



Fraud Policy Summary

Why does ANZ have this policy?

Fraud is an intentional act using deception to obtain an unjust or illegal advantage, and may arise from internal or external sources.

The purpose of this policy is to set out ANZ's approach to proactively minimise the occurrence of fraud and its consequences to our customers, shareholders and employees and to meet legal and regulatory requirements.

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 liability.

Key obligations

Under this policy ANZ will:

- maintain preventive and detective systems, controls and strategies to protect its customers, shareholders and employees against the risks of fraud
- identify, assess, document and control fraud risks associated with all activities, including products, processes and delivery channels
- conduct appropriate screening of prospective employees and contractors
- refer internal fraud matters to the police.

Under this policy employees and contractors will:

- act with honesty and integrity
- understand the importance of, and implement, fraud prevention activities, such as customer identification checks
- understand fraud risks and be alert to any fraudulent activity
- immediately report any actual or suspected fraud in accordance with ANZ's fraud reporting requirements.

Last reviewed: October 2013

Reviewed annually by: Group Risk