



Bank of Queensland Fit and Proper Policy

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1. Overview

Bank of Queensland Limited and its subsidiaries (the Group) are committed to meeting the Group's obligations under Australian Prudential Regulation Authority (APRA) prudential standards, in particular APRA Prudential Standards APS 520, GPS 520 and LPS 520 - Fit and Proper requirements.

People acting in Responsible Person Positions are required to possess the competence, character, diligence, honesty, integrity and judgement to perform properly the duties of that position. Accordingly the Group must prudently manage the risk to its business or financial standing that persons acting in Responsible Person Positions are not fit and proper.

The purpose of this policy is to set out the Group's approach to the assessment of the fitness and propriety of persons who hold, or who are to be appointed or elected to, a Responsible Person Position. This policy has been implemented in compliance with APS 520, GPS 520 and LPS 520, which require each Regulated Group Member to have a written policy in relation to the assessment of the fitness and propriety of its responsible persons.

In implementing this policy, the Group has had regard to the guidance provided by Prudential Practice Guides APG 520, GPG 520 and LPG 520 - Fit and Proper.

This policy forms part of the Group's risk management system and risk management strategy as required under APRA Prudential Standards APS 310 Audit and Related Arrangements for Prudential Reporting, GPS 220 Risk Management and LPS 220 Risk Management.

This Policy has been approved and adopted by the Board of each Regulated Group Member.

2. Responsibility

2.1 Board Commitment and Responsibility

The application of this policy and the assessment of the fitness and propriety of responsible persons is the responsibility of the Board. However, the Board may, in accordance with this policy, delegate all or some of its functions to a committee of the Board or to particular officers or employees of the Regulated Group Member.

The Board is committed to ensuring that each person who holds a Responsible Person Position has the appropriate skill and experience commensurate with the role that they hold, and will make all final determinations on the fitness and propriety of responsible persons.

2.2 Board Risk Committee Responsibility

As this policy is a component of the Group's risk management system and relates to compliance with APRA prudential standards, the Board has delegated general responsibility for implementing the policy to the Board Risk Committee.

This policy will be reviewed by the Risk Committee at least annually with any modifications to be referred with recommendations to the Board.

The Risk Committee is:

- a. responsible for ensuring that all individuals and committees who have responsibility under this Fit and Proper Policy fulfil their responsibilities in a timely and diligent manner;
- b. with the assistance of the Company Secretary of the relevant Regulated Group Member, responsible for the assessment in relation to responsible auditors, and providing recommendations to the Board on these matters; and
- c. with the assistance of the Company Secretary of the relevant Regulated Group Member, responsible for the assessment in relation to responsible actuaries, and providing recommendations to the Board on these matters.

2.3 Nomination Committee Responsibility

The Nomination Committee (with the assistance of the GM Human Resources and the Company Secretary of the relevant Regulated Group Member) is responsible for the assessment of existing directors or candidates for nomination or appointment as a director of a Regulated Group Member, and making recommendations to the Board on these matters.

2.4 Human Resources Responsibility

The GM Human Resources and the Company Secretary are responsible for applying this policy. The GM Human Resources is responsible for:

- a. ensuring that appropriate fit and proper assessments are carried out for each responsible person;
- b. making submissions about any matters that are relevant to a particular assessment of a responsible person's fitness and propriety;
- c. providing information to the Risk Committee on matters concerning the procedure for fit and proper assessments; and
- d. ensuring that the Group takes all reasonable steps to protect the information and documents collected for fit and proper assessments from misuse, unauthorised access, modification or disclosure.

2.5 Company Secretary Responsibility

The Company Secretary is responsible for:

- a. ensuring that matters related to this policy are brought to the attention of the Risk Committee; and
- b. ensuring that appropriate reporting as required by the Banking Act, Insurance Act, Life Act, Corporations Act or APRA's prudential standards and guidance is completed.

3. Application of the policy

3.1 Definition of a responsible person

This policy applies to all persons who hold, or are to be appointed or elected to, a Responsible Person Position in the Group. A responsible person is:

- a. a director of a Regulated Group Member (**Director**);
- b. a senior manager of a Regulated Group Member as defined in section 3.2 of this policy (**Senior Manager**);
- c. an Auditor of a Regulated Group Member;
- d. the Appointed Actuary and Reviewing Actuary of a General Insurance Company;
- e. the Appointed Actuary of a Life Insurance Company;
- f. a person who performs activities for a subsidiary of a Regulated Group Member where those activities may materially affect the whole, or a substantial part, of the Regulated Group Member's business, or its financial standing, either directly or indirectly; or
- g. any other person where APRA has determined that that person plays a significant role in the management or control of the Regulated Group Member, or that the person's activities may materially impact on prudential matters.

A responsible person need not be an employee of the Regulated Group Member, and may be a consultant, contractor or employee of a subsidiary or otherwise related company of the Regulated Group Member.

3.2 Senior Managers

The following persons will be taken to be Senior Managers of the Group (other than those persons who are Directors):

- a. a person who makes, or participates in making, decisions that affect the whole, or a substantial part, of a Regulated Group Member's business;
- b. a person who has the capacity to affect significantly the financial standing of a Regulated Group Member;
- c. a person who may materially affect the whole, or a substantial part, of the Regulated Group Member's business, or its financial standing through their responsibility for:
 - (i) enforcing policies and implementing strategies approved by the Board;
 - (ii) developing and implementing processes or systems that identify, assess, manage, or monitor risks in relation to business activities and operations of the Regulated Group Member; or
 - (iii) monitoring the appropriateness, adequacy or effectiveness of risk management systems.

3.3 Required notification

The GM Human Resources must keep and maintain a current list of all Responsible Person Positions and responsible persons in addition to details of the competencies and training required for each Responsible Person Position. The Risk Committee must approve the list of Responsible Person Positions maintained by the GM Human Resources and any changes to that list.

As soon as possible after a person is nominated or proposed for election or appointment to a Responsible Person Position, the Regulated Group Member will make available to that person a copy of this policy and the details of the competencies and training required for the relevant Responsible Person Position. This policy will also form part of the induction process for all responsible persons.

The Regulated Group Member will also take reasonable steps to ensure that each responsible person is aware of, and fully understands this policy, and receives a copy of the policy before any assessment of their suitability to hold a responsible person position is conducted.

