CODE OF CONDUCT.

Behaving responsibly and building our culture.

BOQ GROUP





BOQ Group acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the land where we live and work. We pay our respects to Elders past and present.

This artwork was commissioned through Merinda Walters, a proud Kamilaroi woman.

Titled Burrul gi-gi magula (Growing Together), this story represents a celebration of the past 150 years of BOQ and a promise for the future.

Message from Chairman and CEO.

Dear Colleagues,

For generations, Australians have placed their trust in **Bank of Queensland Group** to help shape their financial futures. From its origins in Queensland more than 150 years ago, BOQ Group has grown into a respected regional banking leader, supporting customers through life's milestones—whether buying a first home, starting a business, or achieving savings goals.

Our dedication to our purpose of 'building social capital through banking' has remained central, guiding how we serve our customers and communities.

As Chair and CEO, we are proud to reaffirm our unwavering commitment to responsible banking and ethical leadership. Equally, to the United Nations Principles of Responsible Banking, centred on transparency, accountability and engagement.

Our Code is more than a set of rules—it's a reflection of our shared values and the culture we aspire to demonstrate. It defines the standards and expectations for our behaviour, ensuring that integrity, customer focus, and agility are at the heart of everything we do.

As leaders, we are committed to setting the tone from the top. We lead by example, prioritising transparency, trust, and strong governance. Accountability is key: we own our decisions, learn from experience, and support each other through challenges. Our Code empowers everyone to contribute to a respectful, inclusive, and safe workplace, where speaking up is encouraged and retaliation is not tolerated.

We promise ongoing improvement, regularly reviewing our strategy and adapting to new challenges. By living our values and upholding our Code, we strengthen our culture and build a brighter future for our people, customers, and communities.

Andrew Fraser, Chair
Rod Finch, Managing Director
and Chief Executive Officer



Get to know our code.

Our Code Matters
Our Code outlines the expectations and standards of behaviour for employees, agency and contingency workers, leaders, senior leadership and board directors at BOQ Group. It connects our Purpose, Vision and Values with our key policies to make a positive difference to our customers, people, partners, shareholders, and community.

Our Code brings our Values to life and highlights how we will always strive to achieve more and be better.

Our Code describes the workplace we all want to work in. A place where we're valued, feel safe and look after each other. A diverse and inclusive workplace where everyone matters. We listen and value our diverse voices. Take care of the things we've been trusted with and Speak Up when we see something is wrong.

What Our Code means to you
Our Code applies to everyone who works for us and with us. It outlines our expectations of what it means to behave professionally, ethically and appropriately.

Operating with integrity and accountability is everyone's responsibility. Our Code helps you to navigate complex situations, make ethical decisions, be risk conscious and serve customers and communities well. No matter what role you are in, it's the duty of all of us to follow the standards set out in Our Code.

Knowing and understanding Our Code, as well as our key policies and how and when they apply, will help to protect you, our customers and BOQ Group.

When does Our Code apply?
Our Code applies to all employees in the workplace, during and outside of normal working hours. Our Code also applies outside the workplace if the conduct takes place in a setting which is in connection with work or otherwise whilst employees are representing BOQ Group.

Our Code applies whenever you interact with others on BOQ Group's behalf, such as colleagues, customers, shareholders, regulators, suppliers, business partners and the communities in which we operate. Our Code applies to any conduct which might impact on BOQ Group's business or reputation.

Our Code also applies to conduct which occurs online or through other electronic media where it is connected with BOQ Group. For example, it may apply to conduct online where employees interact with other employees, customers or members of the public (e.g. on social media, through text messaging or email) whether this occurs inside or outside of the workplace or during or outside of normal working hours.

Any breaches of Our Code may result in consequences.

