Fit and Proper Policy

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### References within this document

Within this document, a reference to Genworth Australia or ‘the Company’ refers to Genworth Mortgage Insurance Australia Limited and its subsidiary companies.

References to the Board are to the Boards of Directors of Genworth Australia and its subsidiary companies unless a specific Board is specified. All References to amounts are in Australian Dollars (AUD).
1. Policy overview

1.1. Policy Statement

This Policy outlines the procedures and requirements under the various legislative and regulatory regimes applicable to Genworth in Australia and New Zealand.

1.2. Purpose

This Fit and Proper Policy ("Policy") is applicable to the following entities:

- Genworth Mortgage Insurance Australia Limited ("GMA")
- Genworth Financial Mortgage Insurance Pty Limited ("GFM Insurance")
- Genworth Financial Mortgage Indemnity Limited ("GFM Indemnity")

(Collectively "Genworth Australia" or the "Company")

The Company is regulated by the Australian Prudential Regulation Authority ("APRA") under the Insurance Act 1973 ("Insurance Act")

This Policy is also applicable to GFM Insurance in its capacity as:

- A credit licensee regulated by the Australian Securities & Investments Commission ("ASIC") under the National Consumer Credit Protection Act 2009 ("NCCP");
- A licensed insurer carrying on business in New Zealand under the Insurance (Prudential Supervision) Act 2010 ("IPSA"); and
- A financial service provider in New Zealand under the Financial Service Providers (Registration & Dispute Resolution) Act 2008 ("FSPA").

GMA is an authorised non-operating holding company ("Authorised NOHC") and the designated ‘parent entity’ of the Level 2 insurance group in Australia under APRA’s Prudential Standards.

GFM Insurance conducts a Lenders Mortgage Insurance ("LMI") business in Australia and New Zealand. In Australia, GFM Insurance is an authorised insurer under the Insurance Act 1973 and (in respect of its borrower recovery activities) holds a credit licence under the NCCP. In New Zealand, GFM Insurance holds a licence to carry on insurance business in New Zealand under IPSA. GFM Insurance has also registered on the Financial Service Providers Register (operated by the New Zealand Companies Office) as an insurer carrying on business in New Zealand.

GFM Indemnity is an insurer authorised under the Insurance Act 1973 to conduct run-off business only.

This Policy forms part of Genworth Australia’s Risk Management Strategy as required by GPS 220 Risk Management, and part of the Risk Management Programme for the purposes of New Zealand insurance regulations.

1.3. Scope

This Policy sets out the manner in which the Company complies with the regulatory requirements described above. It provides information on:
• The Genworth Australia positions which constitute Responsible Person; Fit & Proper People, IPSA “directors and relevant officers” and/or FSPA “directors and senior managers”. Throughout this Policy, these positions are referred to collectively as “Regulated Roles”

• The minimum standards which apply to Regulated Roles

• How the Company assesses the fitness and propriety of candidates for such roles, including the relevant criteria

• The requirements for notifying regulators in relation to people in Regulated Roles

• How the Company complies with the ongoing and regular assessment requirements in relation to Regulated Roles

1.4. Legal and Compliance Requirements

1.4.1. Legal Requirements

The table below summarises the regulatory and legislative requirements that must be met:

<table>
<thead>
<tr>
<th>Act/Regulation</th>
<th>Summary of Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>CPS 520 Fit and Proper</td>
<td>APRA’s Prudential Standard setting out the minimum requirements for determining the fitness and propriety of individuals to hold positions of responsibility at Genworth.</td>
</tr>
<tr>
<td>National Consumer Credit Protection Act 2009</td>
<td>Sets out the relevant requirements applicable to Genworth as a credit licensee</td>
</tr>
<tr>
<td>Insurance (Prudential Supervision) Act 2010 (New Zealand)</td>
<td>Contains the fit and proper requirements in relation to Genworth as a New Zealand insurance licensee</td>
</tr>
<tr>
<td>Financial Service Providers (Registration &amp; Dispute Resolution) Act 2008 (New Zealand)</td>
<td>Applies to insurers which are required to be registered as “financial service providers” in New Zealand</td>
</tr>
<tr>
<td>Fit &amp; Proper standard issued by RBNZ</td>
<td>Prescribes the matters to be taken into consideration when assessing fitness and propriety</td>
</tr>
<tr>
<td>Australian Securities Exchange (“ASX”) Listing Rules and ASX Corporate Governance Principles and Recommendations¹</td>
<td>Under the ASX Listing Rules, the Company was required to ensure each of its directors was of “good fame and character” at the date of listing. ASX has provided guidance that it expects the board of a listed entity to undertake appropriate background checks before appointing a person, or putting forward to security holders a candidate for election, as a director.</td>
</tr>
</tbody>
</table>

¹ ASX Corporate Governance Council, ASX Corporate Governance Principles and Recommendations, 3rd Edition. See also ASX Listed Entities Update 29 September 2011 (Update No. 07/11).
1.4.2. Penalties and Consequences

Non-compliance with this Policy exposes the Company to regulatory sanctions including fines and undertakings. The regulators also have powers to remove an individual from a Regulated Role, or prescribe that a certain role is a Regulated Role requiring a fit and proper check be carried out.

1.4.3. Regulatory Requirements

APRA CPS 520

APRA’s Prudential Standard CPS 520 ("Standard") requires persons who are responsible for the management and oversight of a general insurer ("Responsible Persons") to have appropriate skills, experience and knowledge and to act with honesty and integrity. The Standard sets out the minimum requirements for insurers and authorised NOHCs in determining the fitness and propriety of individuals to hold positions of responsibility. The Standard also requires that Genworth maintain a Board approved, written policy relating to the fitness and propriety of its Responsible Persons, dealing with various prescribed matters set out in the Standard.

NCCP

Under section 47 of the NCCP, GFM Insurance is responsible for ensuring that it maintains the competence to engage in the credit activities authorised by its credit licence. ASIC refers to this obligation as the "organisational competence" obligation and assesses Genworth’s compliance with the obligation by looking at the qualifications and experience of the people who manage the Company’s credit activities, namely those people who are required to meet a fit and proper test. ASIC’s Regulatory Guides RG204 and RG206 provide guidance on how to meet the organisational competence requirements. Genworth must have measures in place to ensure that it maintains its organisational competence at all times, including by conducting regular reviews, for example when completing the annual compliance certificate, which is due to ASIC within 45 days of the anniversary of the licence date.