4. Criteria to determine if a responsible person is fit and proper

The criteria for assessment of responsible persons is divided into three sections, as follows:

1. section dealing with all responsible persons including those within the Group such as Directors or Senior Managers;
2. section dealing with additional requirements for Auditors; and
3. section dealing with additional requirements for Appointed Actuaries and Reviewing Actuaries.

4.1 Responsible persons generally

A person must satisfy the following criteria to be considered fit and proper to hold a Responsible Person Position:

- a. it is prudent for the Regulated Group Member to conclude that the person possesses the competence, character, diligence, honesty, integrity and judgment to perform properly their duties;

- b. the person is not disqualified under the Banking Act, Life Act, Insurance Act or Corporations Act from holding their particular position; and
- c. the person does not have a conflict of interest in performing the duties of the Responsible Person Position or, if there is a conflict of interest, it is prudent for the Regulated Group Member to conclude that the conflict will not create a material risk that the person will fail to perform properly the duties of the position.

4.2 Matters for consideration in conducting fit and proper assessments

To ensure that the criteria in paragraph 4.1 above are satisfied, the Regulated Group Member will consider the nature and extent of a number of matters in conducting fit and proper assessments, unless there is good reason not to do so in a particular case. Such factors will include, but not be limited to:

- a. The person's character, competence and experience relative to the duties involved, including whether the person:
 - i. possesses the necessary skills, knowledge, expertise, diligence and soundness of judgment to undertake and fulfil the particular duties and responsibilities of the particular position; and
 - ii. has demonstrated the appropriate competence and integrity in fulfilling occupational, managerial or professional responsibilities previously or in their current position; and
- b. whether the person:
 - i. has demonstrated a lack of willingness to comply with legal obligations, regulatory requirements or professional standards, or been obstructive, misleading or untruthful in dealing with regulatory bodies or a court;
 - ii. has breached a fiduciary obligation;
 - iii. has perpetrated or participated in negligent, deceitful, or otherwise discreditable business or professional practices;
 - iv. has been reprimanded, or disqualified, or removed, by a professional or regulatory body in relation to matters regarding the person's honesty, integrity, or business conduct;
 - v. has seriously or persistently failed to manage personal debts or financial affairs satisfactorily in circumstances where such failure caused loss to others;
 - vi. has been substantially involved in the management of a business or company which has failed, where that failure has been occasioned in part by deficiencies in that management;
 - vii. is of bad repute in any business or financial community or any market; or
 - viii. has been the subject of civil or criminal proceedings or enforcement action, in relation to the management of an entity, or commercial or professional activities, and which reflected adversely on the person's competence, diligence, judgement, honesty or integrity.

Notwithstanding these factors, it remains a matter for the Board to make the final decision as to whether or not a person is fit and proper to hold a Responsible Person Position. This decision is subject to APRA's powers under the Banking Act, Insurance Act or Life Act to disqualify a person from being a responsible person or directing that they be not appointed or removed from a position.

4.3 Auditors

An Auditor must satisfy the criteria set out in paragraph 4.1 above and, in addition, the auditor must:

- a. be registered as an auditor under the Corporations Act;
- b. be ordinarily resident in Australia;

- c. be a member of a recognised professional body; and
- d. have a minimum of 5 years' relevant experience in the audit of authorised deposit taking institutions, general insurance companies or life insurance companies (as applicable to the particular Regulated Group Member to which the person is to act as Auditor) and, considering the relevance and recency of that experience, it would be prudent to conclude that the person is familiar with current issues in the audit of authorised deposit taking institutions, general insurance companies or life insurance companies (as applicable to the particular Regulated Group Member).

An Auditor of an Insurance Company must also satisfy the following additional criteria:

- a. the auditor is not the Appointed or Reviewing Actuary of the Insurance Company (as applicable);
- b. the auditor is not an employee or director of an entity of which the Appointed Actuary is an employee or director (as applicable); and
- c. the auditor is not a partner of the Appointed Actuary.

The Board may determine that there are special circumstances which make it appropriate that a particular person be appointed or continue as an Auditor without fulfilling the requirements of paragraph 4.3 above, provided it has properly notified APRA of those circumstances and the eligibility criteria not satisfied, and APRA has confirmed in writing that it has no objection to the appointment.

4.4 Appointed Actuaries and Reviewing Actuaries of Insurance Companies

An Appointed Actuary and Reviewing Actuary of an Insurance Company must satisfy the criteria set out in paragraph 4.1 above and, in addition, the actuary must:

- a. have appropriate formal qualifications;
- b. not be:
 - i. the Chief Executive, Managing Director, nor a director of the Insurance Company or a related body corporate (except where that related body corporate is a subsidiary of the Insurance Company); or
 - ii. the Auditor (a Reviewing Actuary may, however, be from the same firm or company as the Insurance Company's Appointed Actuary or from a related firm or related company); or
 - iii. for an Appointed Actuary, an employee or director of an entity of which the Auditor is an employee or director; or
 - iv. for an Appointed Actuary, a partner of the Auditor; or
 - v. for a Reviewing Actuary, an employee of the Insurance Company and, where the Appointed Actuary is not an employee of the Insurance Company, the Reviewing Actuary must not be an employee or director of the same firm or company as the Appointed Actuary or from a related firm or related company or a partner of the same firm or related firm as the Appointed Actuary;
- c. have a minimum 5 years relevant experience in the provision of actuarial services to entities carrying on a general insurance business or life insurance business (as applicable), and it would be prudent to conclude that the person is familiar with current issues in the provision of actuarial services to those companies (as applicable);
- d. be a Fellow or Accredited Member of the Institute of Actuaries of Australia; and
- e. be ordinarily resident in Australia.

For an Appointed Actuary, the Regulated Group Member should also consider whether there is a risk that the independent professional judgement of the Appointed Actuary may be unduly influenced.

The Board may determine that there are special circumstances which make it appropriate that a particular person be appointed or continue as an Actuary without fulfilling the requirements of paragraph 4.4 above, provided it has properly notified APRA of those circumstances and the eligibility criteria not satisfied, and APRA has confirmed in writing that it has no objection to the appointment.

5. Process for fit and proper assessments

5.1 When will assessments be conducted

Generally, assessments of a person's fitness and propriety for a Responsible Person Position must be made:

- a. before the person is appointed; and
- b. after their appointment, on an annual basis, although if material information adverse to the assessment becomes known to the Regulated Group Member during the year, the Regulated Group Member must take steps without waiting for the annual performance review.

