

Financial Accountability Regime Policy

(Approved by the Board 25 March 2025)

1. Purpose

This Policy establishes RBHS's framework to comply with the *Financial Accountability Regime Act 2023* (FAR).

FAR applies to all private health insurers and is intended to provide clear and strengthened expectations around accountability for directors and senior executives (accountable persons of accountable entities) and improve the operating culture in relation to both prudential and conduct related matters. Clear accountability helps to protect the interests of our members through strong governance and compliance with regulatory standards.

FAR imposes accountability obligations on RBHS and Accountable Persons. Obligations are imposed on all accountable entities regarding how they appoint and remunerate Accountable Persons, how they demonstrate reasonable steps and what circumstances require notifications to be made to APRA and ASIC.

2. Scope

This policy applies to all Accountable Persons as defined in this Policy. It includes the RBHS Board of Directors, Key Personnel appointed by RBHS to act as Accountable Persons and any other individuals holding key roles as defined under the Financial Accountability Regime. This policy also applies to other employees to the extent that they have a role in supporting the administration of the policy requirements.

RBHS has an Agreement in place with Peoplecare Health Limited for the provision of administration services to the Fund. This agreement includes a requirement for Peoplecare to provide the services of Chief Executive Officer, Chief Financial Officer and Chief Risk Officer to RBHS. Each of these roles are considered Accountable Persons of RBHS under the Financial Accountability Regime.

3. Roles and Responsibilities

Role	Responsibility
Board of Directors	<ul style="list-style-type: none">• Ensure overall compliance with the Financial Accountability Regime.• Set the tone for accountability, culture and ethical conduct.• Approve the Financial Accountability Regime Policy.• Approve the Remuneration Policy.• Oversee input into performance and remuneration outcomes for Accountable Persons.• Ensure that only suitable individuals are registered as Accountable Persons.

Nomination and Remuneration Committee (NRC)	<ul style="list-style-type: none"> • Review and recommend approval of the Financial Accountability Regime Policy. • Review and recommend approval of the Remuneration Policy. • Review and assess the suitability of individuals to be registered as Accountable Persons. • Assess performance and conduct of the CEO to ensure they have taken Reasonable Steps to manage their accountabilities. • Assess the conduct of Accountable Persons ensuring they have taken Reasonable Steps to manage their accountabilities. • Consider the CEO's assessment of Accountable Persons meeting their FAR obligations. • Provide input to Peoplecare's People and Culture Committee regarding the performance of RBHS Accountable Persons, to help inform performance, remuneration and consequence outcomes of those individuals.
Chair, Nomination and Remuneration Committee	<ul style="list-style-type: none"> • Engage with the chair of Peoplecare's People & Culture Committee at least annually to gain assurances and be satisfied that performance management and remuneration practices for people acting as Accountable Persons for RBHS meet the requirements of this Policy.
Risk Committee	<ul style="list-style-type: none"> • Oversee that Accountable Persons comply with risks and obligations they are responsible for managing. • Provide the Peoplecare People & Culture Committee with information, if requested, to support with the performance assessment of Accountable Persons. • Monitor remediation of FAR breaches. • Oversee the appropriateness and effectiveness of Risk Management Strategy to support FAR compliance.
Audit Committee	<ul style="list-style-type: none"> • Oversee audits of the Financial Accountability Regime and remediation of any audit findings. • Provide the Nomination and Remuneration Committee with requested information to support with the performance assessment of Accountable Persons. • Monitor remediation of audit findings. • Oversee the appropriateness and effectiveness of Risk Management Strategy through periodic audits to support FAR compliance.

