will seek the Board's approval for all actions required following the investigation of complaints. The WCO is the People & Culture Manager, or such other person that the Board deems appropriate in the circumstances.

Disclosures to regulatory bodies:

A discloser can make a disclosure directly to regulatory bodies, or other external parties, about a disclosable matter and qualify for protection under the Act and the Taxation Administration Act without making a prior disclosure to BankWAW.

A BankWAW person can make a disclosure external to BankWAW and qualify for protection as a whistleblower if the person reasonably believes it is necessary to contact regulatory bodies or other external parties. Such external disclosures can be made to one or more of the following:

- the Australian Securities and Investments Commission
- the Australian Prudential Regulatory Authority
- the Commissioner of Taxation
- any other Commonwealth body prescribed by regulation.

For further information on how to make external disclosures to regulatory bodies see:

For reports to ASIC

<https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/how-asic-handles-whistleblower-reports/>

For reports to APRA

<https://www.apra.gov.au/become-a-whistleblower-and-make-a-public-interest-disclosure>

For reports to the ATO

<https://www.ato.gov.au/general/gen/whistleblowers/>

Public interest disclosures and emergency disclosures to journalist or Member of Parliament:

A BankWAW person can make a public interest disclosure or an emergency disclosure as defined in the Act to a journalist or Parliamentarian under certain circumstances and qualify for protection. Advice on these types of disclosures and how to make them can be obtained from the WCO or a legal practitioner (see below).

Disclosure to legal practitioner:

Disclosures to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Act and the Taxation Administration Act are protected under this Policy (see Clause 4 below).

3.3. No relief from legal obligation to report

BankWAW persons may have a legal obligation to report certain offences or other matters to regulatory authorities. Making a report in accordance with this Policy may not relieve a BankWAW person of such legal obligations. BankWAW persons should discuss with the WCO or obtain independent legal advice about external reporting obligations.

4. PROTECTION UNDER THIS POLICY

4.1. Whistleblower protection

This Policy protects an eligible whistleblower who:

- reports a disclosable matter as defined in Clause 1.2
- makes a public interest disclosure or an emergency disclosure as provided for in sections 1317AAD (1) and (2) respectively of the Act, or
- makes a disclosure to the Commissioner of Taxation as provided for in section 14ZZT of the Taxation Administration Act.

An eligible whistleblower qualifies for protection from the time they make their disclosure, regardless of whether a BankWAW person, discloser or recipient recognises that the disclosure qualifies for protection.

4.2. Identity protection (confidentiality)

When information is disclosed by a BankWAW person or a discloser in accordance with this Policy, it is illegal for the person receiving the information to tell anyone other than the Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulatory Authority (APRA), the Australian Federal Police or the Commissioner of Taxation any of:

- the information disclosed
- the identity of the person making the disclosure
- any information which will enable the identification of the person making the disclosure unless the BankWAW person or discloser consents to the disclosure.

Exceptions to this prohibition are contained in clause 4.3.

The WCO will provide assurance to a discloser that BankWAW is committed to protecting the confidentiality of their identity.

The WCO will explain the procedures that BankWAW has in place for ensuring confidentiality and privacy (see also 'Protection of Privacy' below).

4.3. Exceptions to prohibition on disclosure of identity or information

The **identity** of a BankWAW person or discloser may be disclosed without that person's consent where the disclosure is made:

- by ASIC, APRA or the Australian Federal Police to a Commonwealth, State or Territory authority to help the authority in the performance of its functions or duties
- to a legal practitioner for the purposes of obtaining legal advice or legal representation about the whistleblower provisions in the Act and/or the Taxation Administration Act
- to a person or body prescribed by Commonwealth regulations.

The information contained in a BankWAW person's or discloser's disclosure may be disclosed without that person's consent if:

- the information does not include the BankWAW person's or discloser's identity
- BankWAW has taken all reasonable steps to reduce the risk that the BankWAW person or discloser will be identified from the information
- it is reasonably necessary in the view of the person conducting the investigation for investigating the issues raised in the disclosure.

