Licensing Guidelines

Locally incorporated Authorised Deposit-taking Institutions

November 2026

AUSTRALIAN PRUDENTIAL REGULATION AUTHORITY | APRA.GOV.AU

Contents

Introduction 4

Chapter 1 – Ability to be supervised 7

Chapter 2 – Sufficient resources 11

Chapter 3 – Skills and experience 20

Chapter 4 – Risk management framework 25

Chapter 5 – Responding to stress 31

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About this guide

The Australian Prudential Regulation Authority's (APRA) Licensing Guidelines (the Guidelines) for locally incorporated Authorised Deposit-taking Institutions (ADIs) aim to assist applicants to demonstrate how they meet APRA's ADI Licensing Criteria (the Criteria) and, more generally, to outline prudent practices for new entrant ADIs undertaking banking business.[1] The Guidelines should be read in conjunction with the Criteria.

While the Guidelines may discuss legal requirements from legislation, regulations or APRA's prudential standards, the Guidelines do not form part of the law, create enforceable requirements or contain legal advice. The Guidelines are provided for information and guidance purposes only.

Applicants are encouraged to obtain professional advice about the application of any legislation or legislative instrument to their circumstances. Users should exercise their own skill and care when relying on any material contained in this guidance.

All applicants seeking a licence to become a locally incorporated ADI must demonstrate to APRA that they satisfy the Criteria. APRA's expectations of what is required to satisfy each criterion will scale commensurately with each applicant's strategy, business mix, risk profile, size and complexity. Box A below provides information on how APRA considers proportionality during the licensing assessment process, with practical examples specific to each criterion provided within each chapter.

This guide follows the structure of the Criteria. Each blue box like this reproduces the relevant legislative criterion, followed by practical guidance to help applicants understand APRA's expectations.

[1] The Criteria and licensing guidance referred to in this document are for locally incorporated ADIs. Entities seeking a licence to operate a foreign ADI branch in Australia are subject to a different set of licensing criteria available on APRA's website. The Government has proposed reforms that would give APRA new responsibilities for the prudential regulation of large stored value facility providers. To prepare for this role, APRA is developing a new prudential framework for these entities. In the interim, applicants seeking to offer purchased payment facilities should continue to apply under the existing purchased payment facility licensing framework.

Glossary

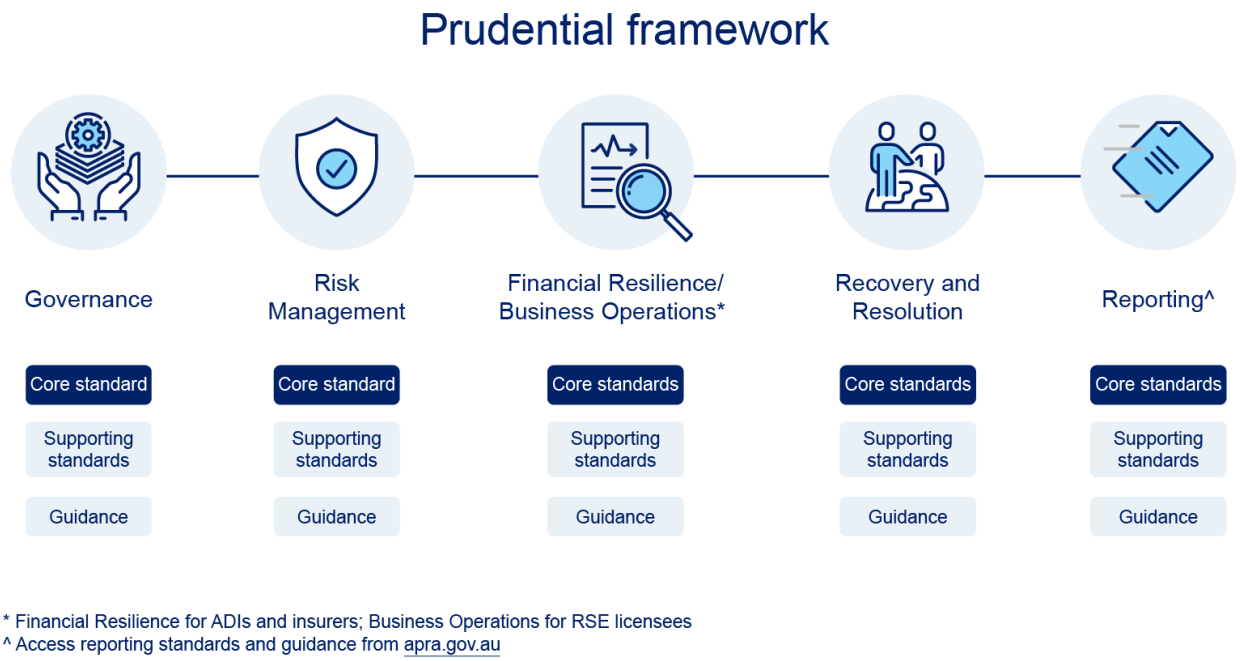
ADI	Authorised deposit-taking institution within the meaning given in subsection 5(1) of the Banking Act.
ADI licence	Authorisation under section 9 of the Banking Act to conduct banking business in Australia, with or without conditions.
APRA	Australian Prudential Regulation Authority.
Banking Act	*Banking Act 1959.*
Banking business	Banking business is defined in subsection 5(1) of the Banking Act.
FAR Act	*Financial Accountability Regime Act 2023.*
FSSA	*Financial Sector (Shareholdings) Act 1998.*
Licence	In this guide refers to the authorisation to carry on banking business in Australia under section 9 of the Banking Act as a locally incorporated ADI.
Licensed	In this guide refers to an entity that is authorised as an ADI.
Licensing	Licensing refers to the process by which APRA grants a licence to a body corporate.
Prudential framework	Prudential framework refers to the legislation, prudential standards and associated guidance material, and reporting standards, which applies to the prudential regulation of ADIs.
Prudential requirements	Includes requirements imposed by the Banking Act, prudential standards made under the Banking Act, reporting standards made under the *Financial Sector (Collection of Data) Act 2001*, conditions on an ADI, and any other requirements imposed by APRA in writing.

Introduction

1) The Criteria comprise both broad and targeted outcomes, set out in a legislative instrument. All applicants seeking an ADI licence must evidence these outcomes by meeting the Criteria. The legislative instrument containing the Criteria can be accessed on the Federal Register of Legislation.[2]

2) The purpose of the Criteria is to provide a minimum set of licensing expectations that apply to all applicants seeking an ADI licence. The Guidelines are structured consistently with the Criteria, with each chapter providing guidance on one licensing outcome, with examples of proportionality in practice. Each chapter concludes with a list of documentation applicants are expected to provide to demonstrate they meet each licensing criterion.