Accountable Persons	<ul style="list-style-type: none"> • Meet their obligations to manage and control RBHS. • Understand their Accountability Obligations and ensure their Accountability Statement accurately reflects their obligations. • Take reasonable steps to demonstrate compliance with Accountability Obligations outlined in their Accountability Statement. • Ensure they understand their Accountability Obligations and keep their knowledge of these obligations relevant. • Address accountability gaps and breaches in a timely manner. Notify the Chief Executive Officer, Chief Risk Officer and Peoplecare Chief People & Culture Officer, immediately of any suspected or confirmed breaches of Accountability Obligations. • Notify the Peoplecare Chief People & Culture Officer of any changes in accountabilities or prescribed responsibilities allocated to the Accountable Person. • Complete an annual Declaration of their Accountabilities and Reasonable Steps for submission to the CEO.
Chief Executive Officer (CEO)	<ul style="list-style-type: none"> • Recommend the appointment of Accountable People to the Nomination and Remuneration Committee. • Recommend the allocation of accountabilities across the appointed Accountable People to the Nomination and Remuneration Committee. • Assess the conduct and performance of Accountable Persons (excluding Directors) in meeting their Accountability obligations. • Provide performance evaluations to the NRC for review. • Follow the consequent management process outlined in this Policy and recommend corrective actions, including remedial action or escalation to the Nominations & Remuneration and Risk Committees as required by policy.
Peoplecare Chief People and Culture Officer (CPCO)	<ul style="list-style-type: none"> • Develop, implement and monitor the Financial Accountability Regime Policy. • Maintain the Remuneration Policy. • Establish and maintain an Accountability Map and Accountability Statement for all Accountable Persons. • Ensure the Accountability Map and Accountability Statements include all Prescribed Responsibilities, Key Functions and Operations as defined under the FAR Act. • Ensure Induction Training and Handover is provided to all Accountable Persons (including those appointed temporarily). • Follow the consequence management procedures including notification to the CEO and RBHS Board. • Support the CEO in preparing performance assessments of Accountable Persons to Peoplecare's People and Culture Committee (via the Nominations & Remuneration Committee). • Ensure all notification obligations under FAR are met.

Chief Risk Officer (CRO)	<ul style="list-style-type: none"> • Implement and maintain and the Risk Management Strategy to support RBHS and Accountable Persons in managing their material risks and compliance obligations. • Validate the recommendation to appoint Accountable People and the allocation of accountabilities between each Accountable Person ensuring RBHS meets FAR obligations. • Review, assess and report FAR breaches in accordance with RBHS/Peoplecare Incident Management Policy. • Maintain the APRA register of Accountable Persons and their allocated accountabilities. • Manage all FAR regulatory notification obligations as defined in this policy.
--------------------------	--

4. Risk Covered by the Policy

This policy addresses the following key risks:

- **Accountability Gaps** - Ensures clear allocation of accountability and key decision-making processes.
- **Non-Compliance with FAR Requirements** - Mitigates the risk of non-compliance with APRA's Financial Accountability Regime (FAR) obligations.
- **Role Clarity Issues** - Reduces ambiguity regarding the roles and responsibilities of accountable persons.
- **Inadequate Governance** - Strengthens governance by ensuring Accountable Persons are accountable for outcomes.
- **Culture of Accountability** - Fosters a culture of accountability, reducing risks from poor decision-making or lack of ownership.

5. Accountable Entity and Accountable Persons

The FAR defines both Accountable Entities and Accountable Persons, detailing the obligations that RBHS must adhere to as an entity, as well as the individual obligations of accountable persons.

Accountable Entity

RBHS is an accountable entity and must take reasonable steps to:

- Conduct its business with honesty, integrity, and due skill, care, and diligence.
- Deal with APRA and ASIC in an open, constructive, and cooperative manner.
- Prevent matters from arising that would adversely affect RBHS' prudential standing or reputation.
- Ensure that each accountable person meets their accountability obligations.

Accountable Person

An accountable person is an individual within RBHS who holds a position with actual or effective senior executive responsibility for:

- Management or control of the accountable entity.
- Management or control of a significant or substantial part or aspect of the operations.

Accountable persons must:

- Act with honesty and integrity, and with due skill, care and diligence
- Deal with the Regulators in an open, constructive and cooperative way
- Take reasonable steps in conducting the responsibilities of their position to prevent matters from arising that would (or would be likely to) adversely affect the prudential standing or reputation of the accountable entity; and
- Take reasonable steps in conducting the responsibilities of the AP's position to prevent matters from arising that would (or would likely to) result in a material contravention by the accountable entity of applicable legislative provisions.