An assessment need not be made before appointment if the person will hold the Responsible Person Position because of a resolution of members of the Regulated Group Member, for example the election of a director at a general meeting, or if APRA determines that a particular person is a responsible person and the Regulated Group Member had not previously considered that person a responsible person. In any such case, an assessment must be completed within 28 days of appointment to the Responsible Person Position. However, the Board may:

- a. carry out a full assessment of any person who is nominated for election as a director by the Board before that nomination is made; and
- b. carry out a preliminary assessment of any person who is nominated for election as a director.

A Regulated Group Member will only carry out a limited fit and proper assessment (as opposed to a full assessment) if a person is acting in a Responsible Person Position on an interim basis for less than 90 days. This limited fit and proper assessment will be conducted prior to making the interim appointment, and the Regulated Group Member will take all reasonable steps to assess the fitness and propriety of the person, including (at a minimum) obtaining attestations or representations from the person relating to some or all of the matters in paragraph 4.2, before the interim appointment is made. The interim appointment may be extended beyond 90 days without a full fit and proper assessment with APRA's agreement. Prior to appointing the person to the Responsible Person Position on a permanent basis, a full fit and proper assessment must be completed.

5.2 Process of assessment and review

Assessments of fitness and propriety are to be built into:

- a. the Board's and the Nomination Committee's procedures for considering candidates for nomination or appointment as a Director;
- b. the Board's and the Risk Committee's procedures for considering candidates for appointment as an Auditor of a Regulated Group Member;
- c. the Board's and the Risk Committee's procedures for considering candidates for appointment as an Appointed Actuary or Reviewing Actuary of a Regulated Group Member; and
- d. the Group's recruitment and promotion processes for other Responsible Person Positions.

5.3 Process of assessment for nomination and appointment of directors

The Nomination Committee, with the assistance of the GM Human Resources and the Company Secretary of the relevant Regulated Group Member, is responsible for gathering information for assessments in relation to:

- a. existing Directors; and

- b. candidates for nomination or appointment as a Director.

That information is to be assessed by the Nomination Committee and provided to the Board together with any recommendations.

5.4 Process of assessment for nomination and appointment of Auditors

The Risk Committee, with the assistance of the Company Secretary of the relevant Regulated Group Member, is responsible for gathering information for assessments in relation to an Auditor. That information is to be assessed by the Risk Committee and provided to the Board together with any recommendations.

5.5 Process of assessment for nomination and appointment of Responsible Actuaries

The Risk Committee, with the assistance of the Company Secretary of the relevant Regulated Group Member, is responsible for gathering information for assessments in relation to an Appointed Actuary or Reviewing Actuary. That information is to be assessed by the Risk Committee and provided to the Board together with any recommendations.

5.6 Process of assessment for nomination and appointment of responsible persons generally

The GM Human Resources is responsible for gathering information for assessments in relation to existing responsible persons or candidates for appointment to a Responsible Person Position, other than those referred to in paragraphs 5.3, 5.4 and 5.5 above.

That information is to be assessed by the Managing Director, with the assistance of the GM Human Resources, and provided to the Board together with any recommendations.

Any person conducting an assessment may seek further information from, or clarify any matter or information with, the person who is the subject of the assessment.

5.7 Information to be obtained

For appointments to Responsible Person Positions, unless there is good reason not to do so, the Regulated Group Member will obtain:

- a. a declaration by the candidate relating to the criteria in paragraph 4.2 above that APRA requires or recommends that the Regulated Group Member consider when making an assessment of fitness and propriety;
- b. in addition to the above, the declaration is to include that there are no legal actions current or pending against the candidate; that none of the candidate's personal and business tax returns are overdue; and that there are no current or pending ATO actions or liabilities that are unlikely to be satisfactorily resolved;
- c. an assessment of the candidate's competence against the details of the competencies and training required for the Responsible Person Position, which may be in the form of a self-assessment questionnaire or otherwise in the form of requests for information regarding the person's qualifications and experience;
- d. appropriate public record checks including:
 - i. criminal history checks;
 - ii. ASIC check to determine if the applicant is an authorised representative of another Australian Financial Services licensee (AFSL) or a credit representative of another Credit Licensee;
 - iii. ASIC check to determine if the applicant is the subject of any banning order or disqualification (which includes persons disqualified from managing corporations, banned

- securities representative pre AFSL, banned futures representatives, and banned and disqualified persons – AFSL);
- iv. ASIC check to determine if the applicant has given an enforceable undertaking to ASIC;
- v. commercial credit reference checks and bankruptcy checks;
- vi. in the case of an auditor or actuary, ASIC register of disqualified persons;
- vii. checks of relevant sanction lists;
- viii. ASIC check of directorships and significant shareholdings;
- ix. such other checks, including any relevant overseas checks, as are prudent from time to time;
- e. interviews and information from referees or other persons deemed suitable for that purpose by the Regulated Group Member; and
- f. such other information as is prudent in particular circumstances.

Enquiries need not be made about matters that are unlikely to be material.

The Group recognises that some of the information that it will gather is sensitive information under the Privacy Act 1988. It will be a condition of appointment that the candidate provides consent for this information to be gathered and used by the Group for the purpose of the assessment. The consent must also include consent for the information to be provided to APRA, if necessary.

5.8 Annual assessments

The GM Human Resources, with the assistance of the Company Secretary, will schedule annual assessments of responsible persons.

Unless special circumstances apply, such as absence on leave or similar matters, a responsible person's annual assessment should be conducted not more than 13 months after their previous annual assessment or assessment on appointment.

The Regulated Group Member will gather the following information as part of an annual assessment, unless there is good reason not to do so:

- a. general information from the person's performance review and human resources record;
- b. a declaration by the responsible person relating to the criteria in paragraph 4.2 above that APRA requires or recommends that the Regulated Group Member consider when making an assessment of fitness and propriety, to the effect that the criteria continues to be satisfied;
- c. in addition to the above, as per paragraph 5.7 (b), the declaration is to include that there are no legal actions current or pending against the candidate; that none of the candidate's personal and business tax returns are overdue; and that there are no current or pending ATO actions or liabilities that are unlikely to be satisfactorily resolved;
- d. information on the responsible person's competence against the details of the competencies and training required for the Responsible Person Position, which may be in the form of a self-assessment questionnaire or a request for information regarding changes in the person's qualifications or experience in relation to their position;
- e. information on any adverse matters such as disciplinary action both internal and external to the Group, investigations, offences, prosecutions or other relevant matters;
- f. updated public record checks as set out in paragraph 5.6 (c) above for candidates; and
- g. such other information as is prudent in the particular circumstances.