IPSA (New Zealand)

Section 34 of IPSA requires licensed insurers in New Zealand ("NZ") to have a fit and proper policy applicable to its "directors and relevant officers". "Relevant officers" means the NZ CEO, NZ CFO and NZ Appointed Actuary. The RBNZ has issued Guidelines applicable to licensed insurers and a Fit & Proper standard, the latter of which sets out the particular factors that an insurer must take into consideration when determining a person’s fitness and propriety for a defined position.

FPSA (New Zealand)

As an entity registered on the FSPA, GFM Insurance is required to make various declarations in relation to the fitness and propriety of the company’s directors and “senior managers”, which is defined as a person, other than a director, who occupies a position which allows them to exercise significant influence over the management or administration of the financial service provider. Section 14 of the FSPA sets out the various circumstances in which a director or senior manager would be disqualified from registration (e.g. criminal background, bankruptcy).

ASX

Under the ASX Listing Rules, the Company was required to ensure each of its directors was of “good fame and character” at the date of listing. The ASX Listing Rules do not impose any

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2 RBNZ has granted GFM Insurance a waiver of the requirement for there to be a NZ resident CEO and CFO in relation to the NZ branch, so that the Australian CEO and CFO are instead recognised as the relevant officers for the purposes of IPSA.
equivalent “good fame and character” requirement in relation to directors appointed following admission. ASX has stated that this is on the basis that those directors must submit to an election by security holders and the listed entity has an obligation, in that context, to put all material information about the director in its possession in the notice of meeting proposing his or her election. Security holders therefore get an opportunity to express their opinion on whether the director is of good fame and character and someone to whom they wish to entrust the management of the listed entity.

ASX has also stated that it would expect the board of a listed entity to be undertaking appropriate background checks on any person it proposes to appoint as a director in its own right or to put forward at a meeting of security holders for election as a director.

The ASX Corporate Governance Principles and Recommendations, 3rd Edition (which are effective for GMA commencing with the financial year ending 31 December 2015) state that GMA, as a listed entity, should undertake appropriate checks before appointing a person, or putting forward to security holders a candidate for election, as a director. These checks should include checks as to the person’s character, experience, education, criminal record and bankruptcy history.

GMA is required to disclose in a corporate governance statement forming part of its Annual Report the extent to which GMA has followed the ASX Corporate Governance recommendations during the relevant reporting period.

1.5. Amendments to this Policy

The Fit & Proper Committee ("Committee") will consider updates to this Fit and Proper Policy and submit the Policy to the Company’s Board of Directors for approval every three years or more frequently if required (for example where organisational, legislative or regulatory change requires that the Policy be updated). Any material amendments to this Policy require the approval of the RBNZ.

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4 ASX Listing Rules 4.10.3, 4.7.3 and 4.7.4 and ASX Listing Rules Appendix 4G.
5 Refer to the Fit & Proper Charter for the Committee’s Terms of Reference.
2. GENWORTH REGULATED ROLES

The following table lists the roles at Genworth which are considered to be positions of responsibility under each of the applicable regulatory regimes.

Individuals who fill these roles are usually employees of Genworth, but in some instances may be engaged to provide services to Genworth in some other capacity (e.g. as a consultant). This Policy applies to all individuals who hold a position of responsibility as listed below, regardless of whether they are an employee or engaged in another capacity.

Certain individuals are Responsible Persons under the Standard, as well as Fit & Proper People under RG206, directors/relevant officers under IPSA and directors/senior managers under FSPA. This Policy has been designed to minimise any unnecessary duplication of effort in relation to both the initial and ongoing assessment of Regulated Roles, and the general management of the fit and proper process.

<table>
<thead>
<tr>
<th>Role/position title</th>
<th>APRA Responsible Person (CPS 520)</th>
<th>ASIC Fit &amp; Proper People (Australian Credit Licence)</th>
<th>IPSA Directors &amp; Relevant Officers (NZ)</th>
<th>FSPR Directors &amp; Senior Managers (NZ)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Board of Directors</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Company Secretary</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Chief Executive Officer</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Chief Financial Officer</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Chief Risk Officer</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Chief Commercial Officer</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Chief Operations Officer</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>General Counsel</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Chief Information Officer</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

(Continued over page)
<table>
<thead>
<tr>
<th>Role/position title</th>
<th>APRA Responsible Person</th>
<th>ASIC Fit &amp; Proper People</th>
<th>IPSA Directors &amp; Relevant Officers (NZ)</th>
<th>FSPR Directors &amp; Senior Managers (NZ)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Human Resources Officer</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Risk Leader</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Internal Audit Manager</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Appointed Actuary</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Reviewing Actuary</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Appointed Auditor</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Responsible Auditor&lt;sup&gt;6&lt;/sup&gt;</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>NZ Appointed Actuary</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Loss Management Leader&lt;sup&gt;7&lt;/sup&gt;</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Claims Manager&lt;sup&gt;7&lt;/sup&gt;</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

<sup>6</sup> In relation to a NOHC only.

<sup>7</sup> This role is a “Responsible Manager” for the purposes of Genworth’s credit licence.
3. CRITERIA

3.1. Position descriptions

The role, responsibilities and competencies of each Regulated Role are defined and documented in the relevant position description or terms of engagement.

3.2. Criteria applicable to all covered persons

The following minimum requirements apply to all Regulated Roles at Genworth:

- The person must possess the competence, character, diligence, honesty, integrity and judgment to properly perform the duties of the position;
- The person must not be disqualified by law from holding the relevant position; and
- The person must have no conflict of interest in performing the duties of the position (or in the event that a conflict does exist, the conflict will not create a material risk that the person will fail to properly perform the duties of the position).

When considering the above, the Committee takes into account information relevant to the person’s character, competence, qualifications and experience (pertinent to the duties involved), including the person’s reputation in any relevant business or financial community or market. In doing so, the Committee has particular regard to the information and responses received from, and in relation to, the candidate, as set out in the relevant Fit & Proper Information Packs (Appendix B).

