ANZ GROUP SLAVERY AND HUMAN TRAFFICKING STATEMENT

BACKGROUND

In accordance with the requirements of Section 54 of the Modern Slavery Act 2015 (UK) this statement sets out the steps that ANZ Group has taken in relation to our responsibilities to mitigate the risk of slavery, servitude and forced or compulsory labour and human trafficking, within our businesses or our supply chain in the financial year ending 30 September 2018 and is our third statement.

ABOUT ANZ

ANZ Group provides banking and financial products and services to individual and business customers. Australia and New Zealand Banking Group Limited (ANZ) is the parent of ANZ Group and is listed on the Australian and New Zealand stock exchanges. We operate in 34 markets internationally, including the United Kingdom. Our business is made up of various, related legal entities, which in combination employ 40,000 employees worldwide with approximately 250 in the United Kingdom.

Our Purpose is to shape a world where people and communities thrive. That is why we strive to create a balanced, sustainable economy in which everyone can take part and build a better life.

ANZ is a signatory to the <u>United Nations Global Compact</u>, which encourages businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. Two of the principles specifically relate to slavery and human trafficking: Principle 4 - the elimination of all forms of forced and compulsory labour and Principle 5 - the effective abolition of child labour.

ANZ Group also utilises the UN Guiding Principles on Business and Human Rights to inform our approach to human rights issues and to assist us in preventing and addressing the risk of adverse human rights impacts that might otherwise arise in relation to ANZ's business activity.

OUR BUSINESS

Our values of Integrity, Collaboration, Accountability, Respect and Excellence guide our interactions with all our stakeholders, including our employees. We have in place a number of policies and procedures to protect the human rights of staff and contractors, including providing protection against human trafficking and slavery.

These include <u>Respecting People and Communities: ANZ's Approach to Human Rights</u>. These standards reflect our ethics and values, providing guidance on the way we treat our employees, work with our customers, suppliers and other business partners and contribute to the communities in which we operate. The standards apply in all markets in which we operate.

SUPPLY CHAIN

We procure goods and services in the 34 markets in which we operate with key areas of spend including technology, property and people-related services each of which may have potential exposure to slavery impacts.

ANZ Group has a central Purchasing Policy, which in addition to commercial considerations, also addresses the mitigation of risk, compliance with regulatory requirements and guidelines and the requirement to act and be seen to act fairly, ethically and responsibly.

ANZ Group has continued to take a number of steps to address the risks of slavery and human trafficking within our supply chain, as set out below.

SUPPLIER CODE OF PRACTICE

ANZ Group's <u>Supplier Code of Practice</u> (SCOP) outlines our minimum requirements for suppliers in relation to governance and general compliance, workplace relations, occupational health and safety, ethical business practices and environmental management. It includes a number of commitments in relation to human rights, including that the supplier will not tolerate forced or child labour and will compensate employees in compliance with wage laws. During the 2016-2017 financial year, ANZ revised the SCOP enhancing its slavery and human trafficking protections to cover trafficking and the inhumane treatment and abuse of workers. The SCOP aligns with ANZ's <u>Code of Conduct and Ethics</u>. It is also based on the <u>OECD Guidelines for Multinational Enterprises</u> and the UN Global Compact.

The SCOP reflects our commitment to working with our supply chain to better understand and minimise the social and environmental impact of our mutual business operations.



THE SCOP IN PRACTICE

We have introduced a supplier screening program for reputational risk which uses a framework of risk themes including social, governance and environmental risks. In excess of 4,000 checks were undertaken during 2018. Allegations of poor labour relations in China over a decade ago were identified as a result of one of these checks on a proposed new supplier. Upon investigation with the supplier, ANZ's concerns were allayed as the supplier had acted quickly at the time to take action and employed best practice quidelines in managing subcontractors.

During 2018, this reputational risk screening program is being extended to include sub-contractors in ANZ's supply chain.

For suppliers that are actively managed at ANZ Group level, an annual attestation to adherence to the SCOP is sought. In addition, a program seeking attestations from suppliers considered to be at high risk of impacting human rights, with specific focus on suppliers located in those countries where ANZ believes there is potentially a greater level of risk, has been implemented.

CUSTOMER RELATIONSHIPS

We understand the impact that our customers can have on society and the environment through our financing and we expect our customers to identify, manage, monitor and redress any adverse impacts on human rights with which their business is involved, in line with international standards.

We conduct social and environmental screenings in line with our policies applying to our corporate customers, which include an assessment of their human rights performance. If prospective or existing customers do not meet our standards and are not willing to adapt their practices in an appropriate timeframe, we may decline financing or exit the relationship.

TRAINING

Group Procurement mandates Modern Slavery training for all its sourcing staff. This training includes; what modern slavery looks like, its impact on individuals, companies and society, the background to the Act, what ANZ is doing in response to the Act, how this will impact our supply chain and what staff can do to minimise the potential risks.

During 2018, a video was created and released to our Institutional Banking staff to assist in educating them about human trafficking risks and issues what staff can do if they suspect any customers are involved in human trafficking.

WHISTLEBLOWER SCHEME

ANZ has a Whistleblower Protection Policy which promotes honest and ethical behaviour by providing a framework for the escalation of reportable conduct. This policy applies to employees and contractors of ANZ, including third party vendors and service providers. A disclosure may be made to an independent third party via ANZ's external whistleblower reporting service which is managed by Deloitte. There were no instances of concerns relating to modern slavery raised in the 2017- 2018 financial year.

This statement has been endorsed by the Board of the ANZ Group and will be reviewed and updated annually.

Signed on behalf of ANZ Group by:

Shayne Elliott

Chief Executive Officer, ANZ

Dated 22 November 2018