4.4. Detrimental conduct

BankWAW's officers, employees, contractors and their relatives, dependants or spouses, must not engage in conduct that causes detriment to a discloser (or another person), in relation to a disclosure, if:

- a. the person believes or suspects that the discloser (or another person) made, may have made, proposes to make or could make a disclosure that qualifies for protection
- b. the belief or suspicion is the reason, or part of the reason, for the conduct.

Examples of detrimental conduct include:

- dismissal of the discloser (or another person)
- injury of the discloser (or another person) in his or her employment
- alteration of a discloser's (or another person's) position or duties to his or her disadvantage
- discrimination between an employee and other employees of the same employer
- harassment or intimidation of a discloser (or another person)
- harm or injury to a discloser (or another person), including psychological harm
- damage to a discloser's (or another person's) property
- damage to a discloser's (or another person's) reputation
- damage to a discloser's (or another person's) business or financial position
- any other damage to a discloser (or another person).

Each example above includes detriment to or a relative, spouse or dependent of the discloser.

The BankWAW's officers, employees, contractors and their relatives, dependants or spouses, must not make a threat to cause detriment to a discloser (or another person) in relation to a disclosure. A threat may be express or implied, or conditional or unconditional. A discloser (or another person) who has been threatened in relation to a disclosure does not have to actually fear that the threat will be carried out.

Examples of detrimental conduct do not include:

- administrative action that is reasonable to protect a BankWAW person from detriment (e.g. when the disclosure relates to wrongdoing in the discloser's immediate work area), or
- managing a BankWAW person's unsatisfactory work performance in accordance with BankWAW's performance management framework.

Under this Policy, the BankWAW person is protected from detrimental conduct by any person (including officers, employees, consultants and contractors of BankWAW) and from a threat to cause detriment to a discloser (or another person) in relation to a disclosure. BankWAW will regard any such conduct very seriously and take appropriate action, which may include, in the case of employees, disciplinary action and dismissal.

Similarly, all reasonable steps must be taken to ensure that no person is subject to, or threatened with, a detriment because of any notification in purported compliance with the requirements of the Taxation Administration Act and APRA CPS 520 (see our Fit and Proper Policy).

The WCO will:

- provide assurance to a discloser that BankWAW is committed to protecting the welfare of the discloser
- explain BankWAW's processes for assessing the risk of detriment against a discloser and other persons after receiving a disclosure
- suggest counselling (or other professional or legal services) available to a discloser
- suggest strategies to help a discloser to minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation
- advise the specific actions BankWAW will take to protect a discloser from risk of detriment (or, if the detriment has already occurred, what specific actions BankWAW will take to protect and support the discloser)
- explain how BankWAW will ensure that Management is aware of its responsibilities under this Policy, including but not limited to:
 - maintain the confidentiality of a disclosure
 - address the risks of isolation or harassment
 - manage conflicts
 - ensure fairness when managing the performance of, or taking other management action relating to, a discloser
- explain to the discloser how they can lodge a complaint if they have suffered detriment and what actions BankWAW will take in response to the complaint
- explain how the discloser can seek independent legal advice or contact the relevant regulatory bodies in the event that they believe they have suffered detriment.

4.5. Improper conduct

Making a disclosure under this Policy may provide some protection to eligible whistleblowers in relation to their involvement in misconduct or an improper state of affairs (see “What if the whistleblower is involved” below).

4.6. Industrial relations issues

Employee and industrial relations related issues and human resources related issues are excluded from the operation of this Policy because there are other established mechanisms to raise such complaints.

4.7. Personal work-related grievances, vexatious complaints

Personal work-related grievances and malicious or vexatious complaints do not qualify for protection under this Policy.