3) Applicants are expected to demonstrate that they meet the Criteria before authorisation. Following authorisation, APRA expects all regulated entities to be compliant with the prudential framework. An overview of the prudential framework is provided below, with the full prudential framework available on APRA's website.[3]



* Financial Resilience for ADIs and insurers; Business Operations for RSE licensees
^ Access reporting standards and guidance from apra.gov.au

4) Applicants may also require licences, approvals or exemptions from other regulatory bodies in order to carry on their proposed business. For example, all ADIs require an Australian Financial Services Licence (AFSL) or an exemption from the Australian Securities and Investments Commission (ASIC).

5) Applicants are expected to have considered any necessary approvals from other regulatory bodies and be suitably advanced in obtaining them before lodging an ADI application. This includes approvals under the Financial Sector (Shareholdings) Act 1998 (FSSA), where relevant.

[2] Refer to: https://www.legislation.gov.au/.
[3] Refer to: https://www.apra.gov.au/banking/Prudential-and-reporting-standards.

6) It is the applicant's responsibility to ensure all necessary approvals are obtained. Applicants should be aware that delays in obtaining required approvals may impact APRA's ability to complete its assessment within the 12-month licensing assessment timeframe.

Required documentation

7) Applicants are required to submit documentation to APRA as part of their application to demonstrate that they meet the Criteria. APRA expects applicants to submit required documentation as early as practicable. First tranche documents must accompany the formal application. APRA permits specified second tranche documents to be submitted within three months.

8) Documents should be submitted to APRA in tranches:

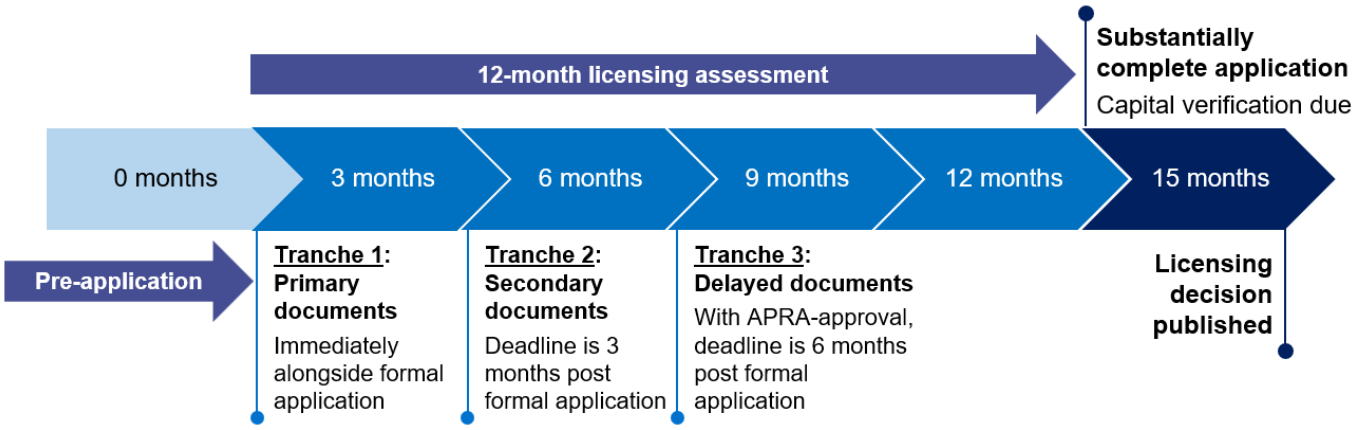
a) **Tranche 1: Primary documents** – Tranche 1 includes the primary documents that are submitted immediately alongside lodging a formal application and paying the application fee. These include the most critical documents that APRA must consider during the licensing assessment. Submitting these documents alongside an application best ensures applicants can meet the 12-month licensing assessment timeline.

b) **Tranche 2**: **Secondary documents** – To reduce the size of an initial submission, APRA allows applicants to submit a set of secondary, supporting documents within the first three months of the assessment process. Tranche 2 documents should be submitted in batches rather than individually. For example, when submitting information regarding specific risk classes (i.e. credit risk), all the documents for the risk class should be submitted together to allow for simultaneous review.

c) **Tranche 3**: **Delayed documents** – In circumstances where lodging specific documents is not feasible in the first three months of the licensing assessment process, with APRA's prior approval, applicants may submit a limited number of additional documents within the first six months of the licensing assessment process.

9) The timing of the three tranches of required documentation is summarised in the below figure.

Figure 1. Document submission tranches



10) The legislative instrument containing the licensing criteria stipulates that APRA, in exceptional circumstances, may extend the timeframe beyond 12 months for an applicant to provide the required documentation. This may include extensions for a specific required document or for tranche deadlines.

11) These exceptional circumstances may include, but are not limited to, external events outside of APRA's and the applicant's control (e.g. court orders, government intervention, or unexpected delays by foreign regulators),

significant operational disruptions (e.g. natural disasters or large-scale cyber incidents), or other circumstances initiated by APRA. Delays largely attributable to the applicant are unlikely to be considered exceptional circumstances.

12) These Guidelines include the required documentation for each licensing criterion at the end of each chapter. A full list of required documentation for an ADI licence application is available from APRA on request.



Box A – How does APRA apply proportionality during the licensing assessment process?

The Criteria set the minimum expectations that **all applicants** must demonstrate before becoming licensed.

APRA takes a proportionate approach when assessing whether an applicant has met the Criteria. This means that APRA's expectations for how an applicant demonstrates they meet the Criteria will scale commensurately with each applicant's strategy, business mix, risk profile, size and complexity.

Smaller, less complex applicants

While APRA expects smaller, less complex applicants to demonstrate that they meet all of the minimum Criteria before authorisation, APRA recognises that the sophistication of some frameworks and capabilities will continue to evolve as the ADI grows. Applicants should therefore focus on demonstrating that their arrangements are appropriate for their proposed operations at commencement and that they have credible plans to enhance those capabilities as the business develops and its risk profile evolves.

Larger, more complex applicants

APRA would typically expect larger, more complex applicants with established businesses, complex funding arrangements and existing loan portfolios to demonstrate more mature and sophisticated risk management and governance commensurate with their risk profile.

'Proportionality in practice' guidance

Each chapter includes a section on 'proportionality in practice', which provides some high-level practical detail on how APRA may apply proportionality during the licensing application process to assist applicants in understanding APRA's expectations. These sections are indicative only. They are not exhaustive and do not consider every type of business model. APRA will assess each applicant on a case-by-case basis given that each application is unique.

Chapter 1 – Ability to be supervised

13) ADIs must be able to be effectively supervised to ensure APRA can assess their financial soundness and resilience. This supports the broader safety and stability of the Australian financial system, protects depositors, and ensures that the Australian community has confidence that ADIs will meet their financial commitments under all reasonable circumstances.

14) Applicants must engage with APRA in an open, constructive and cooperative way that facilitates effective supervision.

15) Applicants must disclose their ownership and control arrangements, including any relationships with other individuals or institutions.