Enquiries need not be made about matters that are unlikely to be material.

It will be a condition of continuing appointment that the candidate provide their consent for this information to be gathered and used by the Group for the purpose of the assessment. The consent must also include consent for the information to be provided to APRA, if necessary.

6. Decision standards for fit and proper assessments

6.1 Fitness and propriety considerations

The Regulated Group Member must apply prudent judgement in determining whether the person could be considered fit and proper for the Responsible Person Position, and need not make enquiries about matters that are unlikely to be material.

If insufficient information is available to enable the Regulated Group Member to prudently conclude that the criteria in paragraph 4 above are met, particularly as a result of lack of co-operation by the person, then the criteria are deemed not to be satisfied.

Where a disclosure or matter is relevant, it should be considered in conjunction with other relevant matters, such as materiality, elapsed time since the event, and repetition or duration of the behaviour.

Notwithstanding that a person may be assessed as unfit for a particular Responsible Person Position as a result of a lack of competence for that position or because of a conflict of interest that applies to the duties of that position, the person may still be fit and proper for another Responsible Person Position as different competencies or conflict of interest considerations may apply to that position.

Where a person is found not to be fit and proper due to a lack of diligence, honesty, integrity, or judgement, then that person will not normally be suitable for any other Responsible Person Position.

7. Adverse finding on assessment

If an adverse finding is made such that a person is assessed to be not fit and proper to hold a Responsible Person Position:

- a. A person, whose appointment to that Responsible Person Position is subject to a fit and proper assessment, must not be appointed to that Responsible Person Position; and
- b. A person, who is currently acting in a Responsible Person Position, must not continue to hold that Responsible Person Position.

Where an assessment is carried out on a responsible person who is a Director or employee of:

- a. the Regulated Group Member; or
- b. a related entity of the Regulated Group Member,

and the person or committee responsible for the assessment forms the view on the basis of information available to them ("**Information**") that the person may not meet the criteria to be fit and proper to hold that Responsible Person Position, that person or committee must provide the Information to:

- a. the Risk Committee; and
- b. the person being assessed (the "**Person**").

The Risk Committee will permit the Person a reasonable time to respond to the Information. The Risk Committee must consider the Information and any response received from the Person, in considering whether or not the Person is fit and proper to hold the Responsible Person Position and make a recommendation to the Board. The Board's determination is final.

The Regulated Group Member may suspend the Person from duties until the Board has made the determination.

7.1 Action when a person is not fit and proper

If the Board makes a determination that a person is not fit and proper, then the Board may take such action as is appropriate, which may include:

- a. determining not to appoint that person to a Responsible Person Position;
- b. reassigning that person to a position which is not a Responsible Person Position or which is a Responsible Person Position for which they meet the fit and proper criteria;
- c. if a contract of employment or appointment applies, dealing with that person in accordance with that contract which, in appropriate circumstances, may include termination of employment or appointment;
- d. removing that person from the Responsible Person Position or, if the person is a Director, notify that person that an adverse assessment has been made and that the person must not continue to hold office, in which case the provisions of the Constitution and the Corporations Act will apply.

Where there are no effective steps prudently available, to ensure that the person does not continue to hold the position, the Regulated Group Member may consider taking steps to facilitate APRA independently considering the person's fitness and propriety. However, this in itself would not satisfy the Regulated Group Member's obligations to notify APRA of information as required under the APRA Prudential Standards.

7.2 When a responsible person is no longer fit and proper

If a responsible person has been assessed as fit and proper but the Regulated Group Member subsequently becomes aware of information that may result in the person being assessed as not fit and proper, the matter is to be referred to the Risk Committee which must take reasonable steps to ensure that the Regulated Group Member can prudently conclude that no concern over fitness or propriety exists. Where the Risk Committee decides that a concern exists, the GM Human Resources must cause a full assessment to be conducted.

If the responsible person becomes aware of any matter which may prevent the person from continuing to be assessed as a fit and proper person, they must immediately notify the GM Human Resources who will arrange for a new fit and proper assessment to be carried out.

If any person within the Group becomes aware of any information which may be relevant to the continuing assessment of a responsible person as fit and proper, they must advise the GM Human Resources who will arrange for a new fit and proper assessment to be carried out.

7.3 Reporting to APRA when a responsible person is not fit and proper

The Board must cause a report to be made to APRA of any assessment that a responsible person is not fit and proper within 10 business days of that assessment.

If the person remains in the Responsible Person Position, the notification to APRA must state the reason for this and the action that is being taken.

7.4 APRA exercising powers on fit and proper matters

The process in this paragraph 7 does not apply in circumstances where APRA exercises its powers under the Banking Act, Life Act, Insurance Act or Corporations Act to:

- a. disqualify a person; or
- b. direct the removal of a person,

from a Responsible Person Position, in which case the Regulated Group Member may act immediately to remove the person from that position.

8. BOQ Whistleblower Policy

The Board has adopted a Group policy on disclosure of matters of concern called BOQ Whistleblower, which is clearly communicated to directors and employees of the Group who are likely to have information relevant to fit and proper assessments.

That policy allows and encourages any Director, officer, employee or contractor, including Owner Managers and their employees and contractors, to confidentially provide information to designated persons in the Group in relation to matters of concern, which includes reporting conduct that may be relevant to fitness or propriety of a person who holds a Responsible Person Position.

BOQ Whistleblower procedures may be used to report matters which a reporting person reasonably believes affect the fitness or propriety of a responsible person. The Group must investigate any information reported in accordance with BOQ Whistleblower and ensure that all of the protections and immunities for reporting persons set out in BOQ Whistleblower are applied, including taking all responsible steps to ensure that no reporting person is subject to, or threatened with, a detriment because of any such reporting.

Each Regulated Group Member and its subsidiaries consents to any person notifying and providing information to either:

- a. the designated persons in the Group (including the GM Human Resources); or
- b. APRA,

if that person believes that a responsible person does not meet the fit and proper assessment criteria set out in this Policy, or if they believe that a Regulated Group Member is not complying with its obligations under the APRA Prudential Standards.

Each Regulated Group Member and its subsidiaries also consents to any person who held a Responsible Person Position disclosing information or providing documents to APRA relating to their reasons for resignation, retirement or removal.

9. Reporting requirements

The Board must ensure that, in consultation with the Company Secretary, the Group complies with all reporting requirements under APS 520, GPS 520 and LPS 520. This responsibility is delegated to the Chief Risk Officer.

