

Modern Slavery Statement 2025

About this Statement

This joint Modern Slavery Statement is made in accordance with the Australian *Modern Slavery Act 2018* (Cth) (**Act**). It covers the steps taken by Teachers Mutual Bank Limited (**TMBL**) and its owned and controlled entity, EdSec Funding Trust No 1 (**EdSec**), during the financial year ending 30 June 2025 to identify, manage and mitigate the specific risks of modern slavery in its operations and supply chain. This statement is a joint statement made by TMBL and EdSec.

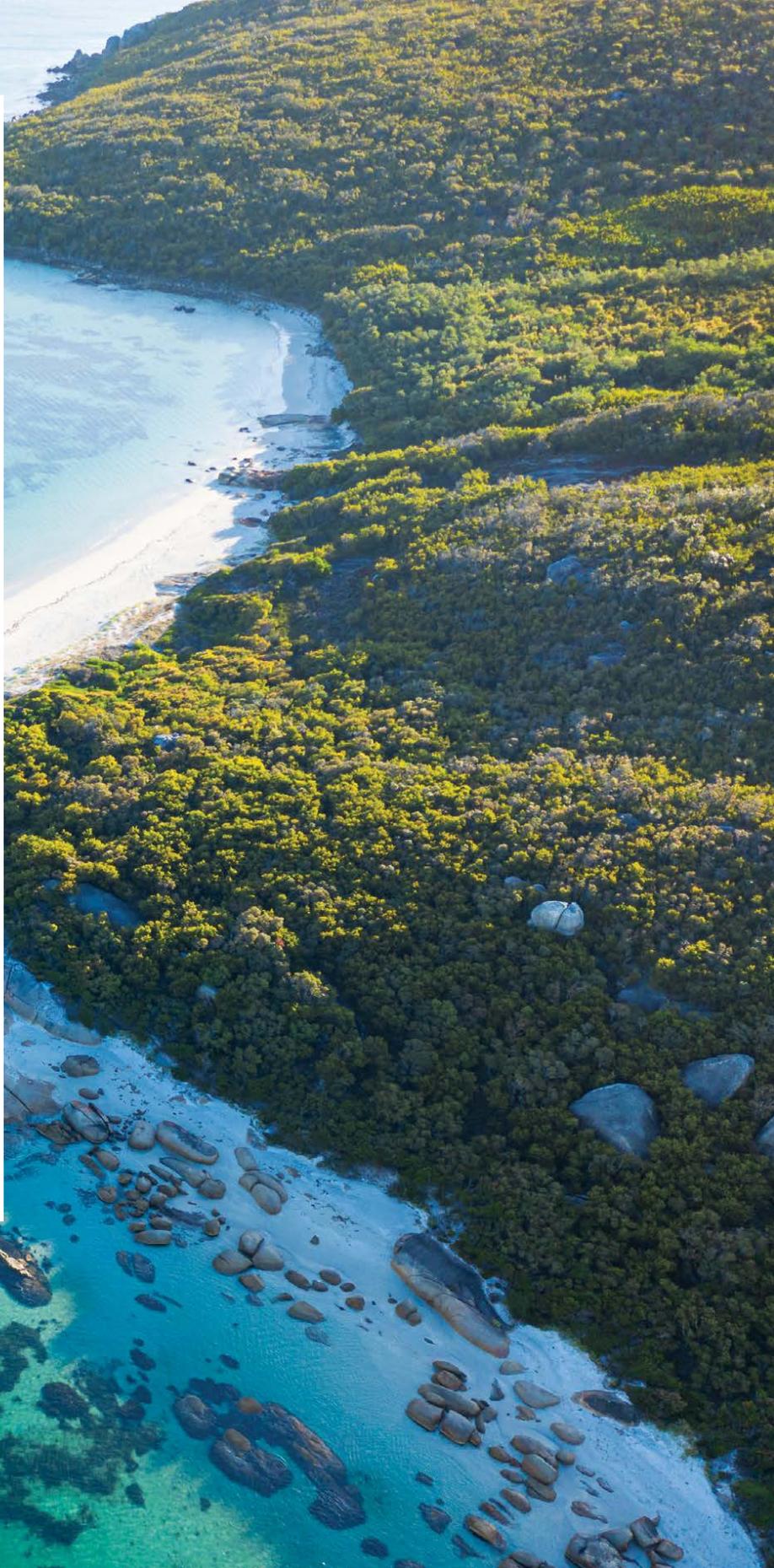
This statement was prepared and reviewed by members of the executive management team of TMBL, including the Chief Legal Officer. Consultation in the preparation and review of this statement with TMBL's owned and controlled entity, EdSec, has occurred through their common management and reporting channels, as well as engagement with the Trustee (Perpetual Corporate Trust Limited).