2. A body corporate which applies for authority to carry on banking business in Australia as a locally incorporated ADI must demonstrate that it:

(a) is structured and operates in a manner that APRA can effectively supervise. At a minimum, this would include:

2(a)(i) dealing with APRA in an open, constructive and cooperative way;

16) Applicants must deal with APRA in an open, constructive and cooperative way to show they can be supervised. This requires close and consistent communication between the applicant and APRA. Inability or unwillingness to engage in an open, constructive and cooperative way demonstrates that an applicant is unable to be effectively supervised and restricts APRA from performing its statutory role. For example, failing to respond to communication and/or meeting requests in a timely manner suggests an applicant is unable to demonstrate the criteria.

17) Inability to deal with APRA in an open, constructive and cooperative way is evidence the applicant does not comply with accountable person and accountable entity obligations under the FAR Act. One of those obligations is for the applicant to take reasonable steps to deal with APRA in an open, constructive and cooperative way.

2(a)(ii) providing complete and accurate information to APRA within specified timeframes;

18) APRA expects that a formal licensing application includes a complete and accurate set of required documentation. Incomplete or inaccurate submissions that require multiple follow up requests from APRA means that an applicant is not capable of being supervised. Additionally, failure to provide complete and accurate information within specified timeframes increases the likelihood that the applicant will not meet the Criteria during the 12-month licensing assessment timeline, resulting in the application being refused.

19) APRA expects applicants to demonstrate readiness to meet APRA's reporting requirements. This includes capability to generate and submit accurate reporting to APRA within given timeframes. Applicants should establish relevant authentications to access APRA reporting systems.

20) Applicants are expected to respond to APRA's requests in a timely manner, including where APRA requests further information or documentation to supplement an application. This may demonstrate the applicant's ability to meet the Criteria.

21) Persistently providing incomplete, unclear and/or ambiguous submissions or responses to APRA's requests is further evidence an applicant cannot be effectively supervised.

22) Where an applicant uncovers an error in a submission, the applicant is expected to notify APRA of this error and remedy the submission as soon as possible. Failure to notify APRA and remedy the error in a timely manner could also suggest the applicant does not comply with accountable person and accountable entity obligations under the FAR Act. One of those obligations is for the applicant to take reasonable steps to conduct its business with honesty and integrity, and with due skill, care and diligence.

2(a)(iii) reasonable assurance that the granting of the authority would not result in a breach of the Financial Sector (Shareholdings) Act 1998 by any person;

23) APRA expects an applicant to demonstrate that its owners and other persons with controlling interest will not be in breach of the FSSA. Applicants should provide clear evidence of ownership structures and consider if any persons will require approval under the FSSA before lodging a formal licensing application with APRA.

2(a)(iv) a corporate group structure that does not hinder APRA's ability to exercise its powers and functions; and

24) Applicants are expected to demonstrate that their corporate group structure does not hinder APRA's ability to exercise its powers and functions by providing APRA with clear group organisational structure charts. These charts should detail intragroup organisational arrangements, Board and Board committee memberships, Senior Executives and reporting lines.

25) Overly complex or opaque corporate group structures that hinder APRA's ability to perform its role as a prudential regulator will not satisfy this criterion. This includes corporate group structures that impede APRA from exercising its powers, limit APRA's visibility of key business activities, create unfair competitive advantages, or, if required, prevent APRA from resolving the entity.



Proportionality in practice – Ability to be supervised

Applicants with characteristics such as ...	*APRA would likely expect ...*
Single legal entity, wholly domestic ownership, limited outsourcing arrangements and straightforward reporting lines.	Clear ownership information, simple governance arrangements, timely responses to APRA requests, and evidence that APRA can obtain the information needed to supervise the applicant effectively.
Applicants with characteristics such as ...	*APRA would likely expect ...*
Multiple entities in a corporate group, significant outsourcing arrangements, overseas ownership interests or material intragroup dependencies.	More detailed evidence of governance arrangements, decision-making processes, reporting lines, service provider oversight, ownership structures and intragroup relationships, sufficient to demonstrate that APRA can obtain timely and reliable information and effectively supervise the applicant.
Applicants with characteristics such as ...	*APRA would likely expect ...*
Complex corporate structures, significant cross-border operations or extensive reliance on related parties.	Comprehensive evidence that APRA can obtain timely and reliable visibility over key activities, risks and decision-making and effectively exercise its prudential powers and functions. This may include demonstrating that the applicant can provide APRA with access to information, key personnel, service providers and group-wide governance arrangements, and that no legal, operational or jurisdictional barriers would materially impede APRA's ability to supervise the applicant on an ongoing basis.

Document checklist: Ability to be supervised

#	Document	Tranche
1.1	Certificate of incorporation	First
1.2	Address of registered office and operational offices	First
1.3	Copy of the company constitution	First
1.4	Group Structure Chart including: • Full name of entity or individual shareholder (including, if an entity, its legal status) • Country of incorporation (for entities) or origin (for individuals) • Percentage of shares and voting rights held in applicant and its parent • Nature of relationship between the applicant and any associate (i.e. investor/founder etc. and the influence they will have on the applicant) • Details of any previous bankruptcy and criminal proceedings that the shareholders/associates have been subject to • Source of shareholder funds and provide evidence of any probity/AML/sanctions checks conducted on the shareholder (NB credit reports should not be provided to APRA) • Where the applicant is owned by a large number of minority shareholders or members, a list of the 20 largest shareholders or members • Where the applicant is a part of a group, list all subsidiaries and related companies of the applicant and parent (including dormant) indicating: – where subsidiaries/related companies are regulated, the name of the regulator and nature of business regulated; and – where there are interlinkages and outsourcing arrangements between the applicant and subsidiaries/related companies	First
1.5	Latest accounts for any substantial shareholder that is a body corporate, partnership or trust	First
1.6	FSSA application (if applicable)	First
1.7	Annual statutory accounts for applicant and relevant related firms i.e. holding company (if applicable)	First
1.8	An overview of how the applicant will meet its obligations under the FAR Act	Second
1.9	An overview of the key responsibilities for each accountable person under the FAR Act	Second

Chapter 2 – Sufficient resources

26) Banking business is resource intensive. Applicants must be able to demonstrate they have sufficient financial and non-financial resources to undertake banking business at the point of licensing and to support the sustainable growth and ongoing operation of the ADI.

27) The two most significant categories of financial resources that APRA considers during the licensing process and following authorisation are:

a) **Capital** – capital is the cornerstone of an institution's financial strength. In a regulatory context, capital is a financial cushion available to the ADI to absorb any unexpected losses it experiences in running its business.[4] Applicants are required to maintain an initial capital requirement at the time of licensing and have credible plans demonstrating their ability to maintain sufficient capital post-authorisation. All ADIs must maintain their Prudential Capital Requirement post-authorisation.

b) **Liquidity** – the liquid assets available to an ADI to meet its obligations as they fall due and to survive a severe liquidity stress. Applicants will need to demonstrate that they have robust liquidity risk management frameworks. Following authorisation, ADIs are required to hold a minimum level of liquid assets.