Temporary Accountability

An individual may temporarily fill the position of an accountable person for up to 90 days without being registered with APRA. During this period, the individual is considered the Accountable Person. All temporary accountable persons will be inducted by the primary accountable person, Peoplecare CPCO and CRO. The primary accountable person will also receive a formal handover after their return from temporary absence.

For any temporary appointment beyond 90 days the individual must be formally appointed and inducted as per this policy and the Fit and Proper Policy

All temporary appointments of Accountable Persons must be approved by the RBHS Board, or an authorised delegate of the Board.

Obligations Regarding Accountable Persons

RBHS, as an accountable entity, is required to adhere to Key Personnel Obligations under FAR to support the selection and registration of appropriate accountable persons. Per section 23(1) of the Act, RBHS must ensure:

- the responsibilities of accountable persons cover all aspects of the entity, and all prescribed responsibilities;
- no accountable persons are prohibited (unregistered as an accountable person of Peoplecare or disqualified by the Regulator from acting as an accountable person); and
- RBHS complies with each direction given by the Regulator.

These obligations require RBHS to ensure all prescribed responsibilities are allocated to an Accountable Person and that all Accountable Persons are registered with the Regulators in accordance with this policy.

6. Appointment of Accountable Persons

An individual who is proposed to be appointed as an Accountable Person, must meet the Accountable Persons obligations set out in Section 5. RBHS must also assess that the individual is suitable to be an Accountable Person.

RBHS will follow the Fit & Proper policy to form a view on the suitability of the nominated individual to act in an Accountable Person role. This will include checking Regulator disqualification listings.

All proposed appointments of Accountable Persons will be presented to the Nomination and Remuneration Committee for approval by the Committee Chair. The Committee Chair will receive confirmation that the individual/s have met the Fit and Proper process requirements.

The Peoplecare CPCO must notify the Company Secretary and CRO of any changes to Accountable Persons to ensure timely reporting and compliance with APRA's notification requirements.

Accountable Persons are listed in **Appendix A**.

7. Registration and Deregistration of Accountable Persons

APRA Connect is used as the single portal for the FAR data collection, including registering Accountable Persons. To register an Accountable Person, RBHS must complete the 'Financial Accountability Regime - Register Accountable Person' form on APRA Connect as it applies to each accountable entity.

To register an Accountable Person, RBHS makes an application in APRA connect. The application must include:

- Personal identification details of the Accountable Person such as, their name, date of birth, phone number, email address, role start date, employer name and any previous disqualifications.
- Prescribed responsibilities and key functions allocated to the Accountable Person and any joint responsibilities.
- The position title the Accountable Person reports to and the start date of the reporting line.
- A signed declaration by the Chair of the NRC (or a director delegate) that the accountable entity is satisfied the person is suitable to be an Accountable Person; and
- The individual's accountability statement (only if enhanced notification obligations apply).

The Regulators have 21 days to request additional information from RBHS with respect to a registration. Should the Regulators not request additional information within this timeframe the Accountable Person is deemed registered.

When an Accountable Person ceases, they will be deregistered with the Regulator. Additionally, the Peoplecare CPCO will ensure the Accountable Person completes a handover to the new permanent or temporary Accountable Person as described in Section 11.

8. Handover between Accountable Persons

Handovers must be performed with all incoming Accountable Persons, or whenever accountability is reallocated between Accountable Persons.

The Peoplecare CPCO will schedule an initial training session with the incoming Accountable Person to inform them of their accountabilities and the outcomes of this conversation will be documented.

Where possible, the current Accountable Person will attend this handover meeting. The handover will provide the Accountable Persons with an initial understanding of:

- their accountability statement, and any changes or revisions made to this
- the scope, nature and extent of their accountabilities and prescribed responsibilities, inclusive of any limitations or joint accountabilities
- the material risks, risk appetite and risk profile relating to their function
- any recent or significant regulatory correspondence related to their function, including unresolved matters
- any recent or significant incidents related to their area, including unresolved matters
- any significant third-party relationships, including service providers or industry relationships
- any material control weaknesses, data deficiencies, known problems, or performance issues
- an understanding of the current delegations and direct reports in place; and
- an understanding of the governance structures, forums, and oversight committees to which the Accountable Persons must report.