This joint Modern Slavery Statement was approved by TMBL's Board of Directors in its capacity as the principal governing body of the higher entity on 27 October 2025.



Andrew Kearnan
Chair of the Board of Directors

27 October 2025



Acknowledgement of Country

Teachers Mutual Bank Limited acknowledges the Traditional Custodians of Country throughout Australia and their continuing connection to land, water and communities. We pay our respects to Aboriginal and Torres Strait Islander cultures, their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

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Message from the Chair

At Teachers Mutual Bank Limited, we are a bank for Australians working in the education, health and services industries. Our responsibility to respect human rights is embedded within our purpose – banking for good.

We strive to conduct our business responsibly and sustainably, and we aim to collaborate with like-minded organisations to drive positive change.

We are committed to respecting all human rights, as outlined in the Universal Declaration of Human Rights. We acknowledge our bank's role to support our people and partners in the global efforts to end modern slavery.

This Modern Slavery Statement is an opportunity to share our progress to date and outlines the steps we are taking to assess and address the risks of modern slavery in our operations and supply chain. It also affirms our commitment to continue lifting standards in the years ahead.



Andrew Kearnan
Chair of the Board of Directors



Andrew Kearnan, Chair

Our structure, operations and supply chain

Structure and operations

We are Teachers Mutual Bank Limited, one of Australia's largest member-owned banks, helping almost 220,000 Australians working in the education, health, and emergency services industries.

Almost 60 years ago, our bank was created by a group of volunteers as a positive alternative to the major banks. Their innovation, tenacity, and spirit provided the opportunity for members to achieve home ownership and their financial goals. Six decades later, this hasn't changed.

Today, we have more than 600 employees who are committed to delivering exceptional services, competitive rates, and supporting the industries that support us through our four retail brands - Teachers Mutual Bank, UniBank, Firefighters Mutual Bank, and Health Professionals Bank.

As a mutual bank, we are 100% owned by our members, meaning instead of profits being distributed to shareholders and investors through dividends, our profits are reinvested to benefit our members and their communities.

We are an authorised deposit-taking institution regulated under the *Banking Act 1959* (Cth) and by Government agencies such as the Australian Prudential Regulation Authority (APRA), Australian Securities and Investments Commission (ASIC), and Australian Transaction Reports and Analysis Centre (AUSTRAC).

We are proudly a Certified B Corporation and are just one of only 57 banks globally to have obtained this certification. Certified B Corporations meet high standards of verified social and environmental performance, public transparency, and legal accountability to balance profit and purpose.

During the reporting period, TMBL owned and controlled two subsidiary entities:

- Tertiary Travel Service Pty Ltd; and
- EdSec Funding Trust No. 1.

Tertiary Travel Service Pty Ltd is in the process of being wound up, and was not operating during the reporting period.

EdSec Funding Trust No 1 (**EdSec**) is a corporate unit trust and wholly owned and controlled by TMBL as a securitisation vehicle to access emergency liquid funds from the Reserve Bank of Australia in the event these are required. EdSec was a reporting entity for the reporting period and this joint report covers EdSec. It has no dedicated staff or suppliers and does not own or control any other entities. The day-to-day management of EdSec is undertaken by TMBL's Treasury and Finance teams, and Perpetual Corporate Trust Limited as Trustee, under the oversight of the Chief Financial Officer.