How to use the Code
Every day, we're faced with situations where we need to make a decision. Our Code will help to guide your behaviour, actions and provide advice on:

- ✓ Situations you may face during your employment with BOQ Group
- ✓ Knowing what's right
- ✓ Making a tough decision
- ✓ Asking a question or raising a concern
- ✓ Speaking up on serious issues
- ✓ Knowing when to say no

Expectations of You
- Read, understand and follow Our Code.
- Behave professionally and treat others with respect and courtesy.
- Comply with reasonable and lawful direction.
- Understand the risks in your role and how to manage them.
- Admit and talk about mistakes as they happen and learn from those mistakes.
- Act honestly, ethically and with integrity at all times.
- Call out things that don't seem right.
- Know and understand BOQ Group policies, laws and regulations that are applicable in your daily work.
- Use Qu.E.S.T, our decision making framework to help you make informed decisions, challenge the status quo and provide ideas for solutions.
- Seek advice when things are not clear; take .accountability for your actions and performance, focusing on making a positive difference and continuously improving.
- Promptly complete any training you need to do or that is assigned to you.
- Act in the best interest of BOQ Group, our customers and community.
- Make sure that any third-party contractors, agents or consultants we work with abide by our Supplier Code of Conduct.
- If you believe Our Code is not being followed, then please Speak Up.
- Be fit to safely perform duties, unimpaired by drugs, alcohol, other substances or fatigue

Expectations of Leaders:
- Recognise people who positively impact our culture through their results, behaviours and values.
- Help your team understand Our Code and apply it in practice.
- Hold people to account if they breach Our Code.
- Foster a safe and inclusive culture and encourage people to Speak Up or ask questions.
- Make sure any concerns or breaches you become aware of are dealt with in line with Our Code.



Our code at a glance. We are...



Chosen by customers.
Providing exceptional customer experiences. Delivering products and services that meet our customers' circumstances.



Connected to community.
Investing in our communities.



Acting as one team.
Working together. Adopting an enterprise-wide mindset. Ensuring our workplace is safe and inclusive for everyone.



Leading with Impact.
Leadership of Self, Team, Business and Enterprise.



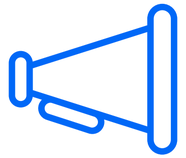
Making good decisions.
Operate with risk-aware mindsets and behaviours. Balance perspectives and understand the impact of our decisions, delivering value.



Working with integrity.
Accountable, honest and act with integrity and care.



Protecting our bank & respecting information.
Secure and protect the Bank's assets. Respect Information and privacy.



Taking action. Speaking up.
Courageous to call things out. Act according to Our Code, policies, laws and regulations.

BOQ Group purpose and values .

Our vision is to be the bank that customers choose. Our Purpose and Values guide our behaviours, from how we connect with customers and the community to how we make decisions to, what we will achieve together.

Purpose Why we exist	BUILDING **SOCIAL CAPITAL** THROUGH BANKING.					
Values How we will work	 Spirited. **Be outrageously courageous.**	 Optimistic. **To infinity and beyond.**	 Curious. **Be truly, madly, deeply interested.**	 Inclusive. **Tap the collective genius.**	 Accountable. **Be the rubber that hits the road.**	 Lionhearted. **Be fiercely caring.**
Call to action	Be courageous, raise issues, actively listen and help address issues. Embed change.	Every challenge is an opportunity for us to do better.	Question and challenge – and provide ideas for solutions.	We all have a part to play. We are one team. Listen to our diverse voices.	Hold ourselves and each other to account for living our values. We are empowered and accountable to make good decisions. Deliver value for our stakeholders.	Be determined. Be bold. Be part of the change. Make a positive difference

Chosen by our customers.

Our vision is to be the bank customers choose and this requires us all to be laser focused on our customers. How we conduct ourselves determines how they see us. We aim to provide exceptional customer and people experiences.

Our customers appreciate that we are small enough to take the time to understand their needs and big enough to offer a range of products that are digitally enabled at competitive rates.

We endeavour to consider the economic, environmental and social sustainability of our customers and future customers. We do this by:

- taking time to develop products and services that are transparent, accessible and are easily understood.
- working closely with our customers to understand their needs and/or business.
- being respectful of the need for privacy and confidentiality.
- being clear and open about our risk appetite.
- conducting a comprehensive analysis throughout the credit decision and management process to identify potential issues; and
- ensuring our set of credit policies and practices identify any risks and issues.

