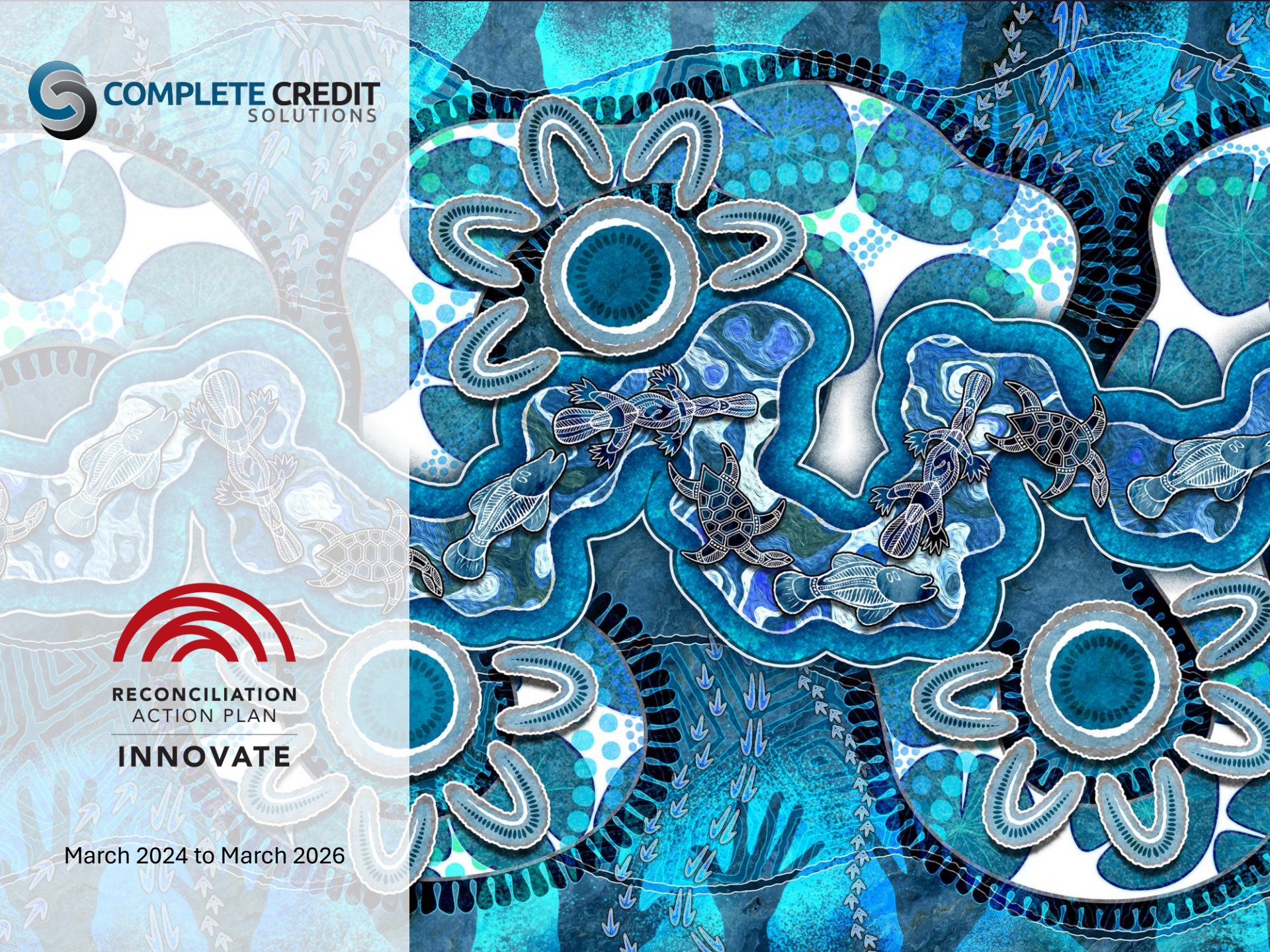




RECONCILIATION
ACTION PLAN

INNOVATE

March 2024 to March 2026





Complete Credit Solutions acknowledges Aboriginal and Torres Strait Islander Peoples as the First Peoples of Australia.