In relation to the appointment of new directors, the Company’s Board Charter applies in addition to this Policy. The Board is responsible for ensuring that it has a mix of directors and Remuneration and Nominations Committee Charter with the necessary skills, experience and independence to meet its objectives.

All individuals in Regulated Roles who are employed by the Company must also satisfactorily complete all general pre-employment screening checks involving police / criminal record checks and the verification of education, professional qualifications and experience, and comply with Genworth’s policies and procedures, including but not limited to:

- Genworth Code of Ethics; and
- Genworth Conflict of Interest Policy.

In addition, Fit & Proper People and proposed new Directors are required to provide a bankruptcy check as part of the assessment process.

Further information on the Company’s general pre-employment screening checks is set out in Annexure A of this Policy.

3.3. Additional requirements: Responsible Managers

ASIC has provided guidance that requires Genworth Australia to provide certain information to ASIC in relation to any “significant non-compliance issues” involving the Responsible Manager in the last 10 years, for example any refusals or restrictions that have been applied in relation to carrying on a trade, business or profession for which an authorisation is required, or any

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8 ASIC Regulatory Guide RG 206 at [206.61].
disciplinary action in relation to such authorisation. Genworth’s Statement of Personal Information, which is required to be completed by candidates, covers these matters and the candidate’s responses must be taken into consideration by the Committee when assessing fitness and propriety. The Committee will, with advice from the General Counsel as appropriate, ensure that any significant non-compliance issues are reported to ASIC in accordance with RG206.

3.4. Additional Requirements – Fit and Proper Criteria

Actuary & Auditors – APRA requirements

Additional criteria are prescribed by the Standard in relation to the Responsible Auditor (if any), the Appointed Auditor, Appointed Actuary and Reviewing Actuary. The Committee takes advice from the Company’s General Counsel in relation to matters relating to the appointment, and ongoing assessment as to fitness and propriety, of these individuals, to ensure that the Company complies with the specific requirements of the Standard.

3.4.1. Appointed Auditor & Responsible Auditor

The following criteria apply in addition to the general criteria described in section 4.2. The person appointed must:

- be a registered company auditor under the Corporations Act;
- be someone other than:
  - the Appointed Actuary of the insurer (or for a Responsible Auditor of a NOHC, the Appointed Actuary of a general insurer which is a subsidiary of the NOHC);
  - an employee or director of an entity of which the Appointed Actuary is an employee or director; or
  - a partner of the Appointed Actuary;
- have a minimum of 5 years relevant experience in the audit of insurers and have experience relating to insurers that has been sufficiently relevant and recent to provide reasonable assurance that the person is familiar with current issues in the audit of insurers;
- be a member of a recognised professional body;
- be ordinarily resident in Australia; and
- meet the independence requirements set out in CPS 510 (the Committee will consult with Legal & Compliance in this regard).

3.4.2. Appointed Actuaries and Reviewing Actuaries

The following criteria apply in addition to the general criteria. The person appointed must:

- have appropriate formal qualifications;
- not be the Chief Executive nor a director of the insurer, or of a related body corporate (except when that related body corporate is a subsidiary of the insurer);
- not be:
  - the Appointed Auditor;
  - for an Appointed Actuary, an employee or director of an entity of which the Appointed Auditor is an employee or director; or
for an Appointed Actuary, partner of the Appointed Auditor;

- have a minimum of 5 years relevant experience in the provision of actuarial services to entities carrying on insurance business and have experience relating to general insurers that is sufficiently relevant and recent to provide reasonable assurance that the person is familiar with current issues in the provision of actuarial services to such entities;

- be a Fellow or Accredited Member of the Institute of Actuaries Australia;

- be ordinarily resident in Australia;

- for Reviewing Actuaries, not be an employee of the insurer; and

- for Reviewing Actuaries where the Appointed Actuary is not an employee of the insurer, not a partner of, or an employee or director of the same firm or company as the Appointed Actuary, or from a related firm or related company.

The Reviewing Actuary may be from the same firm or company as the insurer's Appointed Auditor or from a related firm or related company.

### 3.4.3. IPSA “directors and relevant officers”

The Fit & Proper Standard issued by the RBNZ requires that Genworth take into consideration various prescribed matters, which are captured in the Statement of Personal Information questionnaire which candidates for Regulated Roles are required to complete.

The candidate’s responses in the questionnaire must be taken into consideration by the Committee when assessing fitness and propriety.

In accordance with Guidelines issued by RBNZ the Appointed Actuary (NZ) must:

- be a Fellow of the New Zealand Society of Actuaries Incorporated (or the holder of an equivalent qualification approved by the RBNZ);

- be in a position to exercise independent professional judgment; and

- have sufficient skills and background to ensure they are appropriate for the position.

### 3.4.4. FSPA – “directors and senior managers”

Section 14 of the FSPA sets out the various circumstances in which a director or senior manager would be disqualified from registration as follows:

- an un-discharged bankrupt;

- a person prohibited from being a director or promoter of, or concerned in the management of, an incorporated or unincorporated body under the Companies Act 1993, the Securities Act 1978, the Securities Markets Act 1988, or the Takeovers Act 1993;

- a person subject to a management banning order under the Securities Act 1978, the Securities Markets Act 1988, the Takeovers Act 1993, or subject to an order under section 108 of the Credit Contracts and Consumer Finance Act 2003;

- a person who has been convicted of an offence against section 11, 12, or 41 of the Financial Service Providers (Registration and Dispute Resolution) Act 2008 within the past 5 years;

- a person who has been convicted of an offence under sections 217 to 266 of the Crimes Act 1961 within the past 5 years;

- a person who has been convicted of a money laundering offence or an offence relating to the financing of terrorism;
• a person who is subject to a confiscation order under the Proceeds of Crime Act 1991.

These matters are captured in the Statement of Personal Information questionnaire which candidates for Regulated Roles are required to complete. As noted above, the candidate’s responses must be taken into consideration by the Committee when assessing fitness and propriety.