We have a dedicated Customer Advocate team who operate independently from our business operations, ensuring our commitment to build customer relationships on trust and transparency. They exist to be a strong voice for our customers, ensuring they are heard, understood, and treated fairly. The Customer Advocate team helps us to make better decisions and challenges product and service fairness.

Values in Action

We will always strive to...

- ✓ Act fairly and ethically towards our customers.
- ✓ Only provide products and services that match our customers' needs and circumstances.
- ✓ Make our products and services transparent, accessible and easy to understand.
- ✓ Treat our customers with care and compassion.
- ✓ Communicate openly and simply with customers and respect their diverse needs, backgrounds and abilities.
- ✓ Only collect personal information from our customers that is necessary to provide products and services or abide by the law.
- ✓ Take extra care of customers who are at a greater risk of harm or loss because they are experiencing vulnerability.
- ✓ Listen and consider carefully feedback from customers.
- ✓ Take prompt and appropriate action to resolve customer complaints, problems and harm – including financial losses, distress and inconvenience - and remediate when we don't get it right.
- ✓ Identify potential unfair customer outcomes and ensure these are owned, actioned and/or escalated.
- ✓ Make sure our people have the skills to perform their roles including providing training and completing required accreditations.

...and we will never knowingly and intentionally

- ✗ Provide banking solutions that do not meet our customers' needs.
- ✗ Do something that risks the safety of a customer.
- ✗ Discriminate unlawfully against a customer.
- ✗ Allow improper access and use of confidential or personal information.
- ✗ Create additional distress for customers experiencing vulnerability through lack of empathy.

Key Group Policies & related documents

- Complaints Management Policy
- Customer Remediation Standard
- BOQ Group Customer Advocate Charter
- Acceptable Use Policy
- Operational Risk Management Framework
- Direct Marketing Policy
- Product Life Cycle Policy
- Product & Services Pricing Policy
- Disclosure & Communication Policy
- Diversity & Inclusion policy
- Modern Slavery Statement
- Privacy Policy
- Anti-Bribery and Corruption Policy



Connected to our community.

Being connected to the community is an integral part of BOQ Group's identity. It's core to our customer centric culture and supports our purpose of building social capital through banking.

We recognise that environmental and social issues impact our communities. We deliver social impact through community partnerships, strong relationships and investment in local markets. Our partnerships operate at a Group and grassroots level to support Australians through community empowerment, financial inclusion, funding research and community building in health, and empowering First Nations youth.

At BOQ Group, we hold a deep respect and care for our environment, our communities, and our surroundings. We're fully aware of the impact that climate change is having on our customers, people, suppliers, and in our communities. Therefore, we're committed to identifying and managing these environmental and social risks appropriately, striving for a healthy and sustainable planet, and the well-being of our communities.

We're committed to protecting our community and the integrity of the financial system through the prevention of illegal activity. This includes meeting our anti-bribery and corruption, and anti-money laundering and counter-terrorism financing obligations and managing fraud.

We only work with approved suppliers and business partners, and we take the utmost care to ensure that there is no slavery and slavery like practices, human trafficking and other forms of modern slavery in any part of our operations.

Values in Action

We will always strive to...

- ✓ Establish connections to our communities, building social capital as we do business.
- ✓ Be respectful, honest and transparent with our customers and community.
- ✓ Not accept bribery and corruption in any form.
- ✓ Prevent money laundering and terrorism financing with our systems and processes.
- ✓ Deliver social impact through community partnerships, strong relationships and investing in local markets/regions.
- ✓ Respect the cultures, customs and human rights of everyone we work with and report any abuses. This includes those who use our services or work for our business partners or suppliers.
- ✓ Care for our environment, our communities and our surroundings recognising the impact of climate change.
- ✓ Support environmental sustainability and help understand environmental impact.
- ✓ Manage environmental, social and governance risks as part of our business operations.
- ✓ Take reasonable steps to avoid any conflict of interest (actual, perceived or potential) and where necessary disclose details of the conflict.

