



Conflict of Interest Policy Summary

Why does ANZ have this policy?

This policy provides a globally consistent approach to identification and management of conflict of interest at ANZ. A conflict of interest - actual, potential or perceived - arises where the duties or interests of a person or entity are not aligned with that person or entity's obligations to others.

How does this policy apply at ANZ?

This policy applies to all employees, contractors and Responsible Persons (as defined by APRA*) of Australia and New Zealand Banking Group Limited and its controlled entities.

The implementation of this policy is supported by global procedures and processes, and all employees and contractors complete mandatory annual training.

Breaches of this policy may lead to disciplinary action, including dismissal, and may also contravene insider trading or other laws, for which financial penalties and/or imprisonment may apply.

Key obligations

Under this policy employees, contractors and Responsible Persons will:

- identify conflicts of interest, for which ANZ will either remove the cause, or manage through a combination of controls and disclosures
- when representing ANZ, declare their interests where they see an actual or potential conflict of interest or a possible perception