3.4.5. Qualification, Experience and CPD Requirements – Responsible Managers

Specific qualification and experience requirements are set out in RG206 in relation to the above listed ASIC Fit & Proper People, who are directly involved in the management of credit activities.

All Responsible Managers:

• are required to hold a qualification which is appropriate for the particular role and which is either a credit industry qualification to at least a Certificate IV level, or another general higher level qualification (e.g. a diploma or university degree) in a relevant discipline; and

• must also have at least two years of relevant experience that is not marred by significant non-compliance issues (e.g. where ASIC or a state regulator has taken action against the person).

Responsible Managers are required to keep up to date with credit industry and regulatory developments in order to provide sound leadership. Accordingly, a minimum number of hours of continuing professional development (“CPD”) is required as set out in RG206. The Committee will enquire into, and take into consideration, a Responsible Manager’s completion of CPD hours when conducting their ongoing and annual re-assessment as described in this Policy.

3.5. Additional Matters that may be Considered

In addition to the general and specific criteria described above, the Committee may also consider any other information that it considers relevant in relation to the candidate for appointment, for example information obtained through annual performance development reviews, annual global leadership reviews, and the annual acknowledgement of integrity.
4. ASSESSMENT PROCESS

4.1. Timing

A fit and proper assessment must be carried out:

- Prior to appointment of an individual to a Regulated Role;
- Annually (refer below for further details regarding the reassessment process); and
- In the event that Genworth becomes aware of any information that may result in a person in a Regulated Role being assessed as not fit and proper; and after gathering further information, the Committee concludes that a material fitness and propriety concern does exist.

4.2. Who is responsible?

Fit and Proper assessments are carried out by the Fit and Proper Committee in accordance with this Policy and the Committee’s Terms of Reference, which are set out in the Fit & Proper Committee Charter.

The Chief Human Resources Officer is responsible for the administration of fit and proper assessments for all candidates for Regulated Roles in accordance with this Policy. This includes a duty to undertake reasonable enquiries to collect sufficient information so that the Committee can make a prudent assessment of the person against the fit and proper criteria applicable, as set out in this Policy.

4.3. Initial assessment

The Chief Human Resources Officer is responsible for undertaking the following in relation to fit and proper assessments prior to the appointment of a candidate to a Regulated Role:

- Providing a copy of this Policy to the candidate prior to the fit and proper assessment taking place;
- Reviewing any information and documentation already held by Human Resources in relation to the candidate to determine if it may be used in the fit and proper assessment;
- Obtaining any necessary consents from the candidate to conduct the checks referred to in Appendix A of this Policy;
- Obtaining the initial fit and proper statements and declarations\(^9\) from the candidate;
- Gathering the supporting documents and information required for the fit and proper assessment;
- Providing a summary report to the Committee, including a recommendation, in relation to the fitness and propriety of the candidate, to enable the Committee to undertake an appropriate assessment of the candidate against the relevant criteria listed in this Policy;
- Maintaining all records relating to the fit and proper assessment process as described in this Policy, including keeping copies of all documents and information gathered during the assessment and re-assessment processes.

\(^9\) Refer Appendix B
In order to be considered for a Regulated Role, the candidate must provide Human Resources with:

- Consent for the Company to obtain the necessary police and other background checks (including bankruptcy check) and to release this information to the relevant regulatory authorities if required;
- Completed Statement of Personal Information;
- Evidence of qualifications and experience (if requested); and
- Any other information relevant to the fit and proper assessment as may be requested by the Committee.

The Chief Human Resources Officer will ensure that the following compulsory checks are carried out in relation to all Regulated Roles:

- Police / criminal record check;
- A search of APRA’s online Disqualification Register;
- A search of ASIC's online Register of Banned and Disqualified Persons; and
- A search of NZ Companies House Register of Disqualified Directors.

Where considered appropriate by the Chief Human Resources Officer or the Committee (or as required by this Policy), the following additional checks may also be carried out:

- Police / criminal record checks in overseas jurisdictions where the candidate has resided in the last 10 years;
- Obtaining business references (within Genworth and externally);
- Searches of other regulatory or professional registers to confirm that the candidate has not been disqualified or banned;
- Obtaining evidence of eligibility to work in Australia (or NZ, as applicable);
- Confirming professional memberships;
- Academic checks;
- Confirming employment history (including a review of the personnel file where the individual is existing Genworth staff member);
- Media checks; and
- Investigation of any other matter that a member of the Committee or the Compliance Manager deems material in the circumstances.

The information obtained as part of the fit and proper assessment process may include “sensitive information” as defined in the Privacy Act 1988 (Cth)\(^\text{10}\). Under the Privacy Act, information

\(^{10}\) In the Privacy Act 1988 (Cth) “sensitive information” is defined as:

(a) information or an opinion about an individual's:

(i) racial or ethnic origin; or
(ii) political opinions; or
(iii) membership of a political association; or
(iv) religious beliefs or affiliations; or
(v) philosophical beliefs; or
(vi) membership of a professional or trade association; or
(vii) membership of a trade union; or
(viii) sexual preferences or practices; or
collected previously by the Company in respect of a candidate may be used in making any fit and proper assessments carried out at a later date. However, information that is unlikely to be material need not be collected, and information regarding "spent convictions" as defined in the *Crimes Act 1914* (Cth)\(^\text{11}\) will not be obtained (or if obtained inadvertently, no consideration will be given to such information).

### 4.4. Re-assessments

The Standard, RG206 and the RBNZ Guidelines contain provisions relating to the regular re-assessment of those in Regulated Roles. The FSPA also requires that GFM Insurance lodge an annual confirmation each year in order to maintain its registration. In order to meet these obligations, the Company will conduct a re-assessment of all relevant persons on an annual basis by 31 January of each year\(^\text{12}\). The results of the re-assessment are reported to the Fit & Proper Committee and the Board of Directors.

In relation to the annual fit and proper re-assessments, the Chief Human Resources Officer must:

- Provide a copy of this Policy to the person;
- Obtain a Fit and Proper Declaration reaffirming the initial declarations and statements made by the person (Appendix C);
- Gather any the supporting documents and information required for the assessment;
- Provide a summary report to the Committee, including a recommendation, in relation to the fitness and propriety of the person; and
- Maintain all records relating to the fit and proper re-assessment process as described in this Policy, including keeping copies of documents and information gathered.