...and we will never knowingly and intentionally:

- ✗ Do something that is unethical or harmful to the community.
- ✗ Tolerate any abuse of human rights, including modern slavery, child labour or human trafficking anywhere in our operation or supply chain.
- ✗ Fund activities that are associated with deliberate or wilful governance failures, misconduct, contribute to significant environmental harm, fail to comply with environmental regulation, or are associated with human rights abuse.

Key Group Policies & related documents

- Conflict of Interest Policy
- Service Provider Management Policy
- Modern Slavery Policy
- Sustainability Policy & Standard
- Sponsorship Policy & Guidelines
- Prohibited and Restrictions Industries & Activities Standard
- AML CTF Policy



Acting as one team.

At BOQ Group, we work as one team. In practice, this means adopting an enterprise-wide mindset, ensuring our workplace is safe, inclusive and respectful for everyone in order to deliver excellent customer service and lead change across our business

We value our differences and embrace the unique perspectives and ideas that come from our diversity. We celebrate, value and include people of all backgrounds, gender-identities and expressions, sexualities, cultures, bodies and abilities. We strive to provide a physically and psychologically safe environment for our people by having a workplace where employees can perform at their best. This includes being able to share diverse ideas and experiences and speak up against unethical or inappropriate behaviour.

Our goal is to create a culture of inclusion and belonging where everyone feels valued, respected and empowered. We do not tolerate bullying, harassment, inappropriate behaviour or conduct.

We live by our Values and put them into action every day. We all have a role to play in making sure that we follow the rules and speak up if we see something that's not right without the fear of retribution or victimisation.

Values in Action

We will always strive to...

- ✓ Act with care, diligence and in the best interests of BOQ Group, our customers and community.
- ✓ Behave in a professional manner with honesty and integrity, consistent with our Values.
- ✓ Comply with any lawful and reasonable directions.
- ✓ Follow health, safety and wellbeing practices including reporting hazards and incidents. Safety is everyone's responsibility, so we never walk by something we think may be unsafe. If we see it, it's our job to report it immediately.
- ✓ Treat psychological and mental health with the same level of importance as physical health.
- ✓ Make sure our people have the skills to perform their roles including providing training and completing relevant accreditations.
- ✓ Be fit to safely perform duties, unimpaired by drugs, alcohol, other substances or fatigue.
- ✓ Uphold BOQ Group's social, ethical, and behavioural standards.
- ✓ Take reasonable steps to avoid any conflict of interest (actual, perceived or potential), and disclose details of the conflict.
- ✓ Speak Up if you observe or become aware of behaviour or conduct which seems to be inconsistent with this Code.

...and we will never knowingly and intentionally:

- ✕ Tolerate bullying, discrimination, harassment or sexual harassment against any person.
- ✕ Act unprofessionally or disrespectfully to a colleague or customer.
- ✕ Conduct ourselves in a manner that causes damage to BOQ Group's reputation.
- ✕ Act dishonestly, which includes acts of theft or fraud, including deceit relating to timesheets or attendance.
- ✕ Irresponsibly or excessively consume alcohol while undertaking business.
- ✕ Consume or possess illegal drugs whilst in the workplace.
- ✕ Overlook something we think may be unsafe whether it's a physical or psychological risk.

Key Group Policies & related documents

- Accountability Policy
- Group Remuneration Policy
- Consequence Management Framework
- Workplace Behaviour Standard
- Work Health and Safety Policy
- Fit & Proper Policy
- Personal Due Diligence Standard
- Domestic and Family Violence Standard
- Acceptable Use Policy
- Leave Standard
- Speak Up Standard
- Drugs & Alcohol in the Workplace Standard
- Enterprise Agreement 2022



Leading with Impact.