More information about our business is set out in our [2024-2025 Annual Report](#).

Our products

We provide personal retail banking services and do not have any operations in foreign jurisdictions. The main products offered are deposit products (such as savings accounts and transaction accounts), non-cash payment products (such as cards) and loan products (such as home loans, personal loans and credit cards). We also offer telegraphic transfer and foreign exchange services to members, general insurance products as agent for Allianz Australia Insurance Limited (such as home and contents, car and caravan and landlord insurance), and life insurance products as agent for Zurich Australia Limited.

Our supply chain

We procure goods and services from a diverse supply chain. During this reporting period, Teachers Mutual Bank Limited procured goods and services from 578 suppliers. These suppliers range from very large established entities that are key partners in our business operations, to entities that provide low value or infrequent products and services. Our supply chain includes 28 suppliers that are domiciled offshore, the majority of which are in the United States of America. In total, 95% of Teachers Mutual Bank Limited’s supplier spend during this reporting period was with 25% of our suppliers. Of those key suppliers, 94% are based in Australia. The bank recognises that each of these suppliers has their own supply chain. We also recognise the opportunity our supply chain provides to create positive impact through diverse sourcing strategies and practices.

Supplier spend is managed in the following categories:

Member Engagement



Marketing, services supporting our products, digital channels and contact centre.

Corporate Services



Office services, logistics, supporting our property footprint, security, travel and entertainment, tools and office supplies, training, recruitment, contingent workforce services and professional services.

Technology



IT, payment processing, telecommunications, computer hardware and software, mobile, telephone and data services.

Contractor management

Teachers Mutual Bank Limited uses a range of measures for contractor management, including but not limited to an online contractor management, prequalification, and compliance solution. These measures pre-qualify contractors, perform checks including reputation, workplace, health and safety (**WHS**) assessments, licences and insurances; and provide site orientation, induction and training. A record of these activities is then produced.

Risks and due diligence in our lending operations

Through our Treasury Credit Risk Management Policy and Lending Credit Risk Framework we have embedded sustainable considerations. We do not directly lend to corporations that operate in specific sectors such as tobacco, gambling, pornography and fossil fuels.

Tackling financial crime

Modern slavery practices are crimes, and the perpetrators are likely to seek to launder the proceeds through the financial system to legitimise them. We leverage intelligence, analytics, investigations and partnerships with other financial institutions and regulators to identify, mitigate and deter financial crime. During the reporting period, we have further uplifted our controls and processes including Know Your Customer (KYC) refresh, Enhanced Customer Due Diligence (ECDD) and Customer Risk Assessment (CRA) to enable Teachers Mutual Bank Limited to understand whether there are any customers associated with high modern slavery risks.

We are aware that child sexual exploitation (**CSE**) is among the worst forms of modern slavery and that those experiencing CSE and perpetrators can be from any jurisdiction, including Australia. Payment for this activity takes a variety of forms. During this reporting period, we have continued our engagement with partner agencies to understand current typologies, as they evolve, to enable Teachers Mutual Bank Limited to better profile and detect payments that may relate to CSE, and have client transaction monitoring and de-banking practices targeted specifically at detecting and deterring this behaviour. We adhere strictly to our reporting obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Amendment Act 2024* (Cth) to enable law enforcement to take any action deemed necessary.



Identifying our modern slavery risks

Teachers Mutual Bank Limited is committed to respecting all human rights as outlined in the Universal Declaration of Human Rights and supported by the United Nations Guiding Principles on Business and Human Rights, which notes 'the corporate responsibility to respect human rights' and that business may cause, contribute or be directly involved with adverse human rights impacts as a result of business relationships in its value chain.

Our modern slavery risks

Modern slavery includes slavery, servitude, forced labour, forced marriage, child labour, debt bondage, deceptive recruiting for labour or services and human trafficking.