When advised of the need for an annual re-assessment, the candidate will provide the Fit & Proper Committee with:

- An annual declaration reaffirming the initial declarations and statements as to fitness and propriety; and
- any other information relevant to the assessment as requested by the Committee.

---

\(^{11}\) Section 85ZM of the *Crimes Act 1914* (Cth) provides that a person's conviction is spent if:

(a) the person has been granted a pardon; or

(b) the person was not sentenced to imprisonment, or was not sentenced to imprisonment for more than 30 months, and the waiting period has ended (10 years from the date of conviction, or 5 years if convicted as a minor).

\(^{12}\) The Standard requires that the reassessment be carried out annually, or as close to annually as is practicable. Under NCCP, GFM Insurance and GFM Indemnity must lodge an annual Compliance Certificate with ASIC within 45 days of the anniversary of the granting of the credit licence (which is 1 January each year). Accordingly, reassessments are completed in January of each year to enable submission of the completed Compliance Certificate in February of that year. The completion of an annual review satisfies the RBNZ requirement for a review to be conducted at least every three years.
4.5. **Outcome of assessments**

Subject to section 5.6 of this Policy, a person cannot be appointed to a Regulated Role until a satisfactory fit and proper assessment has been completed.

There is also an exception under the Standard, in that an individual may be appointed to a Responsible Person role, notwithstanding that a satisfactory fit and proper assessment has not been completed, if:

- They hold the position because of a resolution of members (shareholders) of the Company; or
- APRA has determined that the person is a Responsible Person;
  
  provided that the assessment is complete within 28 days of the person becoming the holder of a Regulated Role.

In the case of re-assessments, where a person was previously assessed as fit and proper but the Company subsequently becomes aware of information that may result in the person being assessed as not fit and proper, then the Committee must take all reasonable steps to ensure that it can prudently conclude that no material fitness and propriety concerns exist. Where a concern does exist, then a full fit and proper assessment must be conducted.

4.6. **Interim appointments**

Subject to the approval of the Fit & Proper Committee, the company may make interim appointments to Regulated Role position without a full fit and proper assessment for a period of up to 90 days (or longer with APRA’s written agreement in the case of Responsible Person roles) including any prior period of interim appointment.

It is envisaged that such interim appointments will generally only be appropriate in the case of internal candidates appointed to a Regulated Role (for example, in an ‘acting’ capacity or otherwise where an urgent need arises). However, prior to making any such interim appointment the Committee will make such enquiries as it considers appropriate to determine whether the person is suitable to take up the role on an interim basis, including for example conducting a search of the ASIC, APRA and NZ Companies Office disqualification registers and obtaining satisfactory business references (external or internal).

Special requirements apply in relation to any changes of Responsible Manager (i.e. it is a condition of Genworth’s credit licence that the company inform and consult with ASIC within 5 business days). As such the Committee will take advice from the Legal & Compliance department in relation to changes of Responsible Manager.

A full fit and proper assessment must be completed prior to appointing the person to the Regulated Role on a permanent basis.

4.7. **Actions to be taken by Genworth if it is determined that a person is not Fit and Proper for a position**

In the event that, after obtaining appropriate evidence and advice, the Committee assesses that a particular person is not fit and proper for a Regulated Role, the person has the right to discuss with the Committee the information obtained as part of the assessment and to make submissions to the Committee.

Where a person is found to be not fit and proper due to matters relating to character, honesty or integrity, that person would not normally be suitable for any position at Genworth.
However, it is possible that due to lack of relevant experience or a conflict of interest, a particular person could be assessed as not fit and proper for a particular Regulated Role, but is still suitable for another position in the company. In this instance, the person’s responsibilities could be redefined pending further enquiries or until the person receives further training or experience.

In the event that, after considering all relevant information and submissions, the Committee determines that the person is not fit and proper for the role:

- The Committee will take all prudent steps to ensure that the person is not appointed to the position, or is removed from the position as soon as practicable, and to notify the relevant regulator(s) as required under section 5 of this Policy. The Committee shall inform the Board of these matters, prior to notifying a regulator. Action taken may entail a formal request from the Committee (or the Board) to Human Resources to implement measures, in accordance with standard Genworth Human Resources practices, to address the concerns raised (which may ultimately include termination of the individual’s employment in more serious circumstances). APRA and RBNZ also have powers to require removal or disqualification of a person from certain positions;

- In respect of directors, the Committee will notify the Chairman of the Board of any findings that a director is not fit and proper. In respect of all other personnel, the Committee will notify the Chairman of the Board and the CEO;¹³

- If the person is a director, regard must be had for the constitution of the relevant entity and other regulatory requirements when removing any director in these circumstances;

- The Secretary of the Committee must notify the relevant regulator(s) as required; and

- A suitable replacement person must be sought and appointed in accordance with the procedures set out in this Policy.

¹³ Should the Chairman have a conflict of interest or be unavailable, the second most senior director on the Board should be notified. Similarly, should the CEO have a conflict of interest or be unavailable, the second most senior member of the Company’s management should be notified.
## 5. REPORTING TO REGULATORS

The Secretary of the Committee is responsible for notifying the regulators of changes to appointments as set out below.