At BOQ Group we recognise the potential within every person to influence outcomes, play a role in shaping a healthy and strong bank and creating a great culture.

We expect our People Leaders to be active in ensuring our Values are brought to life within their teams and through interactions with our customers and stakeholders. We recognise that how we lead people and how we achieve results matters and expect our leaders to lead by example.

We ask our People Leaders to commit to Care, Coach, and Call Out.

- **Care:** Demonstrate genuine care for our team members, recognising their value. Caring greatly for the outcomes we achieve for our customers.
- **Coach:** Work alongside and coach team members, providing feedback, and having courage in conversation that allows us to achieve strong outcomes, overcome obstacles and see our team members grow and develop.
- **Call out:** Call out when things don't seem right, and hold one another accountable for our standards, including those within this Code of Conduct. We expect our leaders to be active in creating environments where team members are able to speak up when things don't seem right, or where they believe a detrimental impact may be experienced by our employees, customers and shareholders.

How we think about leadership at BOQ Group
We consider leadership across several areas – these include leadership of self, team, business and enterprise. In practice, our leadership approach is focused on achieving these outcomes by actively encouraging and equipping our leaders to:

Lead Self
Demonstrate self-awareness and an understanding of the impact of our behaviour on others. Take responsibility for learning through a commitment to growing business, leadership capability, and displaying our Values.

Lead Team
Lead and manage with a view to inspire, engage, and empower team members as they seek to fulfil their responsibilities. Communicate purpose and implement strategy, leading change well and encouraging innovation, to build strong organisational culture. Committed to fostering a safe, respectful and inclusive workplace culture that values diversity and gender equality and where employees feel safe and able to speak up and ask questions.

Lead Business
Developing our People Leaders to ensure they make good decisions with a healthy risk mindset. Having an external perspective and anticipating the future needs of our customers, to deliver products and services to meet their needs. We ask leaders to be ever mindful of the ease with which our team members can create great outcomes for our customers, ensuring they are empowered to deliver, and considering how processes may be improved.

Enterprise Leadership:
Lead with BOQ Group in mind, fostering an enterprise mindset, and leveraging the power of the organisation's broader network. Aligning efforts toward a common goal of creating a high-performing organisation that always acts in the best interests of our customers, communities, employees and shareholders.

At BOQ Group, we lead to achieve great outcomes for our customers and stakeholders. We always put customer outcomes first, we value learning, and pursue our purpose of Building Social Capital Through Banking and living our Values.

As a Leader at BOQ Group we ask you to Lead by example. At all times, we expect our People Leaders to ensure themselves and their team members understand Our Code, apply it in practice, and hold each other to account if they breach the Code.

BOQ Leader Commitments:
At BOQ Group, we hold among our highest commitments, how we manage and lead our team members.

As Leaders, we will always strive to...
- ✓ demonstrate to team members we care, recognising the value of individuals.
- ✓ ensure team members are empowered, and processes optimised for great customer, team members and shareholder outcomes.
- ✓ committing to grow our capability as Leaders. We do this by engaging in opportunities to learn and develop, and by regularly seeking and acting on feedback.
- ✓ acknowledge we don't always get things right – we admit and take responsibility for our mistakes, calling out 'flick pass' behaviour.
- ✓ create environments where team members are able and equipped to challenge when things don't seem right, or where they believe a detrimental impact may be experienced by our employees, customers, and shareholders.
- ✓ achieve outcomes and actively engaging in candid and constructive conversation around individual, team and business performance.
- ✓ demonstrate an enterprise mindset, making decisions and demonstrating behaviours that elevate BOQ Group's Values and purpose.

Key Group Policies & related documents
- Recruitment & Selection Policy
- Consequence Management Framework
- Flexibility in the Workplace Standard
- Learning & Development Policy
- Workplace Behaviour Standard
- Accountability Policy



Making good decisions.

We all have a role in creating a strong risk culture, including taking accountability for our own actions. Our Values also guide our behaviours and how we deal with risk. Making good and ethical decisions builds trust among us and the people we interact with, including customers.