We acknowledge the risks of modern slavery across our operations and supply chain, including the following:

Employer

Exploited labour within indirect employment arrangements.

Investor

Investment in entities with links to modern slavery.

Members

Members may transact across geographies or facilitate investment in sectors that have links to modern slavery, or transact through entities that use financial services to launder money derived from modern slavery. We may also have members who are vulnerable persons subject to exploitation or exposure to modern slavery risk through personal or work circumstances.

Partner and Sponsor

Partnership, support, donation or advocacy relationships with organisations involved in modern slavery.

Purchasing

Purchasing goods or services which have modern slavery in their creation or provision. This could be impacted by sourcing practices, engaging in one-off purchases and/or the use of non-contracted suppliers. These risks may be higher where goods and services are manufactured in countries and/or use raw materials from industries at higher risks of modern slavery.

Raising awareness and training

Teachers Mutual Bank Limited educates our people to identify, mitigate, manage and report on modern slavery risks.

As part of our work to build internal awareness and capability, our modern slavery online training module is mandatory for all staff. This training provides an overview of our obligations under the Australian *Modern Slavery Act 2018* (Cth), as well as education as to the various forms of modern slavery, the cost and impact on individuals, businesses and the wider community, business activities and industries where modern slavery practices are prevalent and practical examples of addressing modern slavery risks.

Looking forward, Teachers Mutual Bank Limited is committed to reviewing and developing this training offering, to ensure it remains effective and appropriate to ensure that staff understand TMBL's policies, indicators that a customer/supplier is experiencing modern slavery and what staff can do if they suspect modern slavery.



Our actions to address modern slavery risks

We are continuing to assess our operations, supply chain and investment portfolio to improve our understanding of modern slavery risk, and mitigate those risks where possible.

During this reporting period, our key actions to address modern slavery risk included:

- Use of our governance, risk and compliance (GRC) system, Archer, to maintain supplier contracts and manage ongoing obligations, including the recording of Modern Slavery Assessment outcomes for third-party supplier engagements.
- Strengthening our vendor governance processes through more clearly defined Executive accountability and dedicated Relationship Managers for each of our third-party suppliers, to enhance oversight of supplier practices and support greater accountability across the business.
- Commencing an active partnership with Purpose Bureau, an independent ESG data and risk intelligence provider, who support us in conducting a focused risk assessment of certain suppliers engaged by Teachers Mutual Bank Limited.

Purpose Bureau partnership

As outlined in our previous Modern Slavery Statement, Teachers Mutual Bank Limited is committed to embedding data intelligence and tools into our supplier due diligence process, to reduce overreliance on administrative requests (such as ESG questionnaires) and deepen our insights into supply chain risk.

During this reporting period, we initiated our engagement with Purpose Bureau, an independent ESG data and risk intelligence provider, to deliver this capability. Purpose Bureau supplies real-time, independent, data-driven analysis of ESG profiles and risks across global supply chains, enabling organisations to monitor risk events and elevate suppliers to best-in-class standards. Purpose Bureau's platform integrates with TMBL's own systems and dashboards, allowing access to supplier ESG, labour, human rights, and modern slavery risk metrics.

Through this engagement, Purpose Bureau assessments provide TMBL with a foundation of data intelligence to identify and prioritise areas of potential risk across our supplier base. Purpose Bureau reports are refreshed on a regular basis, ensuring that our monitoring remains current and responsive to emerging risks. These reports are also embedded into our vendor onboarding processes as a due diligence control to help identify potential red flags before new suppliers are engaged. This allows us to better understand exposures to modern slavery, labour and human rights vulnerabilities, and ESG performance attributes - without relying purely on supplier self-reporting.





Supplier assessment

During this reporting period, we applied Purpose Bureau insights in a test-and-learn pilot with 316 of the 578 suppliers engaged by Teachers Mutual Bank Limited, with a specific focus on modern slavery and broader human rights risk indicators. The remaining 262 suppliers were deemed out of scope for this assessment due to their entity type, including spend associated with Commonwealth or state Governments, trusts, and partnerships.