Handover materials are to be kept by Peoplecare CPCO for record-keeping purposes.

Notification obligations regarding individuals who cease to be an Accountable Person are outlined in this policy.

9. Accountability Map and Accountability Statements

An Accountability Map and Accountability Statements are tools designed to document and allocate responsibilities within RBHS under the Financial Accountability Regime. The Accountability Map and Accountability Statements will include all Prescribed Responsibilities and Key Functions which are defined in the Minister Rules. They will also cover all aspects of RBHS's Operations.

RBHS is considered a Core Entity under the FAR Act and therefore these documents are not mandatory. However, RBHS has adopted these tools as part of its commitment to best practice and to ensure all accountabilities are clearly mapped, understood, and aligned across the organisation. These documents provide transparency, reduce ambiguity, and support compliance with FAR obligations.

For the Board of Directors, the Board Governance Policy and Committee Terms of Reference will align to the Board accountability statements. Where a Director is also a committee member their Accountability Statement will reflect their additional accountabilities as a member of that committee.

The Peoplecare CPCO is responsible for establishing and maintaining the Accountability Map and Statements. These documents are to be approved by the Board.

The Accountability Map and Accountability Statements will be updated and approved whenever there is a transfer of accountabilities between Accountable People.

10. Reasonable Steps to Demonstrate Compliance with FAR

RBHS (as an accountable entity) and Accountable Persons are required to take **reasonable steps**¹ on an ongoing and continuous basis to ensure they continue to meet their obligations in managing and controlling the business. The key elements of Reasonable Steps may include:

1. Appropriate Governance, Control, and Risk Management
2. Safeguards Against Inappropriate Delegation of Responsibility
3. Procedures for Identifying and Remediating Problems
4. Taking Appropriate Action to Ensure Compliance
5. Taking Appropriate Action in Response to Non-Compliance or Suspected Non-Compliance.

RBHS has effective governance, risk and compliance activities embedded to ensure it, and its Accountable People, can take reasonable steps to fulfil its obligations on an ongoing basis. The required reasonable steps and how this is achieved through these activities is set out below. A visual representation of the governance risk and compliance activities are outlined in **Appendix B**.

Reasonable steps	How this is achieved
Having appropriate governance, control, and risk management	<ul style="list-style-type: none"> Established governance structures (Risk Committee, Audit Committee, Nomination and Remuneration Committee, Board, strategy meetings) to oversee obligations Risk Management Strategy Risk Appetite Statement Compliance Obligations Framework Board policies in place to manage material risks and compliance obligations Internal Audit Plan External Audit Plan Annual Financial Conditions Report Actuarial Advice Framework Board and Committee minutes to evidence decisions Board and Committee Actions to track activities Risk management System (Protecht)
Having safeguards against inappropriate delegations of responsibility	<ul style="list-style-type: none"> Delegations Policy and Matrix Accountability Map and Accountability Statements Delegations aligned with internal policies and systems

Section 22 of the FAR act

Having appropriate procedures for identifying and remediating problems that arise or may arise	<ul style="list-style-type: none"> • Fit & Proper Policy • Incident Management Policy • Remuneration Policy • Whistleblower Policy
Taking appropriate action to ensure compliance	<ul style="list-style-type: none"> • Financial Accountability Regime Policy • Accountable Person Induction and Training • Accountability Statements • Performance Reviews of Accountable Persons
Taking appropriate action in response to non-compliance, or suspected non-compliance	<ul style="list-style-type: none"> • Financial Accountability Policy • Remuneration Policy • Incident Management Policy • Whistleblower Policy

Ongoing Monitoring Activities to Demonstrate Reasonable Steps

Accountable Persons must be able to continually demonstrate that they have taken Reasonable steps to prevent matters that could adversely affect the prudential standing or reputation of Peoplecare and to prevent material contraventions of any laws specified under s21(d) of the *Financial Accountability Regime (FAR) Act*.