Our customers and communities trust and expect us to act with professionalism and integrity, just as we trust and expect each other to act ethically and with good judgement. Risk management is an integral part of our culture and ways of working.

Our policies and supporting documents are designed to assist in as many situations as possible. However sometimes, you may have to make a hard decision when there are no clear rules or steps to follow.

At BOQ Group we drive risk informed decisions. Better decisions make us more risk intelligent, resilient and drives continuous improvement. We are empowered to make better decisions. In practice, this means:

- Question: We promote curiosity and constructive challenge, encouraging employees to question the status quo and explore innovative solutions to strengthen our organisation and promote informed decision making.
- Evaluate: We evaluate risks and opportunities to ensure our decisions align with strategic objectives, support a robust control environment, and optimise operations for long-term success.
- Sense Making: We analyse data, synthesising information from diverse perspectives to make informed decisions. This enhances our risk management practices and supports our strategic goals, for cohesive organisational growth.
- Take Action: We take decisive actions to manage risks, set clear outcomes and strive for execution excellence, reinforcing accountability and driving BOQ towards our strategic goals.

Values in Action

We will always strive to...

- ✓ Know, understand, and manage our responsibilities, including the associated risks and obligations.
- ✓ Understand and work within BOQ Group's risk management framework and comply with policies, procedures and other supporting documents.
- ✓ Be proactive in identifying, considering and managing risk.
- ✓ Remain vigilant for new and unexpected risks and seek advice from appropriate experts.
- ✓ Be open to input from people with thinking different to our own and constructively challenge other's ideas.
- ✓ Take decisive actions to manage risks, set clear outcomes, and strive for execution excellence driving our organisation towards its strategic goals.
- ✓ Make informed decisions that are compliant and in the best interests of BOQ Group and customers.
- ✓ Be accountable for our actions and decision making.
- ✓ Speak up if something isn't right.

...and we will never knowingly and intentionally:

- ✗ Ignore our responsibilities and the risks that come with them.
- ✗ Fail to comply with BOQ Group's risk management framework, policies and supporting documents.
- ✗ Not seek feedback from other people who think differently from ourselves and not constructively challenge the ideas of others.
- ✗ Fail to raise concerns or Speak Up if something isn't right.

Key Group Policies & related documents

- Speak Up Standard
- BOQ Whistleblower Policy and Standard
- Risk Management Strategy
- Risk Appetite Statement (RAS) Standard
- Compliance Risk Management Framework
- Regulatory Relationships Policy



Working with integrity.

At BOQ Group, we are trusted to do the right thing and act with honesty, integrity and due care in all our interactions. We take accountability for identifying, managing and reporting all forms of risk, including compliance and conduct.

By engaging with our customers, stakeholders and regulators in a timely, accurate and consistent way, we build trust and protect the Group. We deliver sustainable outcomes via disciplined performance excellence. Reporting accurately and in a timely manner ensures we maintain the trust of our colleagues, customers, stakeholders and shareholders and enhances our reputation.

All employees must avoid situations where their personal interests or relationships could conflict with BOQ Group's interests or those of our customers and stakeholders. A conflict of interest is any relationship or situation where personal interests may, or be perceived to, influence performance or personal gain.

We strive to protect our community and the integrity of the financial system through strong financial crime risk management that includes anti-bribery and corruption, anti-money laundering and counter-terrorism financing obligations.

We responsibly invest in our business relationships and do not receive or offer gifts that could improperly influence people. These actions can create conflicts of interest, be seen as a form of bribery or corruption, or raise questions about our judgement.

We trust, and hold to account, our partners and suppliers to work with integrity and help us create positive social and economic impacts by abiding by our Supplier Code of Conduct.

Values in Action

We will always strive to...