28) This criterion sets requirements that applicants must satisfy before authorisation, including an initial capital requirement and credible post-authorisation capital and liquidity plans. Once authorised, an ADI's ongoing capital and liquidity requirements are set under APRA's prudential and supervisory frameworks. Further information on post-authorisation capital requirements is provided in Box B in this Chapter.

29) One of the most critical non-financial resources for an ADI is its technology resources. Technology provides critical business and operational services to a banking business. Before taking deposits, ADIs must demonstrate that they can sufficiently maintain IT systems to effectively safeguard, recover and manage critical business operations. APRA would expect Operational Risk Management and Information Security processes and practices to be in place to facilitate an adequate technology resilience posture.

2. A body corporate which applies for authority to carry on banking business in Australia as a locally incorporated ADI must demonstrate that it:

(b) has sufficient financial and non-financial resources to prudently conduct banking business. At a minimum, this would include:

2(b)(i) a Common Equity Tier 1 Capital amount equal to the greater of:

(A) $15 million; or

(B) the body corporate's forecast operational expenditure for the following nine months;

[4] Further information on regulatory capital and APRA's capital requirements is provided in this APRA explains article: https://www.apra.gov.au/apra-explains-capital.

30) APRA expects applicants to be open and cooperative when discussing their capital. This includes providing APRA with clear and accurate documentation on their current capital position and their forecast operational expenditure. Applicants should not mislead or be ambiguous about the type or level of capital.

31) Capital instruments must meet APRA's requirements for inclusion as regulatory capital. In practice, this will generally involve a simple share structure consisting of only one class of share that is fully subordinated to all other capital and debt, has full voting rights, and has equal rights across all shares with respect to dividends and rights in liquidation. APRA expects applicants to submit a self-assessment against APRA's prudential requirements for measuring capital, as well as copies of their constitution and any shareholder agreements or other documents associated with the issuance of the applicant's capital instruments.

32) Prudent applicants would avoid capital instrument features or share structures that are unnecessarily complex. Complex features and structures may complicate APRA's prudential assessment and can reduce the clarity or effectiveness of loss absorption.

33) APRA expects applicants to obtain written verification from their appointed external auditor that the applicant meets the minimum regulatory capital requirements required for authorisation including confirmation of the quantum and composition of capital available to the applicant. This verification should be provided as soon as practicable after APRA advises the applicant that its application is substantially complete. This verification forms part of APRA's final decision-making process.

2(b)(ii) credible plans covering at least the two years following authorisation that demonstrate how the body corporate will maintain Common Equity Tier 1 Capital at least equal to the greater of:

(A) $10 million;

(B) the body corporate's forecast operational expenditure for the following six months, recalculated quarterly; or

(C) the percentage, as determined by APRA, of Risk-Weighted Assets calculated in accordance with Prudential Standard APS 110 Capital Adequacy;

including under stress scenarios;

34) Applicants are expected to demonstrate, through credible financial forecasts and capital plans, that they will have sufficient capital to execute their business strategy and support future growth while continuing to meet APRA's prudential capital requirements. Applicants with limited capacity to generate or raise capital after authorisation would need to demonstrate that additional capital is committed or is otherwise reliably available before authorisation.

35) Applicants should develop and submit a Board-approved Internal Capital Adequacy Assessment Process (ICAAP) as part of their licensing application. The ICAAP should demonstrate how the applicant will maintain adequate capital consistent with its business plan, risk profile, forecast growth and applicable prudential requirements. This includes its strategy for navigating potential stress events and how these stress events impact the applicant's forecast operational expenditure.

36) Applicants are expected to maintain internal capital management targets above minimum regulatory requirements, including regulatory capital buffers in stable operating conditions. These internal management

targets should reflect forecast growth, business volatility, stress testing outcomes and the time required to execute capital raising or other contingency actions. Internal management targets are designed to be available in stress and should be incorporated appropriately into an applicant's capital management plans.

37) Applicants should tailor stress scenarios and sensitivity analyses, so they are suitable to their risk profile and business plans. For example, applicants that expect to offer residential mortgages may develop stress scenarios and undertake sensitivity analysis relating to changes in the unemployment rate, house prices, gross domestic product growth rate, and changes to monetary policy.



Box B – How does APRA set capital requirements for new ADIs?

At the point of authorisation

An applicant must hold the initial capital amount specified in criterion 2(b)(i) at the point of authorisation. This is the initial capital requirement at the time the applicant becomes an ADI. Once the applicant is authorised, this initial capital requirement ceases to apply.

Following authorisation

Following authorisation, the ADI becomes subject to APRA's prudential and supervisory frameworks. The ADI's ongoing minimum capital requirements, including its Prudential Capital Requirement and applicable regulatory capital buffers, are determined under those frameworks. They are not set by APRA's licensing framework.

Why does APRA apply supervisory judgement?

APRA applies supervisory judgement to its prudential requirements when determining the capital requirements appropriate for new entrant ADIs. This is because the usual approach of determining capital requirements as a percentage of risk-weighted assets may produce a low capital amount that is not commensurate with risk.

This may occur because the ADI has a small balance sheet, with a small loan portfolio, and/or predominantly holds assets with relatively low risk weightings. In these circumstances, APRA's credit risk capital requirements may not adequately reflect the capital that is needed to absorb losses, support planned growth, or to execute an orderly exit.

APRA may therefore use supervisory judgement to apply an ongoing minimum Prudential Capital Requirement and applicable regulatory capital buffers that are more appropriate to a new entrant ADI's circumstances. APRA may apply these requirements by reference to minimum dollar amounts, forecast operating expenditure and/or risk-weighted assets. When setting capital requirements by reference to risk-weighted assets, this will likely be higher than the minimum requirements under APRA's prudential framework given the unique risks facing new entrant ADIs.

What is the purpose of criterion 2(b)(ii)?

The credible plans to maintain minimum capital levels required by criterion 2(b)(ii) do not set the ADI's post-authorisation capital requirements. Rather, it enables APRA to assess whether the applicant has credible plans to maintain sufficient capital under a range of possible prudential capital settings during its first two years of operation.

APRA will discuss the post-authorisation capital requirements with the applicant during the licensing assessment, with the applicable requirements being determined under APRA's prudential and supervisory frameworks.

Capital requirements change over time

APRA continually reviews Prudential Capital Requirements for ADIs. This includes new entrants. The appropriate methodology and calibration may change as an ADI grows, its risk profile develops, its operations mature, and risk-weighted assets become more representative of its business.

The timing of any transition towards APRA's usual approach for established ADIs will be determined on a case-by-case basis through supervision.