Unsubstantiated allegations that are proven to have been malicious, or are proven to be knowingly false, will be viewed seriously, with disciplinary actions taken by BankWAW where appropriate.

5. HANDLING A WHISTLEBLOWER DISCLOSURE

Receipt of a non-anonymous whistleblower disclosure by the WCO will be acknowledged by the WCO to the whistleblower. The WCO will then promptly refer the matter to the appropriate person within BankWAW for investigation.

The WCO will keep the whistleblower regularly informed of the progress of action taken in respect of the report they make.

6. INVESTIGATING REPORTS OF IMPROPER CONDUCT

6.1. Who investigates a report

Where a disclosure is referred by the WCO to the Chief Executive Officer (CEO), the CEO will ask a Senior Manager of BankWAW to investigate the disclosure. The Senior Manager likely to be asked to carry out the investigation will be:

- the Chief Risk Officer; or
- another Senior Manager authorised by the Board.

In certain circumstances (for example, where the disclosure involves allegations of fraud) the WCO may inform the Board and recommend the appointment of external investigators.

Senior Managers will only be asked to investigate a matter if they can do so in a disinterested manner. For example, a Manager will not be asked to investigate any matter that relates to their own department.

In the event that the disclosure relates to BankWAW’s CEO, WCO, or a Director, such a disclosure will be directed immediately to the Chair of the Risk Management Committee or the Chair of the Audit Committee.

Where a disclosure relates to a significant matter involving the CEO, or a Senior Manager that reports directly to the CEO, the WCO will refer the disclosure directly to the Chair of the Board.

6.2. How an investigation is carried out

The person appointed to investigate the disclosure will be required to follow BankWAW's usual procedures for handling a complaint or disciplinary issue. This would generally involve:

- appointing a person within BankWAW who will be responsible for handling and investigating the disclosure
- undertaking a fair, independent and discreet investigation into the substance of the report to determine whether:
 - a. it falls within this Whistleblower Policy
 - b. a formal, in-depth investigation is required
- determining that there is evidence to support the disclosure
- setting the timeframe for the investigation
- respecting individual confidentiality (see Clauses 4.2 and 6.5 for further information on confidentiality)
- determining the nature of any technical, financial or legal advice that may be required to support the investigation
- collecting all available data and investigating the disclosure
- interviewing any relevant person in order to observe the rules of procedural fairness;
- proceeding with due care and appropriate speed
- consulting or informing employee representative bodies of the substance of the disclosure, as required.

6.3. Where the identity of the discloser is known

Where the whistleblower has identified himself or herself, the investigator would usually begin the investigation by interviewing that person. However, this person's identity would not be made known to any other person without the whistleblower's specific consent, including in the circumstances set out in section 10.1 below.

6.4. Where the identity of the discloser is not known

BankWAW may not be able to undertake an investigation if a disclosure is made anonymously, and the BankWAW person or discloser has refused or omitted to provide a means of contacting them.

6.5. Identity of discloser cannot be disclosed by investigator or any other person

1. Without the BankWAW person or discloser's consent, BankWAW will not disclose information that is contained in a disclosure as part of its investigation process— unless:
 - a. the information does not include the BankWAW person's or discloser's identity
 - b. BankWAW removes information relating to the BankWAW person's or discloser's identity or other information that is likely to lead to the identification of that person (e.g. name, position title and other identifying details)
 - c. it is reasonably necessary for investigating the disclosure.

2. If a BankWAW person or discloser makes a disclosure that qualifies for protection under Part IVD of the Taxation Administration Act, a person involved in the investigation is not required to:
- a. disclose to a court or tribunal:
 - i. the identity of the BankWAW person or discloser, or
 - ii. information that is likely to lead to the identification of the BankWAW person or discloser

and,

- b. produce to a court or tribunal a document containing:
 - i. the identity of the BankWAW person or discloser, or
 - ii. information that is likely to lead to the identification of the BankWAW person or discloser.