The following information must be reported to APRA for each responsible person:

- a. the person's full name;
- b. the person's date of birth;
- c. the person's position and main responsibilities; and
- d. a statement of whether the person has been assessed under the Fit and Proper Policy.

It is the responsibility of the Group to ensure that the information required above remains correct for all of its responsible persons. Notification must be made to APRA within 28 days of any change in the above information as it pertains to a responsible person, or for any new appointment.

10. Monitoring and review

This policy will be monitored as to its application principally by the Head of People Services and the Company Secretary of the relevant Regulated Group Member. The policy will be reviewed by the Risk Committee at least annually with any modifications to be referred with recommendations to the Board.

11. Privacy

11.1 Collecting personal Information

In carrying out a fit and proper assessment, personal information (including sensitive information) about an applicant or employee may be collected.

The person to whom the information applies may in accordance with the *Privacy Act 1988 (Cth)* gain access to the information by contacting Human Resources.

If personal information (including sensitive information) is collected it will be used to:

- a. assess a person's fitness and propriety;
- b. comply with legislative and regulatory requirements;
- c. perform administrative functions including risk management, record keeping, archiving, staff training; and
- d. manage the Regulated Group Member's rights and obligations under its licences.

11.2 To whom will the Information be provided

Any personal information collected (including sensitive information) for the purposes of conducting a fit and proper assessment will be disclosed as required under this Fit and Proper Policy and APRA prudential standards, and legislative and regulatory requirements.

12. Document Retention

The Group must:

- a. document all information considered in assessing the fitness and propriety of a person for a particular role;
- b. immediately destroy documentation gathered for an unsuccessful applicant relating to assessment conducted as a component of the recruitment process;
- c. retain documentation relating to the assessment of a person for a role for a period of 7 years following the person ceasing to hold any role.

The GM Human Resources must ensure that full documentation of all assessments carried out under this policy are maintained and are available for inspection by the Board at any time.

13. Provision of Information

13.1 Applicants and Employees

Each person must provide a Regulated Group Member with all information and documentation that the Regulated Group Member reasonably requests, and any other information that may be relevant for the purposes of completing a fit and proper assessment for Responsible Person Positions.

Appendix One – Definitions

ADI means an authorised deposit taking institution required to be licensed under the Banking Act.

APG, GPG or LPG means the Prudential Practice Guides released by APRA which aim to assist regulated institutions in complying with requirements set out in released APS, GPS and LPS documents, and more generally, to outline prudent practices in relation to those standards.

APRA means the Australian Prudential Regulation Authority. APRA is the prudential regulator of the Australian financial services industry.

APRA Prudential Standards means APRA's Prudential Standards on Fit and Proper: APS 520, GPS 520 and LPS 520, made under section 11AF of the Banking Act, section 32 of the Insurance Act and section 230A of the Life Act respectively and includes the corresponding Prudential Practice Guides.

Appointed Actuary in relation to a Life Insurance Company means the Appointed Actuary referred to in paragraph 8(d) of APRA Prudential Standard LPS 520.

Appointed Actuary in relation to a General Insurance Company means the Appointed Actuary referred to in paragraph 10(d) of APRA Prudential Standard GPS 520.

Auditor means:

- a. the responsible auditor in respect of ADIs (referred to in paragraph 8(c) of APRA Prudential Standard APS 520);
- b. the appointed auditor in respect of General Insurance Companies (referred to in paragraph 10(c) of APRA Prudential Standard GPS 520); and
- c. the auditor in respect of Life Insurance Companies (referred to in paragraph 8(c) of APRA Prudential Standard LPS 520).

Bank means Bank of Queensland Limited ABN 32 009 656 740.

Banking Act means the Banking Act 1959 (Cth).

Board means the board of directors of the Bank or of another Regulated Group Member, as applicable.

Compliance means that part of the Group that has been established to monitor and maintain compliance measures to ensure that the Group complies with all the law and regulations that may apply to it from time to time.

Constitution means the constitution of the Bank or of another Regulated Group Member, as applicable.

Corporations Act means the Corporations Act 2001 (Cth).

Directors means a director of each Regulated Group Member.

General Insurance Company means each general insurance company in the Group which is required to be licenced under the Insurance Act.

Group means the Bank and all of its subsidiaries.

Insurance Act means the Insurance Act 1973 (Cth).

Insurance Companies means the Life Insurance Companies and the General Insurance Companies.

Life Act means the Life Insurance Act 1995 (Cth).

Life Insurance Company means each life insurance company in the Group which is required to be licenced by the Life Act.

Nomination Committee means the committee established by the Board to assess existing directors or candidates for nomination or appointment as a director, and making recommendations to the Board on

these matters.

Owner Manager means the franchisee of a franchised branch of the Bank.

Privacy Act means the Privacy Act 1988 (Cth).

Regulated Group Member means an ADI, Life Insurance Company or General Insurance Company in the Group to which the Prudential Standards apply.

Reviewing Actuary means the Reviewing Actuary of a General Insurance Company referred to in paragraph 10(d) of APRA Prudential Standard GPS 520.

Responsible Person Position means a position held where the responsibilities or activities of a person would lead to the person being a responsible person as defined in paragraph 3.1.

Risk Committee means the committee established by the relevant Board to generally review the effectiveness of the entity's risk management framework.

Senior Manager has the same meaning given to that term in paragraph 3.2 of this Policy. It is specifically noted that a senior manager does not need to be a permanent employee of the Group and that they may be a contractor or a consultant.

Senior Management means the Senior Managers who are collectively responsible for the day to day management of a Regulated Group Member and have involvement on the following relevant activities:

- Participation in decision-making
- Implementing strategies and policies approved by the Board
- Developing and implementing processes or systems that identify, assess, manage or monitor risks in relation to business activities and operations
- Monitoring the appropriateness, adequacy or effectiveness of risk management systems.

Related Documents

This Fit and Proper Policy should be read in conjunction with the following:

- Recruitment and Selection Policy
- Compliance Program
- Compliance Breaches and Disciplinary Action Policy
- Financial Services Reform Policy
- Employee Due Diligence Policy
- BOQ Whistleblower Policy

Annexures

Annexure A: Declaration - Fit and Proper Responsible Person (General use form)

Annexure B: Declaration - Fit and Proper Responsible Person (Auditors)

Annexure C: Declaration - Fit and Proper Responsible Person (Appointed Actuary)

Annexure D: Declaration - Fit and Proper Responsible Person (Reviewing Actuary)

ANNEXURE A

DECLARATION:

FIT AND PROPER RESPONSIBLE PERSON



To be completed by all Responsible Persons except Auditors and Appointed and Reviewing Actuaries who are required to complete the Declaration relevant for their position.