Of the assessed suppliers, 27 were identified as having potential ethical risk exposures across one or more of the following categories:

- Business sanctions and exclusions (Government sanctions, exclusion lists, trade penalties); and/or
- Workplace incidents (underpayment cases, discrimination cases, WHS penalties).

There were no actual or suspected instances of modern slavery identified during this reporting period.

Purpose Bureau supplier assessment outcomes were reviewed by key internal stakeholders, including representatives from the Procurement, Compliance, and Risk functions. Following a comprehensive evaluation of the identified suppliers, it was determined that five of the 27 identified suppliers would no longer be engaged due to potential ethical risk exposures, and they were subsequently deactivated from Teachers Mutual Bank Limited's payment systems.

Looking forward

Our test-and-learn pilot with Purpose Bureau is already supporting Teachers Mutual Bank Limited to refine our supplier engagement strategy, determine which communication and remediation levers are effective, and develop a best practice ladder for risk response.

Purpose Bureau next steps

By way of next steps, we are currently developing our approach to engaging with the 22 other identified suppliers (the remainder of the initial supplier cohort identified by Purpose Bureau as having potential ethical risk exposures), as a critical part of our ongoing supplier management and risk mitigation strategy. The key principles are to better understand the context of the identified issues, seek remediation where appropriate, and determine whether continued engagement is appropriate. Consistent with the United Nations Guiding Principles on Business and Human Rights, our intent is to use our leverage to improve outcomes wherever practicable.

It is anticipated that this approach will:

- Enhance suppliers' awareness of ways to identify and prevent modern slavery in their operations;
- Improve supplier practices through collaboration e.g. fair recruitment and grievance mechanisms;
- Ensure contract terms are fair, so that payment terms and purchasing practices do not indirectly foster exploitative labour; and
- Recognise that as many suppliers service multiple institutions, improvements required by Teachers Mutual Bank Limited may be embedded into suppliers' standard procedures - lifting standards for other customers of those suppliers without formal industry advocacy or coordination.

Through its ongoing partnership with Purpose Bureau, TMBL will strengthen its capacity to detect risks, engage meaningfully with suppliers, and scale its modern slavery response.

Our commitment to strengthen and uplift

Teachers Mutual Bank Limited is committed to continuing to strengthen and uplift its approach to modern slavery. Looking forward, we aim to take steps including the following:

- Undertaking a staged approach to broader targeted supplier engagement beyond the scope of Purpose Bureau assessments;
- Conducting a risk assessment of all engaged suppliers in our supplier base;
- Regularly reviewing our Supplier Code of Conduct with a view to continuous improvement;
- Reviewing and developing our modern slavery mandatory staff training module, to ensure it remains effective and appropriate;
- Elevating our Whistleblower Policy to enhance its modern slavery provisions; and
- Enhancing our oversight of key supplier's governance and extended supply chains, including third-party and fourth-party practices.