We would like to acknowledge and pay respect to the Traditional Owners of the Land on which we meet, live, work and learn.

- Our PARRAMATTA office acknowledges the DHARUG people.
- Our HURSTVILLE office acknowledges the BIDJIGAL people.
- Our GOSFORD office acknowledges the DARKINJUNG people.

We pay respect to the Elders of each Nation – Past, Present and Future – and promote the continuation of the cultural, spiritual, and educational practices of Aboriginal and Torres Strait Islander Peoples. Ancestors have walked this Country and we acknowledge their special and unique place in our nation’s historical, cultural, and linguistic identity.

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A Message from our Managing Directors

At Complete Credit Solutions (CCS), our purpose is to provide better financial outcomes to our customers, through flexible payment solutions. We are passionate about helping our customers get back on track with meeting their financial obligations and progressing to financial recovery.

Over the last financial year, CCS has made progress in developing a better understanding and increasing our cultural awareness of Aboriginal and Torres Strait Islander peoples and their wide-ranging cultures, beliefs, kinship systems, and spiritual connection to the environment.

CCS had embarked on this journey with our inaugural Reflect Reconciliation Action Plan (RAP), a framework that has assisted CCS in leveraging our current practices and diverse spheres of influence to support the national reconciliation movement for the better. We have implemented all 37 initiative activities committed last financial year which is a great achievement!

We are proud to introduce the next step in our journey, which is our Innovate RAP, delving even deeper into the core pillars of Relationships, Respect, Opportunities and Governance. Whilst we will be building on some of the past initiative activities such as celebrating Aboriginal and Torres Strait Islander histories and cultures, there is space for our company to take new opportunities for stakeholder engagement with Aboriginal and Torres Strait Islander groups.

We want to focus on improving employees' understanding of Aboriginal and Torres Strait Islander peoples' financial wellbeing and supporting education opportunities through SEDA Scholarships which will have a direct and positive impact on the lives, opportunities, and outcomes for Aboriginal and Torres Strait Islander peoples, in the hopes that it will help with preventing or breaking the debt cycle that they may be in.

We recognise that reconciliation is an ever-expanding journey that requires constant renewal and prioritisation, and we will strive for reconciliation to be in the hearts, minds and actions of all of us at CCS – no matter our background or role. We would like to thank all of our CCS team members and external stakeholders who have contributed to accomplishing our Reflect RAP initiatives thus far, and to acknowledge those who will be involved in our continued journey for reconciliation in the next two years.



Jack Toutounji
Managing Director, CCS



Michael Brahim
Managing Director, CCS



A Message from Reconciliation Australia

Reconciliation Australia commends Complete Credit Solutions on the formal endorsement of its inaugural Innovate Reconciliation Action Plan (RAP).

Commencing an Innovate RAP is a crucial and rewarding period in an organisation's reconciliation journey. It is a time to build strong foundations and relationships, ensuring sustainable, thoughtful, and impactful RAP outcomes into the future.

Since 2006, RAPs have provided a framework for organisations to leverage their structures and diverse spheres of influence to support the national reconciliation movement.

This Innovate RAP is both an opportunity and an invitation for Complete Credit Solutions to expand its understanding of its core strengths and deepen its relationship with its community, staff, and stakeholders.

By investigating and understanding the integral role it plays across its sphere of influence, Complete Credit Solutions will create dynamic reconciliation outcomes, supported by and aligned with its business objectives.

An Innovate RAP is the time to strengthen and develop the connections that form the lifeblood of all RAP commitments. The RAP program's framework of *relationships*, *respect*, and *opportunities* emphasises not only the importance of fostering consultation and collaboration with Aboriginal and Torres Strait

Islander peoples and communities, but also empowering and enabling staff to contribute to this process, as well.

With close to 3 million people now either working or studying in an organisation with a RAP, the program's potential for impact is greater than ever. Complete Credit Solutions is part of a strong network of more than 2,500 corporate, government, and not-for-profit organisations that have taken goodwill and intention, and transformed it into action.

