



## **Anti-Money Laundering and Counter-Terrorism Financing Policy Summary**

### **Why does ANZ have this policy?**

This policy sets out ANZ's approach to detection and deterrence of money laundering and terrorism financing activities which use, or seek to use, ANZ products or services.

This is one of the global policies supporting ANZ's Code of Conduct and Ethics.

### **How does this policy apply at ANZ?**

This policy applies to all employees and contractors of Australia and New Zealand Banking Group Limited and its controlled entities.

The implementation of this policy is supported by global procedures and all employees and contractors complete mandatory training, repeated every year.

Breaches of this policy may lead to disciplinary action, including dismissal, as well as criminal, civil or regulatory consequences.

### **Key obligations**

Under this policy ANZ will:

- implement a risk-based preventive approach, using practices that identify, manage and mitigate money laundering and terrorism financing risk
- conduct customer identification and verification activities in proportion to the money laundering and terrorism financing risk posed by that customer
- monitor customers for evidence of suspicious activity, and report such activity where it suspects a person may be acting illegally
- file all reports required by the relevant anti-money laundering regulators
- ensure that third parties acting for ANZ comply with this policy
- retain all records that may be relevant to anti-money laundering and counter-terrorism financing activities at ANZ for a minimum of 7 years.

### **Role of Group Compliance**

Group Compliance will:

- provide leadership, guidance, advice and direction to promote compliance with the policy
- ensure effective reporting, escalation and resolution of anti-money laundering and counter-terrorism financing compliance issues.

Last review: August 2013

Reviewed annually by: Group Compliance