



Guy Boyd
**Head of Financial Crime/
Group Money Laundering Reporting Officer (MLRO)
Compliance**

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To whom it may concern

1 June 2017

Dear Sir/Madam,

Anti-Money Laundering Questionnaire

We enclose a copy of Australia and New Zealand Banking Group Limited's (ANZ) current Anti-Money Laundering Questionnaire for your information. The questionnaire applies to ANZ, its branches and controlled entities as set out in ANZ's USA Patriot Act Certificate.

This letter provides additional general information relevant to ANZ's anti-money laundering (AML) and counter-terrorism financing (CTF) compliance.

ANZ is a publicly listed company, and was incorporated on 14 July 1977 in Australia. ANZ is the main holding and operating company for the ANZ Group and our registered office is ANZ Centre, Level 9, 833 Collins Street, Docklands, Victoria, Australia. ANZ shares and related securities are listed on the Australian and New Zealand exchanges.

ANZ's principal prudential regulator is the Australian Prudential Regulation Authority (APRA). The Australian Transaction Reports and Analysis Centre (AUSTRAC) has responsibility for enforcing Australian AML and CTF laws. ANZ's operations in offshore jurisdictions are also subject to local regulatory oversight including in relation to AML and CTF obligations.

ANZ's website, www.anz.com, and the Bankers Almanac Due Diligence Repository (available at www.bankersacuity.com) are the recommended sources for obtaining additional up-to-date information about ANZ, including the following:

- Names of current board members and management team;
- Corporate governance matters;
- Details about ANZ's corporate structure and business operations; and
- Copies of relevant documents, including ANZ's Global Patriot Act Certificate and a copy of ANZ's most recent Annual Report.

If you have any further inquiries relating to ANZ's Anti-Money Laundering Questionnaire, please contact CGT@anz.com.

Yours faithfully,

Guy Boyd
Head of Financial Crime/Group MLRO

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Financial Institution Name (FI):	Australia and New Zealand Banking Group Limited ("ANZ")
Location:	833 Collins Street, Docklands, Victoria, 3008, Australia
Application:	This questionnaire applies to ANZ, its branches and controlled entities as set out in ANZ's USA Patriot Act Certificate.
Contact Details	CGT@anz.com

Anti-Money Laundering Questionnaire

Additional information has been supplied at the end of the questionnaire where a 'no' response is indicated.

I. General AML Policies, Practices and Procedures

1.	Is the AML compliance program approved by the FI's board or a senior committee on an annual basis?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2.	Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
3.	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
4.	In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
5.	Does the FI have a policy prohibiting accounts/relationships with shell banks? (<i>A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group</i>).	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
6.	Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
7.	Does the FI have a policy prohibiting payable-through accounts i.e. correspondent accounts that are used directly by third parties to transact business on their own behalf?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
8.	Does the FI have policies covering relationships with Politically Exposed Persons (PEPs), their family and close associates?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
9.	Does the FI have record retention procedures that comply with applicable law?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
10.	Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the jurisdiction?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

II. Risk Assessment

11.	Does the FI have a risk-based assessment of its customer base and their transactions?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
12.	Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

13.	During the past five years, has the FI, its parent or any subsidiary:	
a)	Experienced any regulatory investigation, prosecution, civil penalty relating to your anti-money laundering or counter-terrorist financing compliance?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
b)	Entered into any binding undertaking or consented to any court order to rectify your anti-money laundering or counter-terrorist financing compliance?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

III. Know Your Customer, Due Diligence and Enhanced Due Diligence

14.	Has the FI implemented processes for the identification and of those customers on whose behalf it maintains or operates accounts or conducts transactions? Is this information verified from reliable and independent sources?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
15.	Does the FI have a requirement to collect information regarding its customers' business activities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
16.	Does the FI assess its FI customers' AML policies or practices?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
17.	Does the FI have a process to review and, where appropriate, update customer information relating to high-risk client information?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
18.	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
19.	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds

20.	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
21.	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
22.	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
23.	Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
24.	Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats? ¹	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

¹ The four payment message standards to be observed are: i) FIs should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; ii) FIs should not use any particular payment message for the purpose of avoiding detection of information by any other FI in the payment process; iii) Subject to applicable laws, FIs should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; and (iv) FIs should strongly encourage their correspondent banks to observe these principles. Source: [http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_\(2007\).pdf](http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_(2007).pdf)

V. Transaction Monitoring		
25.	Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as traveller's checks, money orders, etc.?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
VI. AML Training		
26.	Does the FI provide AML training to relevant employees that includes: - Identification and reporting of transactions that must be reported to government authorities. - Examples of different forms of money laundering involving the FI's products and services. - Internal policies to prevent money laundering.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
27.	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
28.	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
29.	Does the FI employ third parties to carry out some of the functions of the FI?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
30.	If the answer to question 29 is yes, does the FI provide AML training to relevant third parties that includes: - Identification and reporting of transactions that must be reported to government authorities. - Examples of different forms of money laundering involving the FI's products and services. - Internal policies to prevent money laundering.	Yes <input type="checkbox"/> No* <input checked="" type="checkbox"/> * Refer below

Space for additional information (Please indicate which question the information is referring to.)

Question 30 - To the extent applicable, ANZ undertakes an assessment of the AML/CTF program of the relevant third party prior to the agreement with the third party being entered into. Third party arrangements include a contractual right to review any obligations completed by the third party on behalf of ANZ.

FATCA Compliance – A comprehensive list of the FI GIIN's can be found at ANZ website.

- Link to the site: www.anz.com.au/;
- Search for GIIN.

For further information in relation to any of the contents of this questionnaire, please contact us at CGT@anz.com

Name: Guy Boyd

Title: Head of Financial Crime and Group Money Laundering Reporting Officer (MLRO)

Signature: _____

Date: 01 June 2017