To support RBHS and each Accountable Person in demonstrating reasonable steps, RBHS records, monitors and maintains Governance Risk and Compliance activities within its risk management system (Protecht). This provides structured governance and oversight to enable RBHS to monitor activities (such as resolution of audit findings, incidents, risk reviews etc) and ensure that both RBHS and each Accountable Person is taking reasonable steps to meet its obligations. Activities and outcomes are centralised in this system to enable efficient recording and monitoring of reasonable steps activities.

Reasonable Steps Assessment (excluding Directors)

To ensure ongoing compliance with FAR, Accountable Persons must complete Reasonable Steps Assessments. This assessment supports governance oversight and serves as input into the performance evaluation and remuneration outcomes of Accountable Persons.

The reasonable steps assessment process will occur on an annual basis as part of the annual performance cycle.

Accountable Person Reasonable Steps Assessment (excluding CEO & Directors):

The Accountable Person will, at a minimum:

1. Review their activities in the Risk Management System (Protecht), including risk reviews, audit findings, incidents, compliance attestations and any other assigned risk and compliance activities to support their reasonable steps assessment.

2. Collate any other relevant evidence they can provide to demonstrate reasonable steps.
3. Provide a summary assessment on their reasonable steps for CEO review confirming:
 - a. whether they have taken action to demonstrate compliance with their FAR obligations and record supporting evidence.
 - b. Report any failures to take Reasonable Steps with corrective actions documented.
4. Sign an annual declaration to acknowledge their allocation of accountabilities, that reasonable steps have been completed and other items as outlined in **Appendix C**.

The CEO will:

1. Seek input from the CRO and Peoplecare CPCO on the Accountable Person reasonable steps self-assessment.
2. Review the allocated accountabilities against the Accountable Person to ensure they are still appropriate.
3. Review the Reasonable Steps undertaken by the Accountable Person to ensure they are meeting their FAR obligations.
4. Consider compliance with FAR as part of broader performance and remuneration processes as per the RBHS Remuneration Policy.
5. Note: External advice may be sought by the CEO on the CRO reasonable steps self-assessment as required.

CEO Reasonable Steps Assessment:

1. Seek a report from the CRO on the reasonable steps undertaken by Accountable People in alignment with the Risk Management Strategy (excluding Directors and including the CEO).
2. Sign an annual declaration to acknowledge their allocation of accountabilities and other items as outlined in **Appendix C**.
3. Submit this report to the NRC committee and Chair of the Board.
4. The Board, through the NRC will review and approve the CEO's Reasonable Steps Assessment and Attestation.
5. Consider compliance with FAR as part of broader performance and remuneration processes as per the RBHS Remuneration Policy.
6. Note: External advice may be sought by the Board on the CEO reasonable steps self-assessment as required.

Board of Director Reasonable Steps Assessment

To support the Board in facilitating its reasonable steps assessment, the CRO will assess whether the following key activities have been met by the Board and Committees:

- Board Governance Policy and Terms of references are current and approved by the Board, ensuring all Accountabilities of the Board are adequately defined.
- Board agenda is established and aligned to the Board Governance Policy and terms of reference to ensure all accountabilities are tabled at each Board and Committee meeting to fulfil the Board's obligations.

- Reporting of key matters as defined in the Board Governance Policy and Terms of references have been presented at each meeting to support the Board in fulfilling their accountability obligations.
- All board and committee meetings have been minuted, capturing key items of discussion and key decisions made by the Board and Committees. Minutes have been reviewed and approved by the Board.
- Delegations Policy and Matrix is current, approved by the Board and implemented.
- An annual declaration to acknowledge their allocation of accountabilities and other items as outlined in **Appendix C**.

The outcomes of the assessment will be presented to the NRC annually and will be considered as part of broader Board performance and remuneration reviews and related processes (and as per the Remuneration Policy).

External advice may be sought by the Board on their reasonable steps self-assessment as required.

11. FAR Breaches and Consequence Management

A FAR breach occurs when an Accountable Person fails to comply with their obligations as an Accountable Person including if they fail to take reasonable steps to fulfill their prescribed responsibilities.