This is except where it is necessary to do so for the purposes of giving effect to Part IVD of the Taxation Administration Act, or the court or tribunal thinks it necessary in the interests of justice to do so.

6.6. Keeping the BankWAW person or discloser informed during the investigation

A disclosure will be acknowledged within a reasonable period after it is received, if the BankWAW person or discloser can be contacted (including through anonymous channels).

BankWAW will provide the BankWAW person or discloser with updates:

- when the investigation process has begun
- while the investigation is in progress
- after the investigation has been finalised.

The BankWAW person or discloser will receive an update in person from the WCO while an investigation is ongoing, at least every three months.

6.6. Keeping the BankWAW person or discloser informed during the investigation

A disclosure will be acknowledged within a reasonable period after it is received, if the BankWAW person or discloser can be contacted (including through anonymous channels).

BankWAW will provide the BankWAW person or discloser with updates:

- when the investigation process has begun
- while the investigation is in progress
- after the investigation has been finalised.

The BankWAW person or discloser will receive an update in person from the WCO while an investigation is ongoing, at least every three months.

6.7. Documents and reporting process

The findings from an investigation will be documented by BankWAW and such documentation will be retained by BankWAW for five (5) years.

7. OUTCOME OF INVESTIGATIONS

7.1. What happens after an investigation

At the end of the investigation, the investigator will report his or her findings to the WCO or CEO as the investigator deems appropriate, to determine the appropriate response. This response will include rectifying any improper conduct and taking any action required to prevent any future occurrences of the same or similar conduct.

In the event that the investigation is related to BankWAW's Managing Director, CEO, WCO, or a Director, the investigator will report his or her findings directly to the Chair of the Risk Management Committee.

Where issues of discipline arise, the response will also be in line with BankWAW's procedures for disciplinary matters.

Where allegations of improper conduct made against another person cannot be substantiated, that person will be advised accordingly and will be entitled to continue in his or her role as if the allegations had not been made.

7.2. What if the whistleblower is involved

A person who has committed or been involved in improper conduct will not be immune from disciplinary action merely because they have reported the improper conduct in accordance with this Policy.

However, the BankWAW person's conduct in making the report is likely to be considered in determining what disciplinary action is appropriate.

In some limited circumstances, a full and frank admission may be a mitigating consideration in respect of disciplinary or other action.

7.3. Review

If a BankWAW person or discloser is not satisfied with the outcome of an investigation, a review may be conducted by an officer of BankWAW who is not involved in handling and investigating disclosures.

The review findings will be provided to the Board or the Risk Management Committee.

BankWAW is not obliged to reopen an investigation and may conclude a review if it finds that the investigation was conducted properly, or new information is either not available or would not change the findings of the investigation.

7.4. Compensation and other remedies

Nothing in this Policy prevents a BankWAW person or discloser from seeking compensation and other remedies, including where appropriate remedies set out in section 14ZZZA of the Taxation Administration Act, through the courts if:

- he or she suffers loss, damage or injury because of a disclosure
- the entity failed to prevent a person from causing the loss, damage or injury.

Nothing in this Policy prevents a BankWAW person or a discloser from lodging a complaint with a regulatory body if they are not satisfied with the outcome of BankWAW's investigation.

BankWAW encourages BankWAW persons and disclosers to seek independent advice regarding compensation and remedies at law.

7.5. Civil, criminal and administrative liability protection

BankWAW persons and disclosers are protected under section 1317AB (1) of the Act from any of the following in relation to their disclosure:

- civil liability (e.g. any legal action against a BankWAW person or discloser for breach of an employment contract, duty of confidentiality or another contractual obligation)
- criminal liability (e.g. attempted prosecution of a BankWAW person or discloser for unlawfully releasing information, or other use of the disclosure against the person in a prosecution [other than for making a false disclosure])
- administrative liability (e.g. disciplinary action for making the disclosure).