Grievance mechanisms and remediation

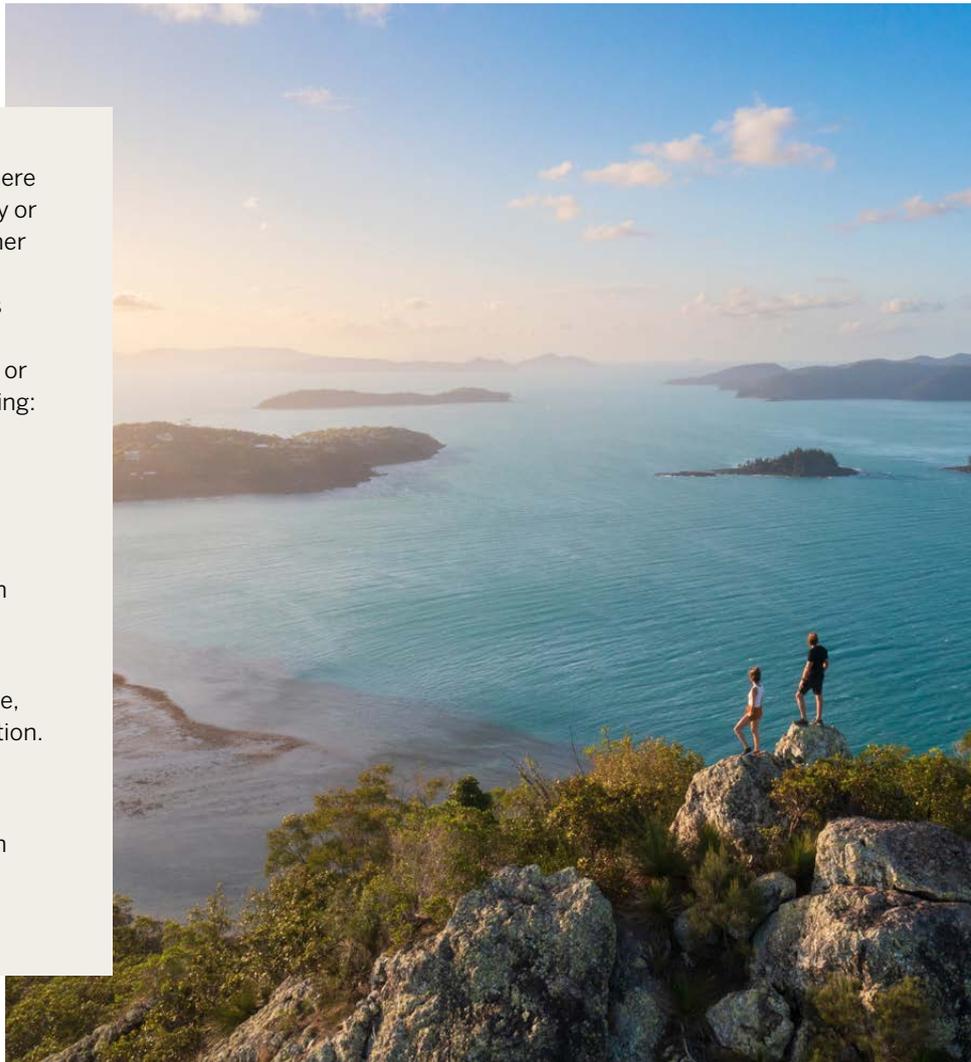
Teachers Mutual Bank Limited aims to identify, prevent, mitigate and account for our adverse human rights impacts. We are committed to providing for or cooperating in remediation when appropriate, and provide mechanisms through which grievances can be raised.

Concerns about suspected or occurring modern slavery practices, breaches of labour law, human rights or non-compliance with Teachers Mutual Bank Limited policies can be raised through our complaints and dispute resolution process or our Whistleblower Policy.

Where there is evidence of a failure to adhere to standards in preventing modern slavery or human trafficking, we look to engage, rather than divest. The United Nations Guiding Principles on Business and Human Rights recognise different remedies that may be appropriate if an organisation has caused or contributed to human rights harm, including:

- Apologies;
- Restitution;
- Rehabilitation;
- Financial or non-financial compensation and punitive sanctions (criminal or administrative, such as fines); or
- Prevention of harm through, for example, injunctions or guarantees of non-repetition.

In relevant circumstances, a remediation plan will be developed with suppliers or investments should an incident of modern slavery be identified for ongoing tracking, management and reporting.