I (*insert name*), (*insert position*) (*insert company*) ("the Company") declare that:

1. I possess the necessary skills, knowledge, expertise, diligence and soundness of judgement to undertake and fulfil the particular duties and responsibilities of my position.
2. I have demonstrated the appropriate competence and integrity in fulfilling occupational, managerial or professional responsibilities previously and in the conduct of my current duties.
3. I have not demonstrated a lack of willingness to comply with legal obligations, regulatory requirements or professional standards, or been obstructive, misleading or untruthful in dealing with regulatory bodies or a court.
4. I have not been convicted of an offence against any of the following:
 - *Banking Act 1959*
 - *Corporations Act 2001*
 - *Financial Sector (Collection of Data) Act 2001*
 - *Financial Sector (Shareholdings) Act 1998*
 - *Financial Sector (Transfer of Business) Act 1999*
 - *Insurance Acquisitions and Takeovers Act 1991*
 - *Insurance Act 1973*
 - *Insurance Contracts Act 1984*
 - *Life Insurance Act 1995*
 - *Retirement Savings Accounts Act 1997*
 - *Superannuation Industry (Supervision) Act 1993*
 - *Superannuation (Resolution of Complaints) Act 1993*
 - or of any offence against or arising out of a law in force in Australia, including the law of a foreign country, being an offence which concerns fraud, misrepresentation or dishonesty.
5. I have not breached a fiduciary obligation.
6. I have not perpetrated or participated in negligent, deceitful, or otherwise discreditable business or professional practices.
7. I have not been reprimanded, or disqualified, or removed, by a professional or regulatory body in relation to matters relating to my honesty, integrity or business conduct.
8. I have not seriously or persistently failed to manage personal debts or financial affairs satisfactorily in circumstances where such failure caused loss to others.
9. I have never been bankrupt, have not applied to take the benefit of a law for the relief of a bankrupt or insolvent debtors or compounded with my creditors.

10. I have not been substantially involved in the management of a business or company which has failed, where that failure has been occasioned in part by deficiencies in that management.
11. To the best of my knowledge I am not of bad repute in any business or financial community or any market.
12. I am not and have not been the subject of civil or criminal proceedings or enforcement action, in relation to the management of an entity, or commercial or professional activities, which were determined adversely to me (including by consenting to an order or direction, or giving an undertaking, not to engage in unlawful or improper conduct) and which reflected adversely on my competence, diligence, judgement, honesty or integrity.
13. There are no legal actions current or pending against me; none of my personal and business tax returns are overdue; and there are no current or pending ATO actions against me or liabilities that are unlikely to be satisfactorily resolved.
14. I agree to undertake the training reasonably required by the Board of the Company so as to meet or to continue to meet the Fitness and Propriety requirements.
15. I will notify the Board of the Company immediately should any of the above change while I am a Responsible Person of the Company.
16. There are no other events or matters which affect my status as a fit and proper person.
17. I understand that I may access my personal information and contact the BOQ Group by contacting the Company Secretary.
18. I understand that if I provide the BOQ Group with incomplete or inaccurate information, the BOQ Group may not be able to carry out my initial and/or annual Fit and Proper Assessment for the purposes of complying with the Policy and the Prudential Standards.
19. I have been provided with a copy of the Policy and I have read and understood the Policy and agree to comply with the requirements of the Policy.
20. I agree to return a completed Fit and Proper Declaration to Human Resources and to provide the BOQ Group or APRA with any information required for the purposes of compliance with the Prudential Standards and this Policy, prior to my appointment as a Responsible Person and on an annual basis.

**** Where you are unable to make a declaration in relation to a specific matter, please strike a line through the matter and provide details in the space provided at the end of this declaration.***

I give consent to:

- (a) the BOQ Group, to collect and use any information (including my personal information or sensitive information) by the Group to comply with the Policy or the Prudential Standards; and
- (b) APRA to collect or use any information (including personal or sensitive information) for its powers and functions under the *Banking Act 1959* (Cth), *Life Insurance Act 1995* (Cth) and *Insurance Act 1973* (Cth).

Declaration in relation to a specific matter (please include annexure if insufficient space).

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Sign:
Print:
Date:

ANNEXURE B

DECLARATION:



FIT AND PROPER RESPONSIBLE PERSON (RESPONSIBLE AUDITORS & APPOINTED AUDITORS)

I (*insert name*), (*insert position*) (*insert company*) (“the Company”) declare that:

1. I possess the necessary skills, knowledge, expertise, diligence and soundness of judgement to undertake and fulfil the particular duties and responsibilities of my position.
2. I have demonstrated the appropriate competence and integrity in fulfilling occupational, managerial or professional responsibilities previously and in the conduct of my current duties.
3. I have not demonstrated a lack of willingness to comply with legal obligations, regulatory requirements or professional standards, or been obstructive, misleading or untruthful in dealing with regulatory bodies or a court.
4. I have not been convicted of an offence against any of the following:
 - *Banking Act 1959*
 - *Corporations Act 2001*
 - *Financial Sector (Collection of Data) Act 2001*
 - *Financial Sector (Shareholdings) Act 1998*
 - *Financial Sector (Transfer of Business) Act 1999*
 - *Insurance Acquisitions and Takeovers Act 1991*
 - *Insurance Act 1973*
 - *Insurance Contracts Act 1984*
 - *Life Insurance Act 1995*
 - *Retirement Savings Accounts Act 1997*
 - *Superannuation Industry (Supervision) Act 1993*
 - *Superannuation (Resolution of Complaints) Act 1993*
 - or of any offence against or arising out of a law in force in Australia, including the law of a foreign country, being an offence which concerns fraud, misrepresentation or dishonesty.
5. I have not breached a fiduciary obligation.
6. I have not perpetrated or participated in negligent, deceitful, or otherwise discreditable business or professional practices.
7. I have not been reprimanded, or disqualified, or removed, by a professional or regulatory body in relation to matters relating to my honesty, integrity or business conduct.
8. I have not seriously or persistently failed to manage personal debts or financial affairs satisfactorily in circumstances where such failure caused loss to others.
9. I have never been bankrupt, have not applied to take the benefit of a law for the relief of a bankrupt or insolvent debtors or compounded with my creditors.
10. I have not been substantially involved in the management of a business or company which has failed, where that failure has been occasioned in part by deficiencies in that management.