A FAR breach may be identified through any of the following mechanisms:

- Reasonable Steps activities
- Reasonable Steps assessment
- Internal or external audits
- Performance Reviews
- Whistleblowing
- Grievances

When a potential FAR breach is identified, the following will occur:

1. CRO and Peoplecare CPCO conducts an initial assessment to determine if it relates to an Accountable Person's obligations and whether they have failed to comply with this policy and the FAR legislation.
2. During this process the Accountable Person will have the opportunity to participate in this assessment and provide information to support with the assessment process.
3. The CRO and Peoplecare CPCO will provide to the CEO:
 1. The output of the breach assessment and evidence gathered during the assessment process.
 2. If the output of the assessment concludes that a breach has occurred the report will include the proposed materiality of the breach and regulator notification requirements.
4. The CEO will assess the breach and make a recommendation to the NRC on whether the breach did occur, the materiality of the breach, regulator notification requirements and consequent management recommendations.
5. The NRC will make a recommendation to the Board on notification requirements and consequent management activities.

If the CRO becomes aware of any suspected or actual breaches of FAR as it relates to themselves, they are to declare to the CEO. The CEO will then engage the NRC and will seek external advice to manage conflicts.

If the CEO becomes aware of any suspected or actual breaches of FAR as it relates to themselves, they are to declare to the Chair of the Board and the NRC directly. The Board will then seek external advice to manage conflicts as required.

Consequence Management

The Peoplecare CPCO will make a recommendation to the CEO on the appropriate consequence for confirmed FAR breaches that were the conduct of Accountable People (excluding Directors). The CEO will consult with the NRC to determine the appropriate consequences for the FAR breach in alignment with RBHS's Remuneration Policy and terms of the services agreement between Peoplecare and RBHS.

The NRC will make a recommendation to the Board on consequences applicable to Directors and the Chair of the Board will apply these consequences as per the Constitution, other relevant Board policies or required by legislation.

12. RBHS's Oversight, Assurance and Consequence Management for Accountable Persons Provided by Peoplecare

As RBHS does not directly employ its Accountable Persons, it is unable to apply direct remuneration consequences for non-performance or failure to meet their FAR obligations.

As such RBHS will maintain control, oversight, and assurance regarding the conduct of RBHS Accountable Persons through the following mechanisms.

1. Peoplecare Managed Services Agreement to manage risks under the *Financial Accountability Regime (FAR)*, including RBHS retaining control for the appointment, and removal of Accountable Persons as well as the minimum oversight and assurance that Peoplecare is required to provide regarding the performance of Peoplecare employees who are Appointed as RBHS Accountable Persons.
2. Regular independent audits of all Accountable Persons to provide assurance that they are effectively managing their Accountability obligations for RBHS.
3. RBHS NRC input to Peoplecare's People and Culture Committee regarding the performance of RBHS Accountable Persons, to help inform performance, remuneration and consequence outcomes of those individuals.
4. Annual meeting between the Chair of the NRC and Peoplecare's People and Culture Committee Chair to obtain assurance and be satisfied that performance management and remuneration practices for persons acting as Accountable Persons for RBHS meet the requirements of this Policy. This may be written engagement between chairs. To assist with this process, a copy of this Remuneration Policy may be made available to Peoplecare's People & Culture Committee.

13. Monitoring and Reporting

Compliance with this policy is monitored by the Peoplecare CPCO and CRO. Any material gaps in policy compliance will be escalated to the CEO, Risk Committee and Board.

Periodic reviews will be conducted by second line and/or third line to provide independent assurance that RBHS has met its obligations under the *Financial Accountability Regime Act*.

14. Notification Obligations

RBHS must notify APRA when certain events impact their compliance with the FAR. RBHS must submit the relevant FAR notification form(s) in APRA Connect within 30 days after the occurrence of a notifiable event.

RBHS must notify APRA when the following occurs:

- An Accountable Person ceases to be an accountable person
- An Accountable Person is dismissed or suspended because the person has failed to comply with their accountability obligations
- An Accountable Person has their variable remuneration reduced because the person has failed to comply with their accountability obligations
- RBHS has reasonable grounds to believe that it has failed to comply with its accountability obligations or key personnel obligations (Accountable Entity breach)
- RBHS has reasonable grounds to believe an Accountable Person has failed to comply with their accountability obligations (Accountable Person breach)
- A material change occurs to information that relates to an Accountable Person and is contained in the FAR register.