<table>
<thead>
<tr>
<th>Event</th>
<th>Notification required (timeframe)</th>
<th>APRA</th>
<th>ASIC</th>
<th>RBNZ (re IPSA)</th>
<th>NZ Companies Office (re FSPR)</th>
</tr>
</thead>
<tbody>
<tr>
<td>New appointment</td>
<td>Yes (within 28 days of date of appointment)</td>
<td>Non-Responsible Manager roles:</td>
<td>Directors:</td>
<td>Yes (required to update FSPR whenever changes to directors/senior managers made. Also, submission of annual confirmation required in February of each year.)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Yes (in Annual Compliance Certificate only)</td>
<td>No (pursuant to exemption granted by RBNZ, there is no ongoing requirement to report new directors' appointments)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Responsible Manager:</td>
<td>Relevant officers:</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Yes (it is a condition of Genworth’s credit licence that the company inform and consult with ASIC within 5 business days of change).</td>
<td>Yes (copy of fit and proper certificate to be provided within 20 &quot;working days&quot; of new appointment)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Event</td>
<td>Notification required (timeframe)</td>
<td>APRA</td>
<td>ASIC</td>
<td>RBNZ (re IPSA)</td>
<td>NZ Companies Office (re FSPR)</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| Resignation, retirement or removal                                    | Yes (within 28 days of the person's resignation, retirement or removal)                                                                                                                                                     | Non-Responsible Manager roles:  
Yes (in Annual Compliance Certificate only)  
Responsible Manager:  
Yes (it is a condition of Genworth’s credit licence that the company inform and consult with ASIC within 5 business days of change). | Not specified                                                       | Yes (required to update FSPR whenever changes to directors/senior managers made. Also, submission of annual confirmation required in February of each year.) |
| Any other changes to information previously provided to regulator (e.g. change of name, change of role). | Yes (within 28 days of the change)                                                                                                                                                                                                 | Yes (in Annual Compliance Certificate only)                           | Not specified                                                       | Yes (required to update FSPR whenever changes to directors/senior managers made. Also, submission of annual confirmation required in February of each year.) |
| Assessment that a person is not fit & proper                        | Yes (within 10 days of the assessment date) including reasons for person remaining in role, if relevant.                                                                                                                                 | Not specified, but refer above re resignations, retirements & removals | Not specified, but refer above re resignations, retirements & removals | Not specified, but refer above re resignations, retirements & removals                                                              |
| Ad hoc requests from APRA for information relating to fitness and propriety of a person | As required by APRA                                                                                                                                                                                                           | As required by ASIC                                                 | As required by RBNZ                                                | As required by Companies Office                                                                                                   |
6. WHISTLEBLOWING

All Genworth Australia staff are encouraged to advise the Committee, via Human Resources and/or Legal & Compliance, of any information that they reasonably believe may be material to the assessment (initial or ongoing) of an individual in a Regulated Role. For details of the relevant communication channels, staff should refer to the procedures for raising integrity concerns in “Integrity First”, Genworth’s Code of Ethics.

Concerns may also be raised anonymously via the Genworth Australia Ombudsperson, whose details are also noted in the Code of Ethics and on the Company’s intranet.

Any staff member who believes that Genworth Australia has not complied with the Standard has the right to notify APRA of that belief and the reasons for it. However, there is no obligation to do so. Genworth encourages staff to have recourse to the appropriate channels within Genworth in the first instance. Any disclosure made in good faith will not have any detrimental effect on the disclosing individual’s employment or tenure with Genworth.

As required by the Standard, Genworth Australia consents to:

- Any person notifying Human Resources and/or Legal & Compliance and/or APRA if they believe that a Responsible Person does not meet Genworth Australia’s fit and proper criteria as set out in this policy, and the reasons for that belief; and

- Any person that was a Responsible Person disclosing information or providing documents to APRA relating to their reasons for resignation, retirement or removal.

However, such disclosure must be made in good faith. If Genworth Australia is satisfied that the notification was not made in good faith, disciplinary action may be invoked.

This Policy does not require any person to make a disclosure to the Committee about a person in a Regulated Role, via the whistleblowing procedures or to a regulator.14

The Human Resources department is required to communicate to directors and employees of Genworth Australia the provisions of this Policy and the Insurance Act that deal with whistleblowing.

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14 Note however, that auditors and actuaries may have statutory requirements requiring reporting, that override this Policy
Appendix A.

A.1. Pre-Employment Background Checking Procedure

Genworth has a full background checking procedure in place for all permanent and temporary hires.

A.1.i. Permanent Hires & Temporary Hires over 6 Months

We require the following information and documents for each successful candidate:

- CV
- Completed and signed Genworth application form
- Completed and signed Background Checklist Form
- Original birth certificate, permanent residency or work permit
- Driver’s licence or passport
- 2x Reference checks to include positions held and duration of employment over the past five years – documentation on names of referees and contact details
- Compliance Forms – to be completed after reading the Code of Ethics

A.1.ii. Permanent Hires – New Starter Documentation

We also require the following completed new starter documentation for Permanent hires – these will be sent to either the agency or employee directly:

- Offer Letter
- Tax Declaration Form
- Bank and Personal Details Form
- Conflicts of Interest Questionnaire
# New Hire Checklist

## New Hire Checklist

**Employee Name:** ____________________________  **Start Date:** __/__/__

### Completed and Signed Original Documentation

<table>
<thead>
<tr>
<th>Item</th>
<th>Yes</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Offer of Letter - Signed</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tax Declaration Form</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bank and Personal Details Form</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conditions of Employment Acknowledgement</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Questionnaire on Avoiding Conflicts of Interest</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compliance Documentation Form</td>
<td></td>
<td></td>
</tr>
<tr>
<td>100 points identification</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CV</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reference Checks</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Police Check - Precise</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employment Application Form / Employment History Check - Precise</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### HR Completion

<table>
<thead>
<tr>
<th>Item</th>
<th>Yes</th>
<th>N/A</th>
</tr>
</thead>
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<tr>
<td>Enter into Movements spreadsheets</td>
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<td></td>
</tr>
<tr>
<td>Request to Recruit Form Approved</td>
<td></td>
<td></td>
</tr>
<tr>
<td>New Starter Details Form Approved</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Police checked submitted to Precise Background</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employment background check submitted to Precise (5 or 10 year as req’d)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employee checked against DFA Watchlist and ASIC Banned &amp; Disqualified List</td>
<td></td>
<td></td>
</tr>
<tr>
<td>VEVO check completed</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Letter completed</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Updated: 30 April 2013*
Appendix B.

B.1. Genworth Statement of Personal Information

*Fit & Proper People Statement of Personal Information*
Fit & Proper Assessment

Genworth Financial Statement of Personal Information

Name: 

Position: 

Please consider the following questions carefully. We will rely on this information to assess if you are ‘fit and proper’ to perform your role in the management of our business. Your responses must be true and accurate and must not be misleading.