2(b)(iii) liquid assets that meet minimum requirements under Prudential Standard APS 210 Liquidity;

38) APRA will likely determine a new entrant ADI as a Minimum Liquidity Holdings (MLH) ADI. APRA therefore expects applicants to demonstrate compliance with the MLH requirements set out in APRA's prudential framework. This includes both quantitative and qualitative requirements.

a) **Quantitative requirements** – MLH ADIs are required to maintain a percentage of their liabilities in specified eligible liquid assets. While the requirement for MLH ADIs under the prudential framework is 9 per cent, APRA typically sets a higher requirement for new entrant ADIs given the different risk profile compared to established incumbents. APRA will engage applicants throughout the licensing process to determine their tailored MLH requirement following authorisation. This requirement will be set post-authorisation.

b) **Qualitative requirements** – in addition to maintaining appropriate levels of liquid assets, applicants are also required to demonstrate to APRA that they have robust liquidity risk management frameworks. Applicants are expected to develop and provide to APRA their Board-approved liquidity risk management framework, which, at a minimum, contains:

   i) **Liquidity risk appetite statement** – defines the level of liquidity risk that the applicant is willing to assume;

   ii) **Liquidity management strategy and policy** – sets out the applicant's strategy for managing its liquidity risk, consistent with its liquidity risk appetite statement;

   iii) **Operating standards** – policies, procedures and controls for identifying, measuring, monitoring and controlling the applicant's liquidity risk in accordance with its liquidity risk appetite statement;

   iv) **Funding strategy** – an overview of the applicant's funding strategy post-authorisation over the next three years, with a specific focus on the first 18 months. Typically includes both qualitative and quantitative items, key outcomes and the strategies that will be used to achieve the outcomes; and

   v) **Contingency funding plan** – sets out the applicant's strategies for addressing liquidity shortfalls in emergency situations.

2(b)(iv) credible plans that demonstrate how the body corporate will maintain, in the three years following authorisation, liquid assets that meet minimum requirements under Prudential Standard APS 210 Liquidity, including under stress scenarios;

39) Applicants are expected to develop plans on how they intend to manage their liquidity risk over at least the first three years of conducting banking business post-authorisation. These plans should be consistent with their liquidity risk management frameworks and comply with APRA's prudential framework.

40) Liquidity risks for new entrant ADIs are expected to fluctuate over time as the business grows and matures. While APRA requires credible plans to maintain minimum requirements over a three-year period, APRA expects applicants to have a particular focus on the first 18 months post-authorisation. This is an important phase in growing an ADI, where the ADI begins building its deposit book. APRA requires applicants to have robust management of their deposit book to ensure depositors are protected if the ADI experiences stress.

2(b)(v) being operationally ready to generate revenue through at least one financial product;

41) One of the biggest challenges facing new entrant ADIs is generating revenue to sustain their business. To ensure applicants are prepared, APRA expects applicants to be operationally ready to offer revenue-generating financial products (for example, a personal loan product) before receiving an ADI licence. This includes, for example, having a designed product ready and approved by their internal governance processes, developed terms and conditions for distributing to future customers, operational processes and procedures, clear onboarding pathways, and adequate staffing to manage the product.

42) Applicants are also expected to have credible plans to fund the financial product, whether through existing wholesale funding, support from its parent company, or shareholder capital. If the intent is to fund products through retail deposits following authorisation, applicants are expected to demonstrate that they have a sustainable funding strategy and credible plans to generate sufficient revenue to support their business model over time. This is to ensure the business can maintain revenue during the costly post-authorisation growth phase.

2(b)(vi) being operationally ready to accept deposits;

43) Taking deposits is central to conducting banking business. An applicant must demonstrate that it is operationally ready to accept deposits before receiving a licence and have IT systems in place to support end-to-end transactions. This includes, for example, having access to the Australian payments system, either through credible plans to access directly following authorisation or through immediate access via a third-party service provider.

44) Applicants are not legally permitted to accept and manage deposits prior to authorisation. Instead, applicants may use their own funds to test operational readiness. To demonstrate operational readiness, applicants are encouraged to focus on ensuring systems are fit for purpose and operate as intended (e.g. calculate interest correctly), developing and testing customer onboarding processes, preparing to publish relevant disclosures and other customer communications, developing operational controls to detect fraud and other financial crime, and ensuring they have sufficient resourcing to support deposit products on launch (e.g. staffing).

2(b)(vii) having IT systems that are fit for purpose and have been tested and independently validated; and

45) Applicants should develop and maintain clear IT policy frameworks guided by high-level information security principles. IT policy frameworks are expected to include:

a) information on access, design and detection controls, escalation and incident notification both internally and to APRA;

b) core business systems that have been independently validated to be functionally sound and resilient, maintain accurate records and operate effectively;

c) a strategy on how IT systems will be developed and scaled to meet technology and business requirements;

d) IT controls that are implemented, tested and maintained, and that cover the entire lifecycle of information assets;

e) an IT strategy that is aligned to the business strategy;

f) evidence of a clear delineation of roles concerning the oversight, operation and control testing of information security; and

g) outsourcing and third-party arrangements subject to a contractual master services agreement.

Proportionality in practice – Sufficient resources

Applicants with characteristics such as ...	*APRA would likely expect ...*
Narrow product offerings, relatively simple funding arrangements and modest balance sheet growth (or higher growth forecasts but from a small base).	Credible capital and liquidity plans, realistic financial forecasts with greater focus on the first two years post-authorisation, reasonable stress testing assumptions and operational readiness consistent with the proposed business model. IT systems that are fit for purpose, independently validated and capable of supporting the proposed business model. Operationally ready to generate revenue through at least one financial product with credible funding plans.
Applicants with characteristics such as ...	*APRA would likely expect...*
Growing balance sheets from existing loan products, high or complex growth strategies to be implemented post-authorisation or increasing product diversity.	More developed capital management, liquidity management and financial forecasting capabilities, supported by longer-term forecasts, broader stress scenarios and credible contingency actions. APRA would expect evidence that financial, operational and technology resources can scale as the business grows, and that the applicant has or can generate a sustainable revenue stream.
Applicants with characteristics such as ...	*APRA would likely expect ...*
Material loan portfolios, complex funding structures, significant technology dependencies or large balance sheets.	Sophisticated capital planning, liquidity analysis, stress testing and contingency arrangements supported by robust data, governance and information management capabilities. Strong evidence that technology systems, cyber resilience, and data integrity can all be maintained during significant periods of growth or stress. Significant revenue is being raised through diverse product offerings.