11. To the best of my knowledge I am not of bad repute in any business or financial community or any market.
12. I am not and have not been the subject of civil or criminal proceedings or enforcement action, in relation to the management of an entity, or commercial or professional activities, which were determined adversely to me (including by consenting to an order or direction, or giving an undertaking, not to engage in unlawful or improper conduct) and which reflected adversely on my competence, diligence, judgement, honesty or integrity.
13. There are no legal actions current or pending against me; none of my personal and business tax returns are overdue; and there are no current or pending ATO actions against me or liabilities that are unlikely to be satisfactorily resolved.
14. I am a registered company auditor under the *Corporations Act 2001*.
15. I am not:
 - (i) the Appointed Actuary of the life company or insurer; or
 - (ii) an employee or director of an entity of which the Appointed Actuary is an employee or director; or
 - (iii) a partner of the Appointed Actuary.
16. I have a minimum of 5 years relevant experience in the audit of life companies and / or insurers and experience relating to life companies and / or insurers that has been sufficiently relevant and recent to provide reasonable assurance that I am familiar with current issues in the audit of life companies and / or insurers.
17. I am a member of a recognised professional body; and ordinarily resident in Australia.
18. I agree to undertake the training reasonably required by the Board of the Company so as to meet or to continue to meet the Fitness and Propriety requirements.
19. I will notify the Board of the Company immediately should any of the above change while I am a Responsible Person of the Company.
20. There are no other events or matters which affect my status as a fit and proper person.
21. I understand that I may access my personal information and contact the BOQ Group by contacting the Company Secretary.
22. I understand that if I provide the BOQ Group with incomplete or inaccurate information, the BOQ Group may not be able to carry out my initial and/or annual Fit and Proper Assessment for the purposes of complying with the Policy and the Prudential Standards.
23. I have been provided with a copy of the Policy and I have read and understood the Policy and agree to comply with the requirements of the Policy.
24. I agree to return a completed Fit and Proper Declaration to Human Resources and to provide the BOQ Group or APRA with any information required for the purposes of compliance with the Prudential Standards and this Policy, prior to my appointment as a Responsible Person and on an annual basis.

*** Where you are unable to make a declaration in relation to a specific matter, please strike a line through the matter and provide details in the space provided at the end of this declaration.**

I give consent to:

- (a) the BOQ Group, to collect and use any information (including my personal information or sensitive information) by the Group to comply with the Policy or the Prudential Standards; and
- (b) APRA to collect or use any information (including personal or sensitive information) for its powers and functions under the *Banking Act 1959* (Cth), *Life Insurance Act 1995* (Cth) and *Insurance Act 1973* (Cth).

Declaration in relation to a specific matter (please include annexure if insufficient space).

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Sign:

Print:

Date:



ANNEXURE C

DECLARATION:

FIT AND PROPER RESPONSIBLE PERSON (APPOINTED ACTUARY)

I (*insert name*), (*insert position*) (*insert company*) (“the Company”) declare that:

1. I possess the necessary skills, knowledge, expertise, diligence and soundness of judgement to undertake and fulfil the particular duties and responsibilities of my position.
2. I have demonstrated the appropriate competence and integrity in fulfilling occupational, managerial or professional responsibilities previously and in the conduct of my current duties.
3. I have not demonstrated a lack of willingness to comply with legal obligations, regulatory requirements or professional standards, or been obstructive, misleading or untruthful in dealing with regulatory bodies or a court.
4. I have not been convicted of an offence against any of the following:
 - *Banking Act 1959*
 - *Corporations Act 2001*
 - *Financial Sector (Collection of Data) Act 2001*
 - *Financial Sector (Shareholdings) Act 1998*
 - *Financial Sector (Transfer of Business) Act 1999*
 - *Insurance Acquisitions and Takeovers Act 1991*
 - *Insurance Act 1973*
 - *Insurance Contracts Act 1984*
 - *Life Insurance Act 1995*
 - *Retirement Savings Accounts Act 1997*
 - *Superannuation Industry (Supervision) Act 1993*
 - *Superannuation (Resolution of Complaints) Act 1993*
 - or of any offence against or arising out of a law in force in Australia, including the law of a foreign country, being an offence which concerns fraud, misrepresentation or dishonesty.
5. I have not breached a fiduciary obligation.
6. I have not perpetrated or participated in negligent, deceitful, or otherwise discreditable business or professional practices.
7. I have not been reprimanded, or disqualified, or removed, by a professional or regulatory body in relation to matters relating to my honesty, integrity or business conduct.
8. I have not seriously or persistently failed to manage personal debts or financial affairs satisfactorily in circumstances where such failure caused loss to others.
9. I have never been bankrupt, have not applied to take the benefit of a law for the relief of a bankrupt or insolvent debtors or compounded with my creditors.

10. I have not been substantially involved in the management of a business or company which has failed, where that failure has been occasioned in part by deficiencies in that management.
11. To the best of my knowledge I am not of bad repute in any business or financial community or any market.
12. I am not and have not been the subject of civil or criminal proceedings or enforcement action, in relation to the management of an entity, or commercial or professional activities, which were determined adversely to me (including by consenting to an order or direction, or giving an undertaking, not to engage in unlawful or improper conduct) and which reflected adversely on my competence, diligence, judgement, honesty or integrity.
13. There are no legal actions current or pending against me; none of my personal and business tax returns are overdue; and there are no current or pending ATO actions against me or liabilities that are unlikely to be satisfactorily resolved.
14. I hold the appropriate formal qualifications.
15. I am not:
 - (i) the Chief Executive nor a Director of the life company or insurer, or of a related body corporate; or
 - (ii) the Appointed Auditor; or
 - (iii) an employee or director of an entity of which the Appointed Auditor is an employee or director; or
 - (iii) a partner of the Appointed Auditor.
16. I have a minimum of 5 years relevant experience in the provision of actuarial services to entities carrying on life and / or general insurance business.
17. I am familiar with current issues in the provision of actuarial services to such entities.
18. I am a Fellow or Accredited Member of the Institute of Actuaries of Australia; and ordinarily resident in Australia.
19. I agree to undertake the training reasonably required by the Board of the Company so as to meet or to continue to meet the Fitness and Propriety requirements.
20. I will notify the Board of the Company immediately should any of the above change while I am a Responsible Person of the Company.
21. There are no other events or matters which affect my status as a fit and proper person.
22. I understand that I may access my personal information and contact the BOQ Group or the Company by contacting the Company Secretary.
23. I understand that if I provide the BOQ Group with incomplete or inaccurate information, the BOQ Group may not be able to carry out my initial and/or annual Fit and Proper Assessment for the purposes of complying with the Policy and the Prudential Standards.
24. I have been provided with a copy of the Policy and I have read and understood the Policy and agree to comply with the requirements of the Policy.
25. I agree to return a completed Fit and Proper Declaration to Human Resources and to provide the BOQ Group or APRA with any information required for the purposes of compliance with the Prudential Standards and this Policy, prior to my appointment as a Responsible Person and on an annual basis.