Implementing an Innovate RAP signals Complete Credit Solution's readiness to develop and strengthen relationships, engage staff and stakeholders in reconciliation, and pilot innovative strategies to ensure effective outcomes.

Getting these steps right will ensure the sustainability of future RAPs and reconciliation initiatives, and provide meaningful impact toward Australia's reconciliation journey.

Congratulations Complete Credit Solutions on your Innovate RAP and I look forward to following your ongoing reconciliation journey.



Karen Mundine
Chief Executive Officer,
Reconciliation Australia





Our Vision For Reconciliation

Our vision for reconciliation is an Australia that is aware of the cultures and histories of Aboriginal and Torres Strait Islander peoples, where they experience equal access and opportunities as customers of financial solutions.

In the context of our organisation, this represents increasing our employees' understanding and acceptance of Aboriginal and Torres Strait Islander peoples' cultures and histories. This will enable an inclusive workplace where everyone is aware of how to have considerate and respectful conversations with our Aboriginal and Torres Strait Islander customers when we are exploring options for their financial rehabilitation.

Who We Are

Our Business

CCS are an Australian owned and operated business that prides itself on the rehabilitation of customers in debt. CCS has established themselves in the debt collection industry as a player that manages consumer debt differently: with a sustainable and customer focused approach. Building these relationships with customers and other stakeholders has helped the company successfully grow, with plans to continue this growth whilst ensuring quality and strong customer outcomes are not compromised.

CCS' portfolios typically consist of consumers who may be experiencing financial difficulty or in some cases have legitimate reasons for not paying their debts. We are committed to assisting all of our customers by working with them, so that over time, they can meet their obligations while also progressing to financial recovery. CCS's operations typically involves the acquisition and recovery of debt ledgers, and the business operates in NSW across three locations, i.e. Parramatta, Hurstville and Gosford.

While the number of Aboriginal and Torres Strait Islander staff within the organisation is not definitively known, we have 3 persons who have voluntarily identified as Aboriginal and Torres Strait Islander peoples, both within the executive leadership team and within our wider staff base. This is out of a total of 144 Australian based staff.

Our Mission

To provide better financial outcomes to our customers, through flexible payment solutions.

Our Vision

Be the most trusted and recognised partner to our clients, customers and stakeholders.

Our Values

- **Collaboration:** We work together to achieve the best results for our company, our customers and our clients.
- **Customer Focus:** We prioritise delivering sustainable and meaningful change to our customers' financial situation and providing a good customer experience.
- **Accountability:** We are proud of how we conduct ourselves, the decisions we make and our commitment to ensure our actions match our words.
- **Excellence:** We hold ourselves to the highest standards in everything we do to achieve excellent outcomes.
- **Continuous Improvement:** We are open-minded and continuously pursue new ideas, methods, products, processes, and procedures that drive positive change and improvement within our company.

Our Reconciliation Journey

CCS's focus has been on developing our employees' understanding and cultural awareness of Aboriginal and Torres Strait Islander peoples through CCS' commitment of its inaugural Reflect Reconciliation Action Plan (RAP). This involved the implementation and achievement of 37 initiative activities with the following highlights:

June 2022 – Reflect RAP commenced and CCS formed RAP Working Group

To kick off our Reflect RAP, CCS formed our RAP Working Group of individuals across the business to support CCS's reconciliation journey. CCS commissioned an Aboriginal and Torres Strait Islander artwork by Nathan Peckham, the owner of Yurana Creative, who leans upon the teachings of his Elders, the Tubbah-gah clan within the Wiradjuri nation of NSW. The artwork has a dual meaning, depicting the three 'tribes', the CCS offices, travelling along a river, using their knowledge of the habits of land and water animals to search for the best plentiful waterhole. This metaphorically shows CCS's journey towards reconciliation, and similarly CCS will need to develop an understanding of Aboriginal and Torres Strait Islander communities within our specific sphere (understanding traditional owners, community groups, and relevant governance structures). The artwork and its meaning are placed around CCS offices to help employees start the conversation on our reconciliation journey.