- ✓ Act with integrity, honesty, respect and be courteous to all.
- ✓ Report matters accurately and in a timely manner, including those that relate to compliance and conduct risks.
- ✓ Make every effort to avoid conflicts of interest. Actual or potential conflicts of interest must be reported immediately.
- ✓ Act in a bi-partisan manner with respect to political parties and political stakeholders.
- ✓ Protect the confidentiality and security of information you see or receive whilst working at BOQ Group and use it only for the proper purposes.
- ✓ Ensure information gained through employment is not used for personal gain or the benefit of others (publicly available or not).
- ✓ Take care when receiving and giving gifts and hospitality. These are subject to restrictions, approval and recording requirements.
- ✓ Conduct business only with reputable third parties with funds derived from legitimate sources for legitimate business purposes.
- ✓ Ensure our suppliers work with integrity and uphold our values and standards.

...and we will never knowingly and intentionally:

- ✕ Fail to report and record conflicts of interest.
- ✕ Do anything fraudulent or dishonest, such as falsifying records, misrepresenting facts, misappropriating BOQ Group's customer assets or engaging in any other fraudulent behaviour.
- ✕ Engage in unconscionable conduct including taking advantage of a person or group that suffers from a disability or disadvantage – including age or lack of education.
- ✕ Accept, offer or promise a bribe or unlawful inducement to anyone.
- ✕ Engage in any activity that conceals or disguises the nature, location, source, ownership or control of funds.
- ✕ Accept any gift, benefit or hospitality if it is aimed at influencing a business relationship or decision unfairly or illegally.
- ✕ Ignore or fail to report any activity that is potentially suspicious or unusual and any crime in general, that could indicate money laundering or terrorism funding activities.
- ✕ Allow unfair competition, market abuse, harmful market behaviour, insider trading, poor conflict management, bribery and corruption.

Key Group Policies & related documents

- Conflict of Interest Policy
- Securities Trading Policy
- Expense Policy
- Anti-Bribery and Corruption Policy
- External Communications Policy
- Remuneration Policy
- Consequence Management Framework
- Workplace Behaviour Standard
- Service Provider Management Policy
- Supplier Code of Conduct
- Sustainability Policy & Standard
- Regulatory Relationships Policy



Protecting our bank & respecting information.

Everyone working for or on behalf of the BOQ Group is expected to respect, secure, protect, and care for BOQ's assets. This includes company and personal information. Inappropriate use of technology or data may expose the Group to risks and vulnerabilities. Maintaining information security and privacy are integral to trust in our brand.

BOQ Group strives to keep information secure and protect this information from unauthorised access and disclosure. Employees with access to sensitive information must not disclose to unauthorised parties and must act in accordance with legal and regulatory requirements.

Only authorised spokespeople can approve and release information to the public. This includes social media activity that can be linked to you and BOQ Group.

Values in Action

We will always strive to...

- ✓ Adequately safeguard and maintain the information of our people, customers, and stakeholders against unauthorised or unlawful access, use, handling, modification, sharing, loss, interference, destruction or damage.
- ✓ Collect only the required amount of sensitive (including personal) information legitimately necessary.
- ✓ Comply with our legal and regulatory obligations including those relating to privacy and information security.
- ✓ Ensure sensitive information is not accessed or shared unless authorised and required including market sensitive information that could result in insider trading.
- ✓ Protect BOQ Group's assets including intellectual property and use them for their intended purpose.
- ✓ Respect the intellectual property rights of others (including suppliers and competitors).
- ✓ Use technology in a safe, secure, and productive way.
- ✓ Educate our colleagues on privacy and information security and understand our associated policies and procedures.
- ✓ Communicate with the public responsibly and only when authorised to do so and report media and investor/analyst inquiries to Corporate Affairs and Investor Relations.
- ✓ Know and understand how BOQ Group's social media policy applies to all employees.
- ✓ Speak up immediately if misconduct is observed or suspected and report any actual or suspected irregularities or weaknesses in internal controls, accounting, or reporting.