Document checklist: Sufficient resources

#	Document	Tranche
2.1	Self-assessment against the requirements in *Prudential Standard APS 110 Capital Adequacy* and *Prudential Standard APS 111 Capital Adequacy: Measurement of Capital*. This should include: • Categorising each tranche of capital to a category of Regulatory Capital (Common Equity Tier 1 or Tier 2). • A determination of whether the applicant meets the minimum capital requirements. • A determination of whether the applicant complies with restrictions on capital reductions and distributions.	First
2.2	Copies of all relevant issuance documentation for capital instruments	First
2.3	ICAAP	First
2.4	ICAAP Summary Statement	First
2.5	Liquidity risk appetite statement	First
2.6	Liquidity management strategy and policy including: • Composition and maturity of assets and liabilities • Diversity and stability of funding sources • Approach to managing liquidity in different currencies, across borders and across business lines and legal entities • Approach to intraday liquidity management	First
2.7	Operating standards for identifying, measuring, monitoring and controlling liquidity risk in accordance with liquidity risk appetite statement	First
2.8	Funding strategy	First
2.9	Contingency funding plan	First
2.10	Liquidity stress testing	First
2.11	IT strategy	First
2.12	IT organisation chart	First
2.13	Overview systems diagram, showing main applications	First
2.14	Overview of network diagram	First
2.15	Overview description of IT, including: • Principal applications to be used and how and by whom they will be supported. • For new core systems being implemented, high-level implementation plans, migration plans, test plans, and timetables • Principal data centres and other IT staff locations, and what each is used for • Principal service providers, and services provided by each, whether external or intragroup, identifying any link to the applicant entity, and including supplier location, rationale for the outsourcing, and supplier due diligence and selection process • Details of oversight responsibilities and arrangements, systems and controls for each outsourced function material to the applicant entity's management and operations • Principal locations served	First

	• Resilience, business continuity and disaster recovery arrangements including key controls to recover information assets in response to a range of scenarios (e.g. service provider outage, local outage and application outage) • Key controls to detect, prevent and respond to security incidents in order to maintain confidentiality, integrity and availability of information assets (hardware, software and data) • Independent validation of design and operating effectiveness • High-level risk and control assessments, risk profiles, plausible worst-case scenarios and alignment to risk appetite and tolerance	
2.16	Testing strategy to ensure systems are fit for purpose (e.g. systems maintain fair and true records for financial obligations, systems calculate interest accurately etc.)	Second
2.17	Penetration test results identifying scope and results of the penetration test(s), including actions taken to eliminate shortcomings and planned frequency	Second
2.18	Independent validation that systems are 'fit for purpose'	Second
2.19	IT Security Policies, Standards and Procedures	Second
2.20	Information security roles and responsibilities	Second
2.21	External auditor's certificates verifying the level of capital and capital ratios	When requested by APRA

Chapter 3 – Skills and experience

46) The Board is critical for good governance and is ultimately responsible for the sound and prudent management of an ADI. APRA expects applicants to comply with APRA's Board composition requirements before lodging an ADI licensing application. Applicants will need to demonstrate that the Board and executive team are appropriately composed and collectively have the skills, experience and capacity to establish, operate and oversee the ADI's business operations, risk management, risk culture, and strategic direction.

2. A body corporate which applies for authority to carry on banking business in Australia as a locally incorporated ADI must demonstrate that it:

(c) has suitable skills and experience to prudently conduct banking business. At a minimum, this would include:

2(c)(i) responsible persons who are fit and proper;

47) Applicants must satisfy APRA that they have sufficiently robust policies and procedures in place to ensure that responsible persons who hold key positions within the proposed ADI are fit and proper.

48) APRA expects applicants to provide their Board-approved fit and proper policy and the pre-appointment fit and proper assessments of responsible persons conducted in accordance with that policy.

49) Fit and proper assessments should clearly articulate how the applicant has determined that the responsible person possesses the skill, character, care, diligence, honesty, integrity, judgement, qualifications, experience, time and capacity to properly perform the duties of the role. The applicant must undertake a rigorous process to verify information. Self-declarations and self-assessments are not sufficient.

50) Fit and proper assessments should include consideration of actual or potential conflicts of interest, including intragroup conflicts and related party situations, and align with the applicant's conflict management policy. Conflicts of interest are expected to be identified, assessed, managed and, where appropriate, disclosed.

51) Where the responsible person has made a disclosure or negative information has been sourced from probity checks, this should be addressed in the assessment with details on how the applicant gained comfort that the disclosure does not impact on the responsible person's fitness and propriety in relation to their proposed role.

2(c)(ii) a Board of at least five directors, with a majority being independent and a majority being ordinarily resident in Australia;

52) APRA expects applicants to develop Board composition and independence settings to ensure the Board can provide impartial judgement and effective oversight.

53) APRA expects that, before lodging the licensing application, the applicant can demonstrate that at least five directors have been appointed and that a majority are independent and a majority are ordinarily resident in Australia.

54) APRA expects the applicant to provide an organisational chart for the locally incorporated body corporate detailing the Board, Board committee membership and Senior Executives, including reporting lines.

2(c)(iii) a Board with the necessary skills and experience, collectively, to prudently oversee banking business operations;

55) APRA expects applicants to develop and provide a Board charter that outlines the Board's role, responsibilities, authority, composition, governance arrangements, and how it oversees management and risk.

56) Applicants are expected to demonstrate that the proposed Board collectively has the required skills and experience to competently oversee and direct the business. APRA expects the applicant to submit a Board skills matrix which clearly identifies the Board's skills, experience and behavioural requirements and a strategy to address any gaps.

57) APRA expects applicants to implement governance arrangements that are fit for purpose and operate effectively in practice, including a governance framework that clearly allocates roles and decision rights, supports robust information flows to the Board and its committees to enable challenge, and promotes effective performance.

2(c)(iv) Accountable Persons under the Financial Accountability Regime Act 2023 who have the necessary skills and experience to deliver the business plan and discharge their allocated accountabilities, which must be clearly defined and documented; and

58) Applicants are expected to comply with the FAR Act. For applicants categorised as enhanced entities under the FAR Act, this includes clarifying roles within the entity and the breadth of accountability for those roles in APRA's template for Accountability Statements or similar. Applicants categorised as core entities under the FAR Act are encouraged to use the APRA template for Accountability Statements as a guide.[5]

59) Applicants must take reasonable steps to ensure that each of its Accountable Persons meets their accountability obligations under the FAR Act.

60) Applicants should ensure that Accountable Persons responsible for the operation and risk management of their business possess an appropriate level of skill and experience to discharge their allocated accountabilities. APRA expects applicants to provide a resume for all Accountable Persons.

61) Accountable Persons must comply with obligations under the FAR Act, including to act with due skill, care and diligence.

[5] Refer to: https://www.apra.gov.au/financial-accountability-regime-accountability-statement-guidance-and-template.

Proportionality in practice – Skills and experience

Applicants with characteristics such as ...	*APRA would likely expect ...*
Focused and more narrow business models with limited product offerings and relatively simple organisational structures.	A Board and executive team that collectively possess the skills, banking experience and capacity necessary to oversee the proposed business and discharge key responsibilities effectively. Single Board members may be relied upon for their expertise in multiple risk areas.
Applicants with characteristics such as ...	*APRA would likely expect ...*
Existing growing business, increasing customer numbers and broader product offerings.	Clear evidence that governance arrangements, Accountable Persons and specialist capabilities are evolving appropriately to support the increasing complexity of the business.
Applicants with characteristics such as ...	*APRA would likely expect ...*
Large and diverse range of products and services, larger organisational structures and more complex risk profiles.	Greater depth of specialist expertise, more developed governance arrangements and clearer segregation of responsibilities.