If you do not understand the question, or are unsure how to answer, please ask for an explanation.

Within the last 10 years, whether in Australia or Overseas, have you:

Licenses, Authorisation

1. Ever been refused the right, or been restricted in the right, to carry on any trade, business or profession for which an authorisation (license, certificate, registration or other authority) is required by law?  
   - [ ] Yes  [ ] No

2. Ever been subject to disciplinary action in relation to any such authorisation?  
   - [ ] Yes  [ ] No

3. Ever been the subject of any investigations or proceedings that are current or pending and which may result in disciplinary action being taken in relation to any such authorisation?  
   - [ ] Yes  [ ] No

4. Ever been engaged in the management of any companies / businesses that have had a Corporations Act 2001 (or previous corresponding laws) licence cancelled?  
   - [ ] Yes  [ ] No

5. Ever (a) failed to comply with directions given by the Reserve Bank of New Zealand (RBNZ) or any regulator/supervisor outside of New Zealand; or (b) obstructed or hindered RBNZ or an overseas regulator or supervisor in the exercise or performance of its powers, functions or duties under any applicable law?  
   - [ ] Yes  [ ] No

Professional Memberships, Accreditation and Indemnity Insurance

6. Ever been reprimanded, or disqualified or removed, by a professional or regulatory body or External Dispute Resolution scheme in relation to matters relating to your honesty, integrity or business conduct?  
   - [ ] Yes  [ ] No

7. Ever had any past, present or pending claim made against a Professional Indemnity insurance policy in relation to advice you have tendered?  
   - [ ] Yes  [ ] No

8. Ever been refused of Professional Indemnity insurance?  
   - [ ] Yes  [ ] No

9. Ever been denied accreditation by a lender, mortgage manager or mortgage insurer?  
   - [ ] Yes  [ ] No

10. Ever had your accreditation cancelled or suspended by a lender, mortgage manager or mortgage insurer, other than for volume?  
    - [ ] Yes  [ ] No
reasons, or had your membership of an aggregator or franchise group terminated, or is similar action pending against you?

Names

11. Ever carried on business under any name other than the name or names previously notified to ASIC?  □ Yes  □ No
12. Known by any name other than the name or names previously notified to ASIC?  □ Yes  □ No

Offences

13. Been prohibited from being a director or promoter of, or concerned in the management of, an incorporated or unincorporated body, or been subject to a management banning order or an order prohibiting you from carrying out certain business or professional activities?  □ Yes  □ No
14. Been the subject of administrative, civil or criminal proceedings or enforcement action, which were determined adversely to you (including by you consenting to an order or direction, or giving an undertaking not to engage in unlawful or improper conduct) in any country?  □ Yes  □ No

Solvency

15. Been declared bankrupt or insolvent under administration, or is there any such action pending?  □ Yes  □ No
16. Engaged in the management of any companies / businesses that have had an external administrator appointed, or which have entered into a compromise, or scheme of arrangement, with its creditors?  □ Yes  □ No
17. Engaged in the management of any companies / businesses that were declared insolvent, put into liquidation, receivership or otherwise wound up or dissolved on the basis that it could not pay its debts when due?  □ Yes  □ No
18. Engaged in the management of any companies / businesses that were declared the equivalent of insolvent or subject to statutory or judicial management under the law of an external territory or country other than Australia?  □ Yes  □ No

If you answered ‘yes’ to any question in the Statement of Personal Information, please attach an explanation of each matter including:

- The judgement and if it has been satisfied;
- For a declaration of bankruptcy or insolvency:
  - date of the declaration and district in which it was made
  - Bankruptcy number.

For a deed of arrangement, assignment or where creditors have accepted a composition under Part X of the Bankruptcy Act 1996 or equivalent overseas legislation:

- Date of the deed of arrangement, assignment or the special resolution accepting composition and the district in which it was made;
- Name and address of the trustee of the deed of arrangement, assignment or of the composition, and
- Identifying number used in relation to the deed of arrangement, assignment or the composition in the office of the Registrar in Bankruptcy.

EXPLANATION OF EVENTS AND OTHER RELEVANT FACTUAL INFORMATION
Responsible Managers

Educational Qualifications
Complete this information if you are a responsible manager.
You must provide details of educational qualifications relevant to your responsibilities for Genworth’s Australian credit licence.

<table>
<thead>
<tr>
<th>Institution</th>
<th>Course name</th>
<th>Year of Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
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</tr>
</tbody>
</table>

Educational Qualifications
You must provide details of your employers where experience relevant to your responsibilities for Genworth’s Australian credit licence was gained.

<table>
<thead>
<tr>
<th>Employer</th>
<th>Job Title (including division if applicable)</th>
<th>Start and End Dates with this employer</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<td></td>
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</tr>
</tbody>
</table>

I certify that I have completed the information requested in the ‘Genworth Financial Statement of Personal Information’ form to the best of my knowledge and belief and I declare that the information is complete, accurate and true.

Signature: [Signature]
Date: [Date]

1 Someone Genworth relies on to demonstrate that Genworth is competent to engage in credit activities.
Fit & Proper Cover Letter

[Name],

[Address]

[Date]

Dear [Name],

Fit & Proper Assessment

As you may be aware, regulations issued by the Australian Prudential Regulation Authority (APRA), the Australian Securities & Investments Commission (ASIC) and the Reserve Bank of New Zealand (RBNZ), set out the minimum standards for determining the fitness and propriety of individuals holding positions of responsibility at Genworth.

Genworth has a Fit & Proper Policy which reflects the requirements of the applicable regulations, and which is also designed to assist those in positions of responsibility to understand and comply with their fit and proper obligations. I have enclosed a copy of the Policy for your review.

Subject to the conditions outlined in the terms of your engagement or offer of employment, you are to be appointed as [position title], which is a position of responsibility under Genworth’s Fit & Proper Policy. In order to facilitate the formal assessment of your fitness and propriety to hold the position, we require you to provide certain information and documentation as set out in this letter.

