

NFCU Bank Good Conduct and Ethical Behaviour Charter

We are an organisation steeped in tradition, with values centred around our Members that have guided our people since our formation. Our values align to our mutual society origins, place an emphasis on integrity and member interests, and provide a foundation for ensuring good outcomes for all our customers. At NFCU Bank, we expect the highest standards of ethical behaviour, model this behaviour and hold everyone, including Directors, Executives, employees and contractors, accountable for delivering these standards throughout the organisation. Our Good Conduct and Ethical Behaviour Charter ("Charter") describes these standards and provides a set of guiding principles to help us bring our values to life.

The Board and the Executive Team fully support the Charter and actively monitor adherence to it. Everyone at NFCU Bank is accountable for acting ethically at all times. If you do not adhere to any aspect of the Charter, you may face disciplinary action, including termination of your employment.

Poor conduct could result in unsuitable or unfair outcomes for our customers and members, undermine market integrity and cause irreparable damage to our reputation. That is why everyone has a responsibility to raise any concerns about inappropriate or unethical behaviour, or activities taking place within the organisation. Our Breach Management and Whistle-blower Policies outline the processes for reporting breaches or suspected breaches of the Charter, laws or policies, by anyone within the organisation. The Whistle-blower Policy also explains how we respond to and support those who report wrongdoing and provides a means for reporting concerns anonymously.

Principles

The following principles complement our Values, policies and standards and provide guiding examples of the behaviour expected of everyone at NFCU to ensure good outcomes for our customers, employees and stakeholders:

- We act with honesty, integrity and fairness
- We are competent and professional
- We comply with laws, regulations, voluntary codes and our policies
- We identify, manage and disclose conflicts of interest • We respect and do not misuse property and information
- We are one team.

We act with honesty, integrity and fairness

Doing what's right means acting with integrity. We maintain the highest standards of integrity in all our professional dealings, we communicate honestly and treat our members and each other fairly. This means:

- Not participating in any activity that could mislead or deceive our members or other stakeholders
- Not making false, misleading or unsubstantiated representations
- Listening to what our members want and providing products and services that are appropriate to their needs and that they understand
- Communicating clearly and effectively, providing transparent and consistent information about our business and the products and services we provide, including fees and charges
- Maintaining clear and accurate business records.

We are competent and professional

We have the knowledge, skills and capability to provide appropriate products and services, and meet professional standards of care. This means:

- Completing all mandatory education and training requirements within the prescribed timeframes
- Maintaining a professional development plan and undertaking continuing professional development, in line with industry standards and regulatory requirements
- Only providing advice that you are qualified and authorised to provide
- Ensuring customer complaints are managed appropriately
- Being accountable for your actions and behaviour
- Behaving appropriately at work and at work-related functions.

We comply with laws, regulations, voluntary codes and our policies

We identify, manage and disclose conflicts of interest

As a mutual, good outcomes for our customers are integral to our business strategy. We do not put our personal or organisations interests ahead of our members' interests and we are open and transparent about our relationships with third-parties. This means:

- Not soliciting, accepting or offering financial inducements, gifts, favours, entertainment or bribes which might influence or be seen to influence your professional judgement
- Not processing your own transactions or those of relatives or business associates
- Disclosing any material interest you have outside of NFCU Bank and not participating in business activities outside your employment that could adversely affect your ability to carry out your duties and responsibilities
- Obtaining approval from senior management before accepting a directorship on the board of a non-NFCU Group entity.

We respect and do not misuse property and information

As a bank, the nature of our business can involve handling funds, property and private and confidential information relating to NFCU Bank, our members and other stakeholders. We are a trusted organisation and its important that we maintain that trust. Therefore, it is imperative that we respect privacy and confidentiality and only use funds, property and information for proper purposes. This means:

- Not using NFCU or members' funds, property or information for personal benefit, or to cause detriment to NFCU or our members, or help others to do so
- Not using or disclosing private or confidential information, except if authorised to do so and the use or disclosure is permitted by law. This includes confidential information concerning NFCU Bank or any of our subsidiaries, such as strategic information.

These obligations continue even after you leave NFCU Bank.

We are one team

We work collaboratively to build strong relationships across NFCU Group; working as "One Team" to achieve good outcomes for our members and each other. This means:

- Treating each other with respect and valuing each other's differences;
- Not tolerating bullying, harassment, unlawful discrimination or any other offensive conduct
- Supporting and not undermining each other
- Collaborating with colleagues to do what is right.