

15th June 2026

Ms Eva Scheerlinck
Scheerlinck Consulting

By email: evascheerlinck@gmail.com
CC: code@coba.asn.au.

Subject: Response to 2025–26 Customer Owned Banking Code of Practice Interim Report

Dear Eva,

Thank you for the opportunity to provide feedback on the 2025–26 Customer Owned Banking Code of Practice Interim Report. We appreciate the extensive work undertaken to review and strengthen the Code and we acknowledge the importance of ensuring it remains fit-for-purpose, practical, and customer-focused.

We wish to express our broad support for the Interim Report and, in particular, we support all Recommendations with the exception of Recommendations 21–27 inclusive (Section 6 – *First Nations perspectives on banking*).

Our concerns regarding these recommendations are as follows:

1. Principle of Equal Treatment

We are concerned that Recommendations 21–27 risk establishing differentiated obligations based on race. As a customer-owned institution, we believe strongly in principles of fairness, equity, and equal treatment for all members. While we fully support efforts to improve accessibility and inclusiveness across the banking system, we are of the view that obligations within the Code should be framed in a way that applies consistently to all customers, rather than singling out specific groups based on racial or ethnic identity.

We believe that a universal, needs-based approach—focused on vulnerability, accessibility, and financial inclusion more broadly—would better align with these principles while still achieving the intended outcomes.

2. Operational and Cost Implications

The proposed recommendations would require subscribers to develop and maintain specialised processes, training programs, and access to external support services such as counsellors, community workers, and translators.

For many mutual institutions, particularly smaller entities, the scenarios contemplated in these recommendations are unlikely to arise with sufficient frequency to justify the significant investment required. As a result, these measures would impose disproportionate and ongoing costs on the broader membership base, without a commensurate benefit.

Given the member-owned nature of our sector, it is important that any new obligations are proportionate, scalable, and reflective of the actual risk and usage patterns of individual institutions.

Suggested Alternative Approach

We respectfully suggest that the objectives underpinning Section 6 could be more effectively achieved by:

- Embedding flexibility within the Code to allow institutions to respond to the specific needs of their customer base
- Expanding existing provisions relating to vulnerable customers and accessibility
- Encouraging (rather than mandating) engagement with specialist services where appropriate
- Providing guidance rather than prescriptive requirements, particularly for smaller mutuals

Conclusion

We remain supportive of the broader direction of the Interim Report and commend the effort to enhance protections and service standards across the sector. However, we believe that Recommendations 21–27, as currently framed, should be reconsidered to ensure they are consistent with principles of fairness, proportionality, and operational practicality.

We would welcome the development of alternative approaches that achieve inclusive outcomes while maintaining a balanced and sustainable Code framework.

Yours sincerely,



David Cadden
CEO
The Mac