Document checklist: Skills and experience

#	Document	Tranche
3.1	Organisational chart (including any roles yet to be filled)	First
3.2	Board and committee structure including names of members and date of appointment	First
3.3	Applicant's assessment of the Board including: • Assessment of skills and experience required collectively by the Board for the proposed business model • Assessment of the collective skills required by the independent directors to enable them to provide effective challenge • Gaps identified in the proposed Board against the collective skills and experience assessment • The plans to resolve the gaps identified • The recruitment process, including such areas as compliance with anti-discrimination best practice	First
3.4	Remuneration policy	First
3.5	Overview of the intended structure, resources, responsibilities and reporting lines for: • Liquidity and treasury • Risk and Compliance • Internal Audit	First
3.6	Fit and Proper Policy	First
3.7	For each individual who is currently appointed to, or will hold, a Responsible Person position upon licensing: • Position title • Full name • Date of birth (for identification purposes only) • Role description and main responsibilities • Copy of the assessment completed under fit and proper including evidence of probity, and competency and capability in relation to the position held.	First (and as appointed)
3.8	Board Charter	Second
3.9	Board Renewal Policy	Second
3.10	Board performance assessment procedure	Second
3.11	Remuneration Committee charter/terms of reference	Second
3.12	Audit Committee charter/terms of reference	Second
3.13	Risk Committee charter/terms of reference	Second
3.14	Board delegation of authority	Second
3.15	Conflicts of interest management policy	Second
3.16	Training and competence regime	Second

Chapter 4 – Risk management framework

62) The risk management framework is central to conducting prudent banking business and to ensure business objectives are met in a well governed environment. It enables an ADI to identify, analyse and manage the current and emerging material risks within its business. Effective risk management supports risk-based decision-making and oversight at each level within the business and provides the Board with a comprehensive business-wide view of material risks. The risk management framework must be forward looking and fit for purpose beyond the point of licensing to remain effective for material changes and developments in the business.

63) Effective operational risk management is important to ensure applicants can withstand and recover from operational disruptions and minimise adverse impacts on customers. Applicants will need to demonstrate a comprehensive end-to-end view of critical operations, identifying processes and resources needed to deliver critical operations through a disruption.

2. A body corporate which applies for authority to carry on banking business in Australia as a locally incorporated ADI must demonstrate that it:

(d) has a risk management framework to prudently conduct banking business. At a minimum, this would include:

2(d)(i) having a risk management framework that is proportionate to the strategy, business mix, risk profile, size and complexity of the body corporate's business model;

64) APRA expects the risk management framework to:

a) include the applicant's business plan;

b) contain a risk appetite statement and risk management strategy that identify material and emerging risks, and explain how they are to be managed within the applicant's risk appetite;

c) evidence a sound risk culture (or development of a sound risk culture) that supports consistent operation within risk appetite;

d) contain policies and procedures with clearly defined and documented roles, responsibilities and formal reporting structures for the management of all material risks;

e) contain clearly defined roles and responsibilities of a designated risk management function;

f) contain an ICAAP that ensures adequate capital is held against the applicant's material risks;

g) contain management information systems that are adequate, both under normal circumstances and in periods of stress, and can enable the business to measure, assess and report on all material risks across the institution; and

h) contain a review process that assesses the extent to which the risk management framework is effective in identifying, measuring, evaluating, monitoring, reporting, and controlling or mitigating material and emerging risks.

65) APRA expects applicants to demonstrate they have dedicated risk ownership, functionally independent review and challenge, and independent assurance functions.

66) APRA expects the Board to make and provide to APRA its annual Risk Management Declaration.

2(d)(ii) having controls in place for key operational risks, including risks related to critical operations and the use of material service providers; and

67) In managing its operational risk, APRA expects applicants to:

a) identify critical operations using a sound, clear and documented methodology;

b) determine the tolerance levels for time, data loss and service level for each critical operation using a sound, clear and documented methodology;

c) identify all material service providers (MSPs) and record them in an MSP register that can be submitted to APRA;

d) have an active process to notify APRA about material events, tolerance breaches and MSP changes;

e) have Board governance and oversight with clear roles and responsibilities;

f) establish risk profiling and reporting, using them to support oversight;

g) establish accountability for conducting critical operations, identifying and monitoring MSPs;

h) ensure that MSP contracts comply with APRA's prudential requirements;

i) focus Business Continuity Management (BCM) on critical operations; and

j) align BCM scenarios with BCM improvement and focus scenarios on severe yet plausible events for critical operations and MSPs.



Proportionality in practice – Risk management framework

Applicants with characteristics such as ...	*APRA would likely expect ...*
Focused and narrow business models, limited product sets or a less complex risk profile.	Risk management framework that clearly identifies, assesses, monitors and manages all material risks relevant to the business model. This would include adequate controls and control testing. The risk management strategy and risk appetite statement would include clearly articulated risk metrics, limits or triggers aligned to the applicant's key risks. Plans to strengthen the risk management framework to consider emerging risks. Reporting would support timely escalation and decision-making by Senior Management and the Board.
Applicants with characteristics such as ...	***APRA would likely expect ...***
Expanding operations, broader product sets, increasing use of third-party providers or more complex risk profile.	A more expansive risk management framework that supports increasing operational complexity. This would include enhanced controls and controls testing, risk reporting, monitoring, and oversight arrangements, with a more developed risk management strategy and risk appetite statement. Risk appetite metrics, limits and triggers would generally be more mature and support reporting and escalation processes.
Applicants with characteristics such as ...	***APRA would likely expect ...***
Significant outsourcing, diverse business activities, complex operating environments or a complex risk profile.	Mature and comprehensive risk management capabilities, heightened monitoring of operational risks including risks relating to critical operations and material service providers, enhanced management information systems, more extensive controls and control testing, stronger independent challenge and greater assurance over material and emerging risks. A detailed risk management strategy and risk appetite statement with clearly defined accountabilities, a comprehensive suite of risk metrics, limits and triggers, and formal escalation protocols. Reporting would provide Senior Management and the Board with timely, risk-based information to support oversight of a complex and evolving risk profile and risk-based decision making.

Document checklist: Risk management framework

#	Document	Tranche
4.1	Business plan including: • Explanation of the applicant's overall strategic goal, why the applicant has been established and has decided to carry on the business for which it is seeking a licence • Description of the proposed business, including: – Geographical scope of operations and future expansion plans – Target markets and customer segmentation – Clients (e.g. types, sources, client base) – Products and services (e.g. borrowing, lending or off-balance sheet activities, and any future dated products and services that may not be in the scope of the current business plan) – Delivery channels (e.g. branches, internet, postal, agencies, subsidiaries) – Pricing – Promotion and marketing (initial and future) – Funding profile and diversification – Details of any planned trading book activity • High-level summary of financial resources including details of the source of funds that will be injected into the applicant to support its proposed activities. • 5-year financial projections including: – Detailed balance sheet, cash flow and earnings (including assumptions) – Key financial and prudential ratios (e.g. capital ratios, liquidity ratios, etc.) – Detailed explanation of the initial and long-term viability of the business model – Stress scenarios to show what will be the effect of key assumptions underpinning the business model and its viability not turning out as planned (upside and downside scenarios)	First
4.2	Implementation plan through to the point when the applicant is fully operational	First
4.3	Risk appetite statement	First
4.4	Risk management strategy	First
4.5	List of policies and procedures supporting the management of material risks throughout the institution that the applicant has in place and is ready to provide on request.	First
4.6	Overview of the management information system in place for measuring, assessing and reporting on all material risks across the institution	First
4.7	List of reports proposed to be provided to the board	First
4.8	Credit risk management policies and procedures addressing: • Monitoring of credit quality • Identification and appropriate measurement of impaired facilities • Estimation of inherent credit risk in its business • Recognition of collateral • Write-down or write-off of uncollectible facilities • Validation of credit assessment and provisioning and reserve process	First