June 2022 to June 2023 – Exploring Opportunities and Engaging with Supply Nation Verified Vendors

Throughout CCS's Reflect RAP period the business continued to explore opportunities of different Supply Nation verified vendors that we could support, partner with and foster long term relationships. CCS aimed to use these Supply Nation verified vendors for any events or regular business requirements for the whole year. We were able to successfully engage Supply Nation verified vendors who provided: Electricity Broker services, Stationery orders, and Catering services.

September 2022 to December 2022 - Rolled out Policies and Training on Reconciliation

CCS rolled out new internal Policies to our staff related to: Equal Employment, Anti-Discrimination, Diversity Equity & Inclusion (DEI), to promote positive race relations through relevant strategies. These are complemented via our Diversity, Equity & Inclusion Training Module, and the Aboriginal and Torres Strait Islander Course (SBS Inclusion Module). CCS have purchased the SBS Inclusion Module to ensure accurate information on Aboriginal and Torres Strait Islander persons, cultures, histories and experiences, to raise awareness to our staff around reconciliation and how we can act to be more considerate to our Aboriginal and Torres Strait Islander customers and persons within the community.

Our Reconciliation Journey (continued)

March 2023 - Partnered with Community Involvement Solutions (CIS)

CCS partnered with Community Involvement Solutions (CIS) which sponsors CIS' online literacy and numeracy program for Aboriginal and Torres Strait Islander peoples. This provided CCS an opportunity to assist CIS with their program goals, i.e., to promote and facilitate developmental and life opportunities and outcomes for Aboriginal and Torres Strait Islander peoples and communities in Australia. In total, CCS sponsored 4 Aboriginal and Torres Strait Islander learners in partnership with Community Involvement Solutions (CIS) to assist with increasing their literacy and numeracy skills and improve their opportunities for securing jobs.

June 2023 - Celebrated National Reconciliation Week (NRW)

CCS hosted a screening event and luncheon in conjunction with National Reconciliation Week. The screening event was based on a documentary by an Aboriginal and Torres Strait Islander filmmaker, helping our employees to learn more about Australian history and the Aboriginal and Torres Strait Islander story. RAP Working Group members provided staff with information of NRW events held across the state that they could take part in and discussed the documentary to explore how each one of us can contribute to a more equitable and reconciled country for all.

July 2023 – Celebrated NAIDOC Week

CCS celebrated NAIDOC week with some delicious lunch and an Aboriginal and Torres Strait Islander artwork competition where employees took turns explaining their artwork, the colour choices and what it represents or means to them. Our lunch comprised of native ingredients and 'bush tucker' produce. The caterers, stationery and prizes for the artwork competition were all from Supply Nation verified vendors to show our support.



Our Innovate Reconciliation Action Plan

This Innovate RAP is our second step in the CCS reconciliation journey and we look forward to building on the learnings and perspectives gained through our Reflect RAP, and to develop and build new relationships with Aboriginal and Torres Strait Islander stakeholders while we continue to work towards reconciliation and achievement of objectives such as:

- Supporting improvement in Aboriginal and Torres Strait Islander educational and employment opportunities, through fundraising initiatives for SEDA Scholarships.
- Educating our employees and ensuring they are appropriately equipped to have respectful conversations with our Aboriginal and Torres Strait Islander customers around financial wellbeing and work towards positive outcomes.
- Understanding more about the Traditional Owners of the lands on which we operate and create a deeper understanding and knowledge of Aboriginal and Torres Strait Islander cultures.

Our RAP Champion is Craig Worsley (Chief Operating Officer) who will ensure employees are informed and engaged on this important journey and our RAP Sponsor is Jack Toutounji (Managing Director) who will ensure the successful implementation and delivery of the RAP. The RAP Working Group is made up of a selection of CCS staff from various divisions and offices, including the following personnel:

- Managing Director
- Chief Operating Officer (COO)
- Head of Governance, Risk and Compliance (GRC)
- Head of Finance
- Head of Human Resources (HR)
- Human Resource Officer
- Audit and Assurance Manager (A&A Manager)
- Product Owner
- Systems Administrator
- Customer Relationship Specialists (CRSs)

To ensure Aboriginal and Torres Strait Islander representation, 2 members of the Working Group identify as Aboriginal and Torres Strait Islander and are able to share their experiences and insights on matters.