Please find enclosed the following documents for completion and return at your earliest convenience:

- Genworth Financial Statement of Personal Information
- Consents for Precise Background Services Pty Limited to conduct background checks on our behalf, including the Australian Federal Police Check. Please note that a criminal history check must be conducted in each country in which you have resided during the past 10 years. Accordingly, please contact me to discuss the procedure for conducting any necessary checks in countries other than Australia.
- Conflict of Interest Questionnaire
- “New starter” pack containing compliance information and declarations

Should you have any queries about the fit and proper assessment process, please do not hesitate to contact me on 02 8248 2295.

Yours sincerely,

Jo Ann Rabitz
Chief Human Resources Officer
Appendix C.

C.1. Reassessment Questionnaire

Genworth Financial Statement of Personal Information

Name: 
Position: 

Please consider the following questions carefully. We will rely on this information to assess if you are ‘fit and proper’ to perform your role in the management of our business. Your responses must be true and accurate and must not be misleading.

If you do not understand the question, or are unsure how to answer, please ask for an explanation.

Within the last year, whether in Australia or Overseas, have you:

License, Authorisation
1. Been refused the right, or been restricted in the right, to carry on any trade, business or profession for which an authorisation (license, certificate, registration or other authority) is required by law? ☐ Yes ☐ No
2. Been subject to disciplinary action in relation to any such authorisation? ☐ Yes ☐ No
3. Been the subject of any investigations or proceedings that are current or pending and which may result in disciplinary action being taken in relation to any such authorisation? ☐ Yes ☐ No
4. Been engaged in the management of any companies / businesses that have had a Corporations Act 2001 (or previous corresponding laws) licence or an Australian credit licence cancelled? ☐ Yes ☐ No
5. Ever (a) failed to comply with directions given by the Reserve Bank of New Zealand (RBNZ) or any regulator/supervisor outside of New Zealand, or (b) obstructed or hindered RBNZ or an overseas regulator or supervisor in the exercise or performance of its powers, functions or duties under any applicable law?

Professional Memberships, Accreditation and Indemnity Insurance
6. Been reprimanded, or disqualified or removed, by a professional or regulatory body or External Dispute Resolution scheme in relation to matters relating to your honesty, integrity or business conduct? ☐ Yes ☐ No
7. Had a claim made against a Professional Indemnity insurance policy in relation to advice you have tendered? ☐ Yes ☐ No
8. Been refused of Professional Indemnity insurance? ☐ Yes ☐ No
9. Been denied accreditation, or had your accreditation cancelled or suspended by a lender, mortgage manager or mortgage insurer, other than for volume reasons, or had your membership of an aggregator or franchise group terminated, or is similar action pending against you?

Names
10. Carried on business under any name other than the name or names shown in this form? ☐ Yes ☐ No

Offences
11. Been prohibited from being a director or promoter of, or concerned in ☐ Yes ☐ No

Genworth Financial Statement of Personal Information (Existing Fit & Proper Person)
the management of, an incorporated or unincorporated body, or been subject to a management banning order or an order prohibiting you from carrying out certain business or professional activities?  

12. Been the subject of administrative, civil or criminal proceedings or enforcement action, which were determined adversely to you (including by you consenting to an order or direction, or giving an undertaking not to engage in unlawful or improper conduct) in any country?  

☐ Yes ☐ No

Solvency

13. Been declared bankrupt or insolvent under administration, or is there any such action pending?  

☐ Yes ☐ No

14. Been engaged in the management of any companies / businesses that have had an external administrator appointed, or which have entered into a compromise, or scheme of arrangement, with its creditors?  

☐ Yes ☐ No

15. Been engaged in the management of any companies / businesses that were declared insolvent, put into liquidation, receivership or otherwise wound up or dissolved on the basis that it could not pay its debts when due?  

☐ Yes ☐ No

16. Been engaged in the management of any companies / businesses that were declared the equivalent of insolvent or subject to statutory or judicial management under the law of an external territory or country other than Australia?  

☐ Yes ☐ No

If you answered 'yes' to any question in the Statement of Personal Information, please attach an explanation of each matter including:

- The judgement and if it has been satisfied;
- For a declaration of bankruptcy or insolvency:
  - date of the declaration and district in which it was made
  - Bankruptcy number.

For a deed of arrangement, assignment or where creditors have accepted a composition under Part X of the Bankruptcy Act 1966 or equivalent overseas legislation:

- Date of the deed of arrangement, assignment or the special resolution accepting composition and the district in which it was made;
- Name and address of the trustee of the deed of arrangement, assignment or of the composition, and
- Identifying number used in relation to the deed of arrangement, assignment or the composition in the office of the Registrar in Bankruptcy.

EXPLANATION OF EVENTS AND OTHER RELEVANT FACTUAL INFORMATION  
(Please specify the question number when providing further particulars)

I certify that I have completed the information requested in the 'Genworth Financial Statement of Personal Information' form to the best of my knowledge and belief and I declare that the information is complete, accurate and true.

Signature: Date:

Genworth Financial Statement of Personal Information (Existing Fit & Proper Person) 2
Appendix D. Document information

NOTE: This is a controlled document. Its accuracy and currency can only be guaranteed when viewed in electronic PDF format obtained directly from the Operational Control Framework document repository.

1. Version history

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<td>18 February 2015</td>
</tr>
</tbody>
</table>

2. Reference documents

The following documents have been referenced in the preparation of this policy.

<table>
<thead>
<tr>
<th>Ref.</th>
<th>Document name</th>
<th>Business owner</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Board Charter</td>
<td>Board</td>
</tr>
<tr>
<td>2.</td>
<td>Remuneration &amp; Nominations Committee Charter</td>
<td>Board</td>
</tr>
<tr>
<td>3.</td>
<td>Fit &amp; Proper Committee Charter</td>
<td>Board</td>
</tr>
<tr>
<td>4.</td>
<td>Risk Management Strategy (RMS)</td>
<td>Chief Risk Officer (CRO)</td>
</tr>
<tr>
<td>5.</td>
<td>IT Security Manual</td>
<td>Chief Information Officer</td>
</tr>
<tr>
<td>6.</td>
<td>Operational Control Framework (OCF) Policy</td>
<td>General Counsel &amp; Company Secretary</td>
</tr>
</tbody>
</table>