	• Adequacy of provisions and reserves covering existing and estimated future credit losses and the timely establishment of such provisions and reserves • Production of data and other information required for adequately assessing the credit risk exposure of impairment, accounting for asset impairment and reporting to APRA • Delegations for approval of credit facilities	
4.9	Lending policy, including: • Underwriting standards • Risk tolerances and limits	First
4.10	Large exposures and risk concentrations policy	First
4.11	Operational Risk Management Framework	First
4.12	Operational Risk Profile	First
4.13	Critical Operations Register	First
4.14	Critical Operations Tolerance Statements	First
4.15	Business Continuity Plan	First
4.16	Service Provider Management Policy	First
4.17	Self-assessments against relevant APRA prudential standards[6]	First
4.18	Code of Conduct	Second
4.19	Whistleblower Policy	Second
4.20	Details of review process to ensure that the risk management framework is effective.	Second
4.21	Consequence management policy	Second
4.22	Related entities policy	Second
4.23	Market risk management policy including • Asset and liability management • Investment strategy/management	Second
4.24	Material Service Provider Register	Second
4.25	Material Service Provider Risk Assessments, Contract Assessment and Exit Plans	Second
4.26	Details of oversight responsibilities and arrangements, systems and controls for each MSP	Second
4.27	Business Continuity Plan review and testing program	Second
4.28	Product governance policy	Second
4.29	Fraud management policy	Second
4.30	Incident (and near miss) Management policy	Second
4.31	Financial Crime Risk Management Questionnaire - Provided by APRA	Second
4.32	Compliance Framework (can be amalgamated in Risk Management Framework)	Second
4.33	Confirmation of Board approval of the AML & CTF Program	Second

[6] Depending on individual business models, this would typically include: *Prudential Standard APS 310 Audit and Related Matters*; *Prudential Standard CPS 510 Governance*; *Prudential Standard CPS 511 Remuneration*; *Prudential Standard CPS 520 Fit and Proper*; *Prudential Standard CPS 220 Risk Management*; *Prudential Standard APS 220 Credit Risk Management*; *Prudential Standard APS 221 Large Exposures*; *Prudential Standard CPS 230 Operational Risk Management*; *Prudential Standard CPS 234 Information Security; Prudential Standard APS 210 Liquidity*; and *Prudential Standard CPS 190 Recovery and Exit Planning*.

4.34	Internal audit scope and plan including planned audit coverage for the first 12 months following licensing	Second
4.35	Appointed auditor terms of engagement and if applicable other instructions or correspondence, including management letters	Second
4.36	Appointed auditor independence declaration	Second
4.37	Fit and proper assessment of appointed auditor	Second
4.38	External audit plan, including planned audit coverage for the first 12 months following licensing	Second
4.39	Confirmation of ability to complete required regulatory returns	Second

Chapter 5 – Responding to stress

68) Applicants are expected to develop and maintain a credible and effective Recovery and Exit Plan (REP) that sets out how they would respond to a stress that threatens their viability. Applicants must not assume extraordinary public sector support in their recovery and exit planning.

69) APRA expects a REP to be integrated into an applicant's risk management framework, capital management and liquidity management frameworks, and business plans.

2. A body corporate which applies for authority to carry on banking business in Australia as a locally incorporated ADI must demonstrate that it:

(e) has credible plans for effectively responding to a stress event that threatens its viability. At a minimum, this would include:

2(e)(i) recovery options that would be relevant and plausible during stress;

70) APRA expects applicants to include in their REP the operational details for executing recovery options that would be relevant and plausible during stress. These recovery options are designed to support the applicant's ability to restore financial resilience in the event of a threat to its viability, and which may avoid the need to exit from banking business.

71) Recovery options should be appropriate to the strategy, business mix, risk profile, size and complexity of the applicant. For example, smaller start-up applicants may consider options such as capital injections (depending on ownership structures), changes to business and investment strategies, cost savings, or risk reductions.

2(e)(ii) at least one credible option for an orderly and solvent exit from banking business; and

72) Applicants should also include in their REP at least one credible option for an orderly and solvent exit from banking business, in situations where recovery options are not effective.

73) These options should be appropriate to the strategy, business mix, risk profile, size and complexity of the applicant. For new entrant ADIs at the early stage of their development, APRA considers that a return of deposits option is likely to be the most feasible exit option. However, this may change as the ADI scales.

74) An applicant would be capable of executing an exit from banking business without relying on the declaration of the Financial Claims Scheme (FCS) by the Australian Government or the use of APRA's resolution powers, and without an impact on financial system stability.

2(e)(iii) being operationally ready for the activation of the Financial Claims Scheme.

75) APRA expects applicants to develop an FCS operational plan. This plan sets out the process, resources, data/systems, communications and arrangements with critical service providers to meet both ongoing testing

requirements and to facilitate a payout or transfer in the event the Australian Government declares the FCS in relation to the applicant.



Proportionality in practice – Responding to stress

Applicants with characteristics such as ...	*APRA would likely expect ...*
Relatively simple business models, straightforward funding arrangements and smaller balance sheets.	A focused set of credible recovery options and a feasible exit strategy with a credible plan for returning deposits. While a REP would not rely on the FCS, there should be sufficient operational readiness to meet FCS activation requirements.
Applicants with characteristics such as ...	***APRA would likely expect ...***
Growing funding bases, increasing balance sheet complexity or greater operational dependencies.	A REP supported by more comprehensive stress analysis, a broader range of recovery options and greater consideration of funding, liquidity and operational dependencies. The REP would typically include more sophisticated indicators, triggers, monitoring arrangements and decision-making processes. Exit options may include voluntary transfers in addition to a return of deposits.
Applicants with characteristics such as ...	***APRA would likely expect ...***
Complex funding structures, significant outsourcing arrangements or more interconnected business models.	Mature recovery and exit planning supported by severe but plausible stress scenarios, a broad range of credible recovery and exit options, detailed execution planning and robust governance arrangements. This would typically include well-developed triggers and escalation frameworks, analysis of interdependencies and barriers to execution, and strong operational readiness to respond to severe stress events.

Document checklist: Responding to stress

#	Document	Tranche
5.1	Recovery and Exit Plan	First
5.2	FCS communications policy	Second
5.3	FCS attestation	Second
5.4	FCS operational plan	Second
5.5	FCS payment file test[7]	Second

[7] Test specifications are available from APRA on request.