The RAP Working Group will continue their ongoing role to:

- Lead and oversee the development and implementation of our Innovate RAP and its actions within the targeted timeframes.
- Report on the status of RAP actions to the RAP Champion, RAP Sponsor and the Executive Leadership Team.
- Work with internal and external stakeholders to deliver on successful RAP outcomes.



Relationships

We are a business built on relationships – the work we are committed to is around being able to collaborate and discuss experiences which helps to strengthen mutual understanding. It is important for us to develop and maintain strong relationships both with Aboriginal and Torres Strait Islander stakeholders so that they can share their cultural perspectives, and with our own employees to ensure their connection with our reconciliation journey.

Action	Deliverable	Timeline	Responsibility
Establish and maintain mutually beneficial relationships with Aboriginal and Torres Strait Islander stakeholders and organisations.	Meet with local Aboriginal and Torres Strait Islander stakeholders and organisations to develop guiding principles for future engagement.	Jun 2024	Head of HR
	Develop and implement an engagement plan to work with Aboriginal and Torres Strait Islander stakeholders and organisations.	Dec 2024	Head of GRC
Build relationships through celebrating National Reconciliation Week (NRW).	Circulate Reconciliation Australia's NRW resources and reconciliation materials to our staff.	May 2024, 2025	A&A Manager
	RAP Working Group members to participate in an external NRW event.	27 May - 3 Jun 2024, 2025	Head of GRC A&A Manager CRSs
	Encourage and support staff and senior leaders to participate in at least one external event to recognise and celebrate NRW.	27 May - 3 Jun 2024, 2025	RAP Champion
	Organise at least one NRW event each year.	27 May - 3 Jun 2024, 2025	Head of GRC
	Register all our NRW events on Reconciliation Australia's NRW website .	May 2024, 2025	A&A Manager



Relationships (continued)

Action	Deliverable	Timeline	Responsibility
Promote reconciliation through our sphere of influence.	Develop and implement a staff engagement strategy to raise awareness of reconciliation across our workforce.	Aug 2025	Head of HR
	Communicate our commitment to reconciliation publicly.	Mar 2024	RAP Sponsor RAP Champion
	Explore opportunities to positively influence our external stakeholders to drive reconciliation outcomes.	Mar 2025	Head of GRC
	Collaborate with RAP organisations and other like-minded organisations (such as SEDA Scholarships) to develop innovative approaches to advance reconciliation.	May 2025	Head of HR
Promote positive race relations through anti-discrimination strategies.	Conduct a review of HR policies and procedures to identify existing anti-discrimination provisions, and future needs.	Mar 2024, 2025	Head of HR
	Develop, implement, and communicate an anti-discrimination policy for our organisation.	Jun 2024, 2025	Head of HR
	Engage with Aboriginal and Torres Strait Islander staff and/or Aboriginal and Torres Strait Islander advisors to consult on our anti-discrimination policy.	Jun 2024, 2025	Head of GRC
	Educate senior leaders on the effects of racism.	Oct 2024	RAP Champion Head of HR

We want our business and our employees to focus on equal respect and understanding for all people. This will involve developing a better understanding of cultures, rights, and histories of Aboriginal and Torres Strait Islander peoples, so employees can acknowledge, appreciate and celebrate our shared diversity and backgrounds within our own organisation and of our customers.

Action	Deliverable	Timeline	Responsibility
Increase understanding, value and recognition of Aboriginal and Torres Strait Islander cultures, histories, knowledge and rights through cultural learning.	Conduct a review of cultural learning needs within our organisation.	Oct 2024	L&D Manager
	Consult and remunerate local Traditional Owners and/or Aboriginal and Torres Strait Islander advisors to inform our cultural learning strategy.	Feb 2025	L&D Manager
	Develop, implement, and communicate a cultural learning strategy document for our staff.	May 2025	L&D Manager
	Provide opportunities for RAP Working Group members, HR managers and other key leadership staff to participate in formal and structured cultural learning.	Jul 2025	RAP Champion



Respect (continued)