Policies and frameworks

Conducting business ethically and responsibly is fundamental to how Teachers Mutual Bank Limited operates. Our behaviour is underpinned by our values and commitment to ethical business. Policies and processes which outline our expectations include:

Policy/Process Document	Purpose
AML - CTF Program	Sets out how we comply with anti-money laundering and counter-terrorism financing (AML/CTF) legislative obligations.
Code of Conduct (Employee) Director Code of Conduct	Outlines our commitment to treat others with respect, dignity and fairness, and ensuring a safe and healthy work environment for all employees, contractors, visitors, members and customers. Sets clear expectations for ethical leadership and legal compliance, supporting appropriate due-diligence and controls. It fosters a speak-up culture and accountability so concerns are escalated early and addressed.
Complaints and Dispute Resolution Policy	Outlines our approach to complaints handling. We are committed to working with complainants to understand their issue and providing an appropriate outcome.
Customer Owned Banking Code of Practice	Sets standards of good practice for customer owned banks.
Human Resources Policy	Governs employment and personnel matters, including our commitment to ensuring appropriate remuneration and benefits for employees and contractors, and providing a workplace free of discrimination and harassment.
Vendor Risk Management Policy	Outlines how risks associated with engaging vendors for different products and services are managed.
Vendor Life Cycle Standard	Provides guidance on how to achieve compliance with the Vendor Risk Management Policy
Supplier Code of Conduct	Outlines our expectations of suppliers of goods and services, including their employees, agents, subcontractors, and affiliates.
Vulnerable Persons Policy	Outlines our approach to supporting vulnerable persons.
Whistleblower Policy	Outlines our approach to the reporting of unethical, corrupt, illegal or undesirable conduct and to ensure that those who do report can do so safely, securely and with confidence that they will be protected and supported consistent with our policies and legal obligations.



Our values



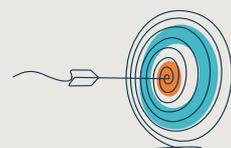
Passion



Excellence



Growth



Sustainability

Governance

Teachers Mutual Bank Limited’s Board of Directors has ultimate oversight over actions taken to address the risk of modern slavery practices within our business and with our suppliers.

The Board sets the ‘tone from the top’ and fosters an appropriate culture consistent with Teachers Mutual Bank Limited’s values. The Board Risk and Compliance Committee, a subcommittee of the Board, oversees the preparation of the Modern Slavery Statement and makes recommendations in relation to that statement to the Board. Senior leaders are responsible for leading day-to-day actions which relate to modern slavery, such as engaging with new suppliers, embedding practices within our operations and ensuring adherence to policies and procedures.

Risk and compliance

Teachers Mutual Bank actively manages risk in accordance with our Risk Appetite Statement, Risk Management Framework and Risk Culture Framework, and is committed to a positive risk culture built around four pillars of key risk behaviours and outcomes:

- Pillar 1: Leadership and Accountability
- Pillar 2: Decision-Making and Challenge
- Pillar 3: Communication and Transparency
- Pillar 4: Risk Capabilities and Improvement

We ensure that accountabilities and responsibilities for compliance obligations and the associated risks are defined in line with the Three Lines of Defence (**3LOD**) as summarised in the table below:



Summary	1 st LOD	2 nd LOD	3 rd LOD
Role	<ul style="list-style-type: none"> • All employees • Business Unit Owners • Project Managers 	<ul style="list-style-type: none"> • Risk • Compliance • Controls Assurance 	<ul style="list-style-type: none"> • Internal audit
Responsibilities	<ul style="list-style-type: none"> • Own their obligations, risks, issues, incidents 	<ul style="list-style-type: none"> • Perform review and challenge 	<ul style="list-style-type: none"> • Perform independent assurance

Risk Management Framework

Our Risk Management Framework illustrates the structure within which the bank identifies, measures, evaluates, monitors and reports risk:



Risk Management Framework (RMF) key components

The RMF enables Teachers Mutual Bank Limited to appropriately develop and implement strategies, policies, procedures and controls to manage different types of Material Risks.



-  **TMBL's Bank Strategy** sets out its approach for the implementation of its strategic objectives (business plan) and informs its Material Risks.

-  **The Risk Management Strategy (RMS)** establishes the approach to iteratively identifying, assessing and managing Material Risks within Board-approved risk appetite settings.

-  **The Risk Appetite Statement (RAS)** articulates which risks we will assume and which we will not in pursuit of our business aims, setting a boundary for risk taking.

