



Anti-Bribery and Anti-Corruption Policy Summary

Why does ANZ have an Anti-Bribery and Anti-Corruption Policy?

ANZ is committed to complying with all applicable anti-bribery and anti-corruption laws and applying and maintaining the highest level of ethical behaviour and standards in combating bribery and corruption in all of the jurisdictions in which it operates. An objective of the Anti-Bribery and Anti-Corruption Policy is to define unacceptable behaviour and activity relating to bribery and corruption and to direct its management, prevention and identification. It is one of the policies supporting ANZ's Code of Conduct.

How does the Anti-Bribery and Anti-Corruption Policy apply at ANZ?

The policy applies to all employees and contractors of Australia and New Zealand Banking Group Limited (ANZ) and its controlled entities, including when acting at ANZ's request in operational roles or as directors for other entities.

The implementation of the policy is supported by detailed requirements which serve as a single and consistent anti-bribery and anti-corruption standard across the ANZ group. As part of the management, prevention and detection of bribery and corruption issues, mandatory training is conducted throughout ANZ, with additional role-specific training tailored to particular roles. Regular risk assessments and monitoring activities are also conducted across the group to identify and manage bribery and corruption risks.

Everyone at ANZ is encouraged to immediately report any concerns about bribery and corruption, and may use the mechanisms set out in the Whistleblower Policy, which ensures reports are treated appropriately and the person raising the concern is protected and can remain anonymous. Instances of bribery or corruption may be investigated by Group Investigations and breaches of the policy may lead to disciplinary action, including dismissal.

Key obligations

Under the policy ANZ will not:

- Offer, promise, give, request, and agree to receive or accept a bribe (including bribes in the form of a facilitation payment, secret commission or offer of employment).
- Offer or receive, directly or indirectly, gifts, entertainment, sponsored travel or any other benefit that could affect, or be perceived to affect, the outcome of business transactions that are not legitimately due.
- Make a donation as a way of obtaining or retaining an advantage for the benefit of ANZ or any other person.
- Enter into, or continue, a business relationship (with, for example; employees, suppliers, third party agents, intermediaries, joint venture partners or proposed merger and acquisition targets) without appropriate due diligence being conducted and if it cannot be satisfied that the entity or individual will behave in a manner consistent with the policy.
- Keep inaccurate books and records or keep accounts or transactions relating to dealings with third parties "off-book" to facilitate or conceal improper payments.

Role of Compliance

Compliance will:

- Provide leadership, guidance, training, advice and direction to promote compliance with the policy.
- Ensure effective reporting, escalation and resolution of bribery and corruption compliance issues.