**** Where you are unable to make a declaration in relation to a specific matter, please strike a line through the matter and provide details in the space provided at the end of this declaration.***

I give consent to:

- (a) the BOQ Group, to collect and use any information (including my personal information or sensitive information) by the Group to comply with the Policy or the Prudential Standards; and

- (b) APRA to collect or use any information (including personal or sensitive information) for its powers and functions under the *Banking Act 1959* (Cth), *Life Insurance Act 1995* (Cth) and *Insurance Act 1973* (Cth).

Declaration in relation to a specific matter (please include annexure if insufficient space).

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Sign:
Print:
Date:



ANNEXURE D

DECLARATION:

FIT AND PROPER RESPONSIBLE PERSON (REVIEWING ACTUARY)

I (*insert name*), (*insert position*) (*insert company*) ("the Company") declare that:

1. I possess the necessary skills, knowledge, expertise, diligence and soundness of judgement to undertake and fulfil the particular duties and responsibilities of my position.
2. I have demonstrated the appropriate competence and integrity in fulfilling occupational, managerial or professional responsibilities previously and in the conduct of my current duties.
3. I have not demonstrated a lack of willingness to comply with legal obligations, regulatory requirements or professional standards, or been obstructive, misleading or untruthful in dealing with regulatory bodies or a court.
4. I have not been convicted of an offence against any of the following:
 - *Banking Act 1959*
 - *Corporations Act 2001*
 - *Financial Sector (Collection of Data) Act 2001*
 - *Financial Sector (Shareholdings) Act 1998*
 - *Financial Sector (Transfer of Business) Act 1999*
 - *Insurance Acquisitions and Takeovers Act 1991*
 - *Insurance Act 1973*
 - *Insurance Contracts Act 1984*
 - *Life Insurance Act 1995*
 - *Retirement Savings Accounts Act 1997*
 - *Superannuation Industry (Supervision) Act 1993*
 - *Superannuation (Resolution of Complaints) Act 1993*
 - or of any offence against or arising out of a law in force in Australia, including the law of a foreign country, being an offence which concerns fraud, misrepresentation or dishonesty.
5. I have not breached a fiduciary obligation.
6. I have not perpetrated or participated in negligent, deceitful, or otherwise discreditable business or professional practices.
7. I have not been reprimanded, or disqualified, or removed, by a professional or regulatory body in relation to matters relating to my honesty, integrity or business conduct.
8. I have not seriously or persistently failed to manage personal debts or financial affairs satisfactorily in circumstances where such failure caused loss to others.
9. I have never been bankrupt, have not applied to take the benefit of a law for the relief of a bankrupt or insolvent debtors or compounded with my creditors.
10. I have not been substantially involved in the management of a business or company which has failed, where that failure has been occasioned in part by deficiencies in that management.

11. To the best of my knowledge I am not of bad repute in any business or financial community or any market.
12. I am not and have not been the subject of civil or criminal proceedings or enforcement action, in relation to the management of an entity, or commercial or professional activities, which were determined adversely to me (including by consenting to an order or direction, or giving an undertaking, not to engage in unlawful or improper conduct) and which reflected adversely on my competence, diligence, judgement, honesty or integrity.
13. There are no legal actions current or pending against me; none of my personal and business tax returns are overdue; and there are no current or pending ATO actions against me or liabilities that are unlikely to be satisfactorily resolved.
14. I hold the appropriate formal qualifications.
15. I am not:
 - (i) the Chief Executive nor a Director of the life company or insurer, or of a related body corporate; or
 - (ii) an employee of the insurer; or
 - (ii) the Appointed Auditor; or
 - (iii) an employee or director of an entity of which the Appointed Actuary is an employee or director; or from a related firm or company; or
 - (iii) a partner of the same firm or related firm as the Appointed Actuary.
16. I have a minimum of 5 years relevant experience in the provision of actuarial services to entities carrying on life and/ or general insurance business.
17. I am familiar with current issues in the provision of actuarial services to such entities.
18. I am a Fellow or Accredited Member of the Institute of Actuaries of Australia; and ordinarily resident in Australia.
19. I agree to undertake the training reasonably required by the Board of the Company so as to meet or to continue to meet the Fitness and Propriety requirements.
20. I will notify the Board of the Company immediately should any of the above change while I am a Responsible Person of the Company.
21. There are no other events or matters which affect my status as a fit and proper person.
22. I understand that I may access my personal information and contact the BOQ Group by contacting the Company Secretary.
23. I understand that if I provide the BOQ Group with incomplete or inaccurate information, the BOQ Group may not be able to carry out my initial and/or annual Fit and Proper Assessment for the purposes of complying with the Policy and the Prudential Standards.
24. I have been provided with a copy of the Policy and I have read and understood the Policy and agree to comply with the requirements of the Policy.
25. I agree to return a completed Fit and Proper Declaration to Human Resources and to provide the BOQ Group or APRA with any information required for the purposes of compliance with the Prudential Standards and this Policy, prior to my appointment as a Responsible Person and on an annual basis.

**** Where you are unable to make a declaration in relation to a specific matter, please strike a line through the matter and provide details in the space provided at the end of this declaration.***

I give consent to:

- (a) the BOQ Group, to collect and use any information (including my personal information or sensitive information) by the Group to comply with the Policy or the Prudential Standards; and
- (b) APRA to collect or use any information (including personal or sensitive information) for its

powers and functions under the *Banking Act 1959* (Cth), *Life Insurance Act 1995* (Cth) and *Insurance Act 1973* (Cth).

Declaration in relation to a specific matter (please include annexure if insufficient space).

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Sign:
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