Nothing in this Policy grants immunity for any misconduct a BankWAW person or discloser has engaged in that is revealed in their disclosure.

8. PROTECTING PRIVACY

8.1. Protection of privacy

To the extent that any of the information recorded by the WCO on BankWAW's behalf constitutes "personal information" about the whistleblower under applicable Privacy legislation, the following applies:

- the purpose of the collection of that information is to assist the WCO and BankWAW to respond to issues raised by the whistleblower and to protect or enforce BankWAW's legal rights or interests or to defend any claims
- personal information may be used for the primary purpose for which it was collected or for any related secondary purpose that could reasonably be expected
- personal information may be disclosed as described under this section.

BankWAW's Policy is not to collect 'sensitive information' unless the person to whom the information relates consents to the collection and the information is reasonably necessary for one or more of BankWAW's functions or activities for the implementation of this Policy, or the collection is authorised or required by law.

'Sensitive information' means information or an opinion about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, memberships of a profession or trade, membership of a trade union, sexual orientation or practices, criminal record or health, genetic information, biometric information and templates.

9. ACCESSIBILITY OF THIS POLICY

This Policy will be made available to BankWAW's officers and employees via the following:

- staff briefing sessions and/or smaller team meetings
- staff intranet or other communication platform
- staff noticeboards
- the employee handbook
- employee induction information packs
- training for new starters
- on the website.

For potential disclosers outside BankWAW, this Policy will be made available via BankWAW's website.

10. POLICY REVIEW

10.1. Reports provided under this Policy

The WCO will provide periodic reports containing a general summary of the number and type of cases made to the WCO, together with a description of the nature and results of any investigation conducted as a result of a report.

In the compilation of these reports, the identity of any person who has made a report under this Policy in good faith or any information which may enable that person to be identified will not be disclosed.

These reports will be provided to the:

- CEO or delegate and the Chief Risk Officer on a regular basis (the frequency to be determined by the CEO from time to time)
- the Risk Management Committee every quarter.

A consolidated report will also be provided to the Risk Management Committee each year.

10.2. Monitoring and review of Policy

10.2.1. The Board reviews this Policy as necessary but at least on an annual basis via the Six-Monthly Reporting Template. The Chief Executive Officer and Chief Risk Officer will assist with suggested amendments to the Policy having regard to:

- Changes to regulation, policy, codes or terms of reference
- Determinations made public by regulators
- Industry bulletins and compliance notes
- Advice from retained consultants
- The organisation's risk appetite.

10.2.2. Policy compliance records are to be maintained on a 12 month rotational basis.

10.2.3. A review of compliance with this Policy and the APS is conducted on a regular basis by the Internal Auditors.

10.2.4. Proposed Policy changes are to be marked up and submitted to the Board in draft form for consideration and, when approved, are to be shaded, where possible, within that revision for easy reference.

10.2.5. Where such reviews warrant the amendment of the Policy, such revisions are to be recorded in the Policy & Procedure Review Control.



BankWAW Head Office

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BSB 803-070 | ABN 48 087 651 787 | AFSL / Australian Credit Licence 247298.

Internet Banking

web: bankwaw.com.au

Contact Centre

tel: 1300 368 555

VISA Hot-line

tel: 1800 648 027

24 hour service for lost or stolen cards

Internal Dispute Resolution

Complaints Officer - BankWAW

PO Box 568 Wodonga VIC 3689

email: info@bankwaw.com.au | **web:** bankwaw.com.au

Phone: 02 6022 8445 or AH 1300 368 555 | **Fax:** 02 6022 8401

External Dispute Resolution

Australian Financial Complaints Authority

GPO Box 3 Melbourne Vic 3001

tel: 1800 931 678 | **email:** info@afca.org.au | **web:** afca.org.au

BankWAW is the registered business name held by WAW Credit Union Co-operative Ltd.
Effective 30 October, 2024