RBHS must adhere to the following timeframes for making registration applications to APRA and ASIC:

Scenario	Timeframe
New Accountable Persons that are a Senior Executive or for a Prescribed Responsibility, where this change in APs is foreseen	As soon as it is decided that the individual will become an Accountable Person, and in any case no later than 21 days prior to their commencement to that role.
New AP due to unforeseen or temporary vacancy by the existing AP, for 90 days or more	As soon as it is decided that the individual will become an AP on an ongoing basis, and in any case no later than 69 th day after commencing that role such that the person can be registered with the regulators by day 90.
New director that is elected in a general meeting, or appointed by the Board.	As soon as possible following election or appointment, and in any case no later than the 9 th day following their election (i.e. ensuring the Regulator has time to register the AP by the 30 th day)

The Notification process is managed by the Company Secretary and owned by the CRO.

15. Training

Accountable Persons are responsible for completing mandatory training as part of their induction to ensure they understand their specific accountability obligations and can apply this knowledge in managing their areas of responsibility effectively. Accountable Persons must also complete all other mandatory training annually.

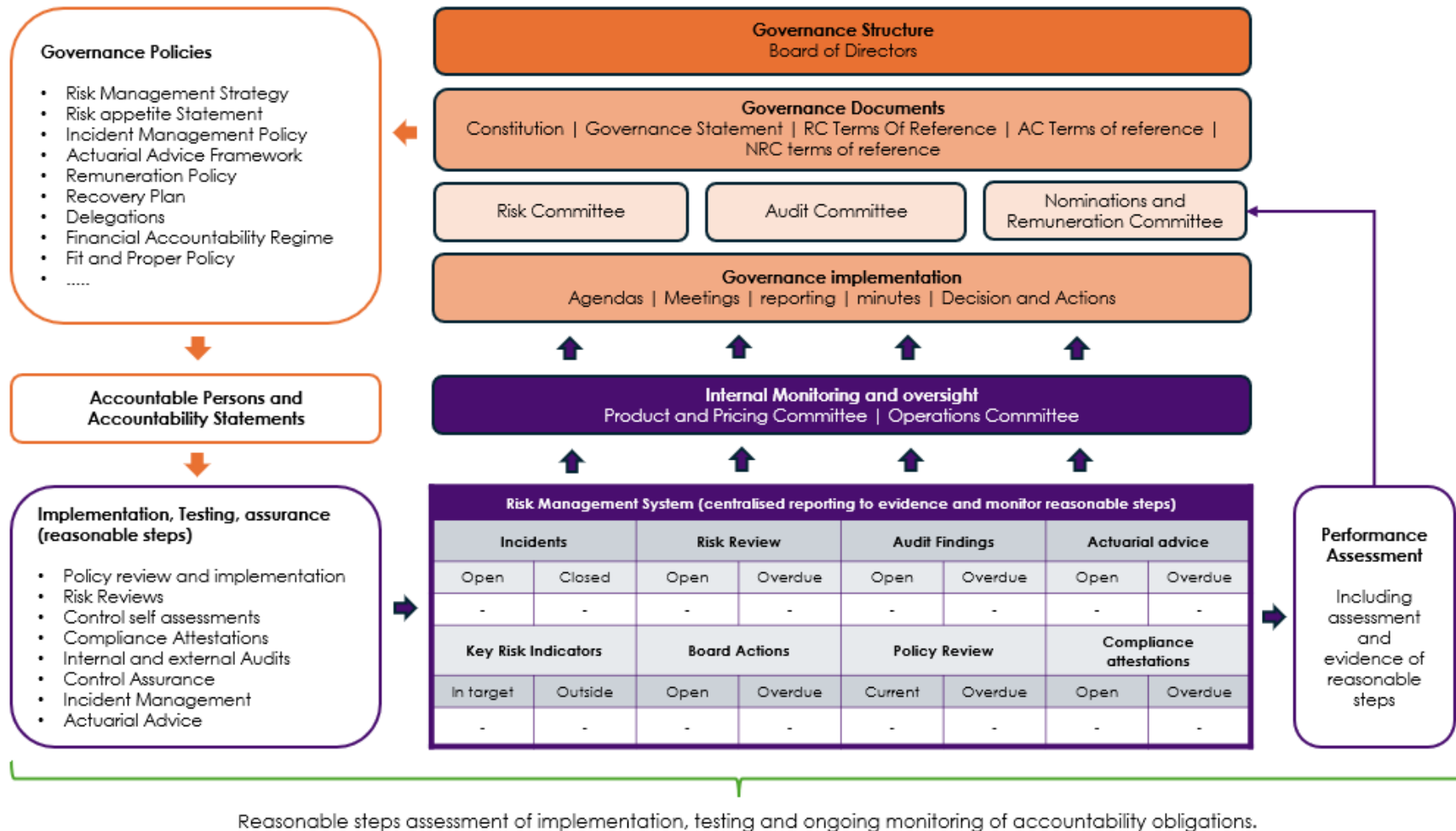
The Peoplecare CPCO is responsible for facilitating a program of learning aligned with FAR obligations. This includes creating tailored, practical programs that equip Accountable Persons with the necessary knowledge and tools to fulfil their obligations. The training program also needs to be updated regularly to reflect any regulatory changes.