Action	Deliverable	Timeline	Responsibility
Demonstrate respect to Aboriginal and Torres Strait Islander peoples by observing cultural protocols.	Increase staff's understanding of the purpose and significance behind cultural protocols, including Acknowledgement of Country and Welcome to Country protocols.	May 2025	Product Owner
	Develop, implement and communicate a cultural protocol document, including protocols for Welcome to Country and Acknowledgement of Country.	Mar 2025	Product Owner
	Invite a local Traditional Owner or Custodian to provide a Welcome to Country or other appropriate cultural protocol at significant events each year.	May 2025	Head of GRC Product Owner
	Include an Acknowledgement of Country or other appropriate protocols at the commencement of important meetings.	May 2025	RAP Champion
Build respect for Aboriginal and Torres Strait Islander cultures and histories by celebrating NAIDOC Week.	RAP Working Group to participate in an external NAIDOC Week event.	7 Jul - 14 Jul 2024, 6 Jul - 13 Jul 2025	Head of GRC A&A Manager
	Review HR policies and procedures to remove barriers to staff participating in NAIDOC Week.	May 2024, 2025	Head of HR
	Promote and encourage participation in external NAIDOC events to all staff.	7 Jul - 14 Jul 2024, 6 Jul - 13 Jul 2025	RAP Sponsor RAP Champion

In our reconciliation journey, it is important for us to educate our employees and ensure they are appropriately equipped to have respectful conversations with our Aboriginal and Torres Strait Islander customers around financial wellbeing and work towards positive outcomes. Creating opportunities for our Aboriginal and Torres Strait Islander customers and the peoples in the wider community is aligned to our commitment of diversity, equity and inclusion. Aboriginal and Torres Strait Islander cultures and histories can provide valuable insights to help our business make more considered and thoughtful choices based on different perspectives.

Action	Deliverable	Timeline	Responsibility
Improve employment outcomes by increasing Aboriginal and Torres Strait Islander recruitment, retention, and professional development.	Build understanding of current Aboriginal and Torres Strait Islander staffing to inform future employment and professional development opportunities.	Aug 2024	L&D Manager
	Engage with Aboriginal and Torres Strait Islander staff to consult on our recruitment, retention and professional development strategy.	Aug 2024	Talent Acquisition Partner
	Develop and implement an Aboriginal and Torres Strait Islander recruitment, retention and professional development strategy.	Apr 2025	Talent Acquisition Partner
	Advertise job vacancies to effectively reach Aboriginal and Torres Strait Islander stakeholders.	Apr 2025	Talent Acquisition Partner
	Review HR and recruitment procedures and policies to remove barriers to Aboriginal and Torres Strait Islander participation in our workplace.	Sep 2024, 2025	Head of HR



Opportunities (continued)

Action	Deliverable	Timeline	Responsibility
Increase Aboriginal and Torres Strait Islander supplier diversity to support improved economic and social outcomes.	Develop and implement an Aboriginal and Torres Strait Islander procurement strategy.	Aug 2024	Head of Finance
	Investigate Supply Nation membership.	Aug 2024	Head of Finance
	Develop and communicate opportunities for procurement of goods and services from Aboriginal and Torres Strait Islander businesses to staff.	Sep 2024	Head of Finance
	Review and update procurement practices to remove barriers to procuring goods and services from Aboriginal and/or Torres Strait Islander businesses.	Sep 2024	Head of Finance
	Develop commercial relationships with Aboriginal and/or Torres Strait Islander businesses.	Aug 2025	Head of Finance
Improve CCS's understanding of the financial wellbeing of Aboriginal and Torres Strait Islander Peoples.	Develop guidance materials around cultural sensitivities of financial wellbeing to increase understanding and inform better discussions with our Aboriginal and Torres Strait Islander customers.	Nov 2025	Head of HR L&D Manager
	Investigate opportunities to promote sustainable financial solutions to our Aboriginal and Torres Strait Islander customers.	Nov 2025	RAP Champion L&D Manager