-  **The 3LOD model** is used to define risk management roles. This 3LOD model facilitates the effective operation of the Risk Management Framework by our people.

-  **Risk culture** is defined as the beliefs, values and behaviours within TMBL that determine how risks are identified, measured, governed, and acted upon.

-  **TMBL's Risk Governance** approach details the relationship between the Board, Board Committees and senior management with respect to risk management.

Assessing the effectiveness of our actions

We are committed to continually improving our approach to modern slavery and advancing human rights. We acknowledge that measures of effectiveness are critical to assist in informing appropriate actions to address our risks.

Our principles

We identify appropriate action based on the following principles:

Prioritisation



We place a focus on where the greatest risks of modern slavery are identified in our operations, lending, supply chain and investments.

Leadership



We use our industry influence to share knowledge and drive greater advancement in managing modern slavery risks.

Collaboration



We work with like-minded organisations and stakeholders to continually learn about and reduce the risk and occurrence of modern slavery.

Assessing our actions

We review and assess the effectiveness of our modern slavery actions through qualitative and quantitative measures including:

- monitoring the number of modern slavery reports received;
- regular risk assessments undertaken by our Procurement and Vendor Management functions, in partnership with Purpose Bureau;
- regular review of Purpose Bureau supplier assessment outcomes by key internal stakeholders, including representatives from the Procurement, Compliance, and Risk functions, to ensure appropriate action is taken to address any issues raised;
- ensuring our mandatory staff modern slavery training offering remains effective and appropriate;
- reporting on modern slavery matters to the Board Risk and Compliance Committee;
- engaging with suppliers to ensure compliance with our Supplier Code of Conduct;
- monitoring mandatory staff modern slavery training completion rates, and escalating in the case of non-compliance;
- regular review and updates to our procurement policies and Supplier Code of Conduct; and
- regular review of modern slavery trends and cases in the financial services sector.

We remain committed to continuous learning and innovating our approach to proactively mitigate and address the risks of modern slavery in our supply chain.



APPENDIX 1

Overview of consultation with reporting entities and entities owned and controlled by TMBL

During the reporting period and in preparing this joint Statement, Teachers Mutual Bank Limited consulted with EdSec through engagement with the Trustee (Perpetual Corporate Trust Limited) and Teachers Mutual Bank Limited's Treasury and Finance teams, who manage the Trust on a day-to-day basis under the Chief Financial Officer's oversight. Given the Trust's narrow purpose as a securitisation vehicle to access RBA liquidity in a crisis, and its lack of dedicated staff or suppliers, the risk of modern slavery is considered low.

Consultation with Tertiary Travel Service Pty Ltd was not required, as it was not operational during the reporting period.

APPENDIX 2

Australian Modern Slavery Act Mandatory Criteria

This Statement was prepared to meet the mandatory reporting criteria set out in the Australian *Modern Slavery Act 2018* (Cth). The table below identifies where each criterion is addressed within this statement:

Mandatory criteria	Reference in this statement
Identify the reporting entity.	<ul style="list-style-type: none"> About this statement – page 2
Describe its structure, operations and supply chains.	<ul style="list-style-type: none"> Our structure, operations and supply chain - page 5-6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	<ul style="list-style-type: none"> Identifying our modern slavery risks - page 8
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.	<ul style="list-style-type: none"> Our actions to address modern slavery risks - page 10 Looking forward - page 12 Grievance mechanisms and remediation - page 13
Describe how the reporting entity assesses the effectiveness of these actions being taken to assess and address modern slavery risks.	<ul style="list-style-type: none"> Assessing the effectiveness of our actions - page 18
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	<ul style="list-style-type: none"> Appendix 1 - Overview of consultation with reporting entities and entities owned and controlled by TMBL - page 20
Any other relevant information.	<ul style="list-style-type: none"> About this statement - page 2 Message from the Chair - page 4

**TEACHERS MUTUAL
BANK LIMITED**

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