



## Group Sanctions Approach

With operations in many jurisdictions, ANZ must comply with all applicable laws in all the jurisdictions in which it operates, including requirements of supra-national organisations, such as the United Nations and European Union and other related regulatory requirements, whether as a matter of law or ANZ policy. Sanctions laws prohibit or restrict ANZ from engaging in activity that involves sanctioned persons, prohibited activity or certain jurisdictions. Depending on the particular sanctions, ANZ may be required to freeze assets, reject transaction, not extend credit or provide services, or take other specific actions. This summary sets out ANZ's approach to meeting our sanctions compliance obligations. The implementation is supported by policy documents and mandatory training.

### KEY SANCTIONS OBLIGATIONS

ANZ:

- has implemented a risk-based preventive approach, using practises that identify, manage, and mitigate sanctions risk in all jurisdictions of ANZ representation.
- reserves the right not to process transactions involving certain jurisdictions, products, or services; for ANZ policy or risk appetite reasons.
- except in limited and pre-approved circumstances does not enter, or remain involved in, transactions that have any connection directly or indirectly with Cuba, Iran, North Korea, Syria, or the Occupied Territories of Crimea, Donetsk, and Luhansk, including any transactions initiated from these jurisdictions.
- except in limited and pre-approved circumstances does not enter, or remain involved in, commercial transactions that have any connection directly or indirectly with Belarus, Russia or the Disputed Territories of Kherson or Zaporizhzhia.
- except in limited and pre-approved circumstances does not enter, or remain involved in, transactions that have any connection with some sectors of the economy (e.g., the Energy Sector (Oil, Gas, Petrochemical), Telecommunications, Information Technology and Software, Defence, Intelligence and Security and Aerospace sectors) in some jurisdictions e.g., Venezuela. Other sectors and jurisdictions may be relevant. If in doubt, please discuss with your ANZ representative.
- does not enter, or remain involved in, a transaction or relationship that directly or indirectly involves a sanctioned party or product.
- conducts customer identification and verification activities in proportion to the sanctions risk posed by that customer or product.
- monitors customers for evidence of suspicious activity and reports such activity where it suspects a person may be acting illegally.
- files all reports it deems appropriate with the sanctions regulators in jurisdictions of ANZ representation.
- ensures that third parties acting for ANZ comply with the Group Sanctions Policy.
- retains all records that may be relevant for a minimum of 7 years.

ANZ customers must ensure that none of their investments, services, goods or trade involving sanctioned persons, prohibited activity or jurisdictions are sent to or processed through ANZ, or are funded or otherwise facilitated by financing provided by ANZ. ANZ will take appropriate action, including potentially blocking (ie freezing) or rejecting funds, with respect to transactions that appear to violate applicable sanctions.

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