Appendix A | Approved Accountable Persons

The following positions are approved accountable Persons as of March 2025.

Position
Board of Directors
Chief Executive Officer
Chief Financial Officer
Chief Risk Officer

Appendix B | Governance Framework to support Reasonable Steps



Appendix C | Declaration of Accountabilities and Reasonable Steps Assessment

As an Accountable Person under the Financial Accountability Regime (FAR), I acknowledge the below information as true and correct:

Name	
Employer	
Position Title	
Position Start Date	
Reporting Manager Title	

As an Accountable Person under the Financial Accountability Regime (FAR), I acknowledge and accept the following accountabilities related to my role within Reserve Bank Health Society Limited (RBHS) as per **Appendix 1**.

I acknowledge and accept responsibility for the effective oversight, implementation, and management of the functions, risks, and obligations within my area of accountability. In fulfilling these responsibilities, I will conduct my duties in accordance with the following principles:

- Acting with honesty, integrity, and due skill, care, and diligence.
- Engaging openly, constructively, and cooperatively with Regulators.
- Taking reasonable steps to prevent matters that could adversely affect the prudential standing or reputation of the accountable entity.
- Taking reasonable steps to prevent material contraventions of any laws specified under s21(d) of the Financial Accountability Regime (FAR) Act.

To support these commitments, I will ensure the following actions are undertaken:

- Establishing and maintaining robust governance, control, and risk management frameworks.
- Implementing safeguards to prevent inappropriate delegation of responsibilities.
- Establishing clear procedures for identifying and addressing problems promptly and effectively.
- Taking proactive measures to ensure compliance with all relevant obligations and standards.
- Responding appropriately and effectively to instances of non-compliance or suspected non-compliance.

Declaration

I, [Employee Name], declare that:

1. The information in this statement is accurate.
2. I understand my accountability obligations.
3. I have read and understand the FAR Policy.
4. I have taken all reasonable steps to fulfil my accountabilities under the Financial Accountability Regime (FAR) and the responsibilities of my role, as outlined in this statement and under legislation.
5. I have implemented and overseen the appropriate policies and controls necessary to ensure the effective management of risks, compliance with obligations, in alignment with the Financial Accountability Regime Policy.
6. I have escalated and addressed, or ensured the resolution of, all known control gaps, risks, and compliance issues in a timely and effective manner.

7. I am not aware of any material breaches or failures to meet accountability obligations within my area of responsibility that have not been appropriately reported or addressed.

Name: _____

Signature: _____

Date: _____

Appendix 1

Area of Responsibility ¹	Description of Responsibility ²	Prescribed or General Responsibility?	Key Function	Joint (yes or no)

Limits and exclusions of responsibilities are listed below

- XX
- XX