...and we will never knowingly and intentionally:

- ✗ Do something that breaches law or regulatory obligations and/or BOQ Group's policies and supporting documents.
- ✗ Fail to take due care with customers' information and disclose this inappropriately.
- ✗ Improperly use market sensitive information or your role, to gain, or seek to gain, a benefit or an advantage for you or any other person; or to cause, or to seek to cause, detriment to BOQ Group, or any other person or customer.
- ✗ Improperly use BOQ Group assets or intentionally cause BOQ Group a loss.
- ✗ Allow unauthorised access to BOQ Group assets, technology, and systems.
- ✗ Falsify, misappropriate, or improperly alter any record or make a false or misleading entry including omitting any information.
- ✗ Trade relevant securities of BOQ Group, either directly or indirectly, while you are in possession of market sensitive information.
- ✗ Post anything on social media that refers to BOQ Group and is obscene, defamatory, threatening, harassing, discriminatory, or hateful to any person, group, or entity.

Key Group Policies & related documents

- BOQ Group Acceptable Use policy
- Privacy Policy
- Securities Trading Policy
- Regulatory Relationships Policy
- Risk Event and Breach Management Standard
- BOQ Data Risk Management Framework
- BOQ Group Information Security Policy
- External Communications Policy
- Speak Up Standard
- BOQ Whistleblower Policy and Standard



Taking action. Speaking up.

At BOQ Group, we are all accountable for complying with Our Code and have the courage to call things out when they don't seem right. Additionally, we value continuous learning and improvement, which means that we admit mistakes when they happen, talk about and learn from those mistakes.

Living our Values means that everyone feels safe to speak up if they suspect or observe unethical, inappropriate or discriminatory behaviour including feeling pressured to act in a way that is inconsistent with our Values, our Code or BOQ Group policies.

We are committed to having a workplace where all employees feel safe to share their opinions and Speak Up.

How to speak up
While working at BOQ Group, you might find something that doesn't feel right If you're ever concerned that something may be illegal, unethical, unacceptable or improper, we trust you to use your judgement and to speak up honestly and constructively about your concerns.

We know this takes courage, but you should know we've got your back. We're here to support each other, and there is no tolerance for anyone who retaliates against an employee for speaking up.

Every concern matters. Even if you're unsure about the situation or don't have all the evidence, your concern is enough to start the conversation. You are encouraged to speak to your manager about your concerns. Contact the Whistleblower Coordinator at whistleblowing@boq.com.au or contact the BOQ Group external whistleblowing service on **1800 945 200** or BOQwhistleblowing@deloitte.com.au

Values in Action
We will always strive to...
- ✓ Treat every report of a potential breach of Our Code sensitively and respectfully.
- ✓ Support anyone to feel safe when speaking up. No one should feel threatened, intimidated, harassed, excluded or humiliated.
- ✓ Be open and honest and provide as much information as possible when raising a concern.
- ✓ Abide by confidentiality requirements if you are involved in an investigation or matter.
- ✓ Protect whistleblowers from detriment.
- ✓ Uphold legal protections for eligible whistleblowers.

...and we will never knowingly and intentionally:
- ✕ Engage in retaliation or detrimental conduct towards someone because they or someone else has, intends to or is suspected of speaking up.
- ✕ Lie to, or mislead an investigator.
- ✕ Take steps to identify an anonymous reporter.

What happens if the Code is breached?
Abiding by Our Code is important. Breaches of Our Code undermine the trust of our customers, communities, stakeholders and our people. Breaches of Our Code could cause damage to BOQ Group's reputation.

A breach is the act of breaking or failing to follow Our Code. Any allegation that Our Code has been breached will be investigated and handled discreetly and sensitively. There are serious consequences if the Code is breached. We'll respond fairly and justly and take time to understand the intent and actions of our people in part of the Code has been breached, knowing that not every breach is intentional.

We take breaches of Our Code very seriously, and they may result in consequences.

Key Group Policies & related documents
- BOQ Whistleblower Policy and Standard
- Speak Up Standard
- Risk Event and Breach Management Standard
- Workplace Behaviour Standard
- External Communications Policy



BOQ GROUP

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