Governance

Action	Deliverable	Timeline	Responsibility
Establish and maintain an effective RAP Working group (RWG) to drive governance of the RAP.	Maintain Aboriginal and Torres Strait Islander representation on the RWG.	Feb, May, Aug, Nov 2024, 2025	Head of GRC
	Establish and apply a Terms of Reference for the RWG.	Mar 2024	Head of GRC
	Meet at least four times per year to drive and monitor RAP implementation.	Feb, May, Aug, Nov 2024, 2025	Head of GRC
Provide appropriate support for effective implementation of RAP commitments.	Define resource needs for RAP implementation.	Mar 2024	Head of GRC
	Engage our senior leaders and other staff in the delivery of RAP commitments.	Apr 2024	RAP Champion RAP Sponsor
	Define and maintain appropriate systems to track, measure and report on RAP commitments.	Apr 2024	Head of GRC
	Appoint and maintain an internal RAP Champion from senior management.	Mar 2024	Head of GRC



Governance (continued)

Action	Deliverable	Timeline	Responsibility
Build accountability and transparency through reporting RAP achievements, challenges and learnings both internally and externally.	Contact Reconciliation Australia to verify that our primary and secondary contact details are up to date, to ensure we do not miss out on important RAP correspondence.	Jun 2024, 2025	A&A Manager
	Contact Reconciliation Australia to request our unique link, to access the online RAP Impact Survey.	1 Aug 2024, 2025	A&A Manager
	Complete and submit the annual RAP Impact Survey to Reconciliation Australia.	30 Sep 2024, 2025	A&A Manager
	Report RAP progress to all staff and senior leaders quarterly.	Feb, May, Aug, Nov 2024, 2025	Head of GRC
	Publicly report our RAP achievements, challenges and learnings, annually.	31 Oct 2024, 2025	RAP Champion
	Investigate participating in Reconciliation Australia's biennial Workplace RAP Barometer.	Feb 2026	A&A Manager
	Submit a traffic light report to Reconciliation Australia at the conclusion of this RAP.	Mar 2026	A&A Manager
Continue our reconciliation journey by developing our next RAP.	Register via Reconciliation Australia's website to begin developing our next RAP.	Oct 2025	A&A Manager



ABOUT THE ARTWORK

'Bila-birrang'

(Wiradjuri – River Journey)

Nathan Peckham

2022

This artwork has a dual meaning.

The symbolism definition tells a story of 3 tribes travelling along a river in search of a plentiful waterhole for their tribes. They use their knowledge of the habits of land and water animals, understanding of the low of the river, and reading the land to find the best waterhole.

The metaphoric explanation of the artwork describes the reconciliation journey collectively undertaken by the 3 sites within Complete Credit Solutions.

The river represents reconciliation, and the 'waterhole' CCS is seeking represents the next step towards an improved understanding and commitment to reconciliation.

Just as the 3 tribes read the land, CCS will need to develop an understanding of what the First Nations communities look like within their specific footprint. This means understanding traditional owners, community groups, and relevant governance structures.

The animal tracks and habits the 3 tribes read represent the guidance the 3 sites will need to seek from their respective First Nations communities to find the waterhole.

Understanding the low of the river represents the need to pay attention to the current state of affairs within those communities and react accordingly.

ABOUT THE ARTIST

Although a contemporary artist by definition, Nathan Peckham of Yurana Creative leans upon the teachings of his Elders and chains them to a rich mixture of modern media and methods to give life to his unique brand of artwork and design.

Nathan endeavours to reach his audience by showcasing the many facets of Australia's rich indigenous culture and in particular, the depth of the culture specific to the Dubbo region which is his ancestral homeland.

As direct descendants of the Tubbah Gah clan within the Wiradjuri nation of New South Wales, the Peckham family is dedicated to the advancement and recognition of Aboriginal art and culture. It's Nathan's tacit objective to continue that undertaking by sharing his artistic talents and understanding.

For the past 25 years, Nathan has been slowly gathering knowledge and skills and applying them to his craft. Over that time, sales of his work have proudly reached all parts of the world, while within Australia he has worked with numerous businesses, government organisations, schools and community groups, continuing the work of his family by sharing his art.

For the future, Nathan strives to continue evolving his style and methods, to ensure he stays on the cutting edge of contemporary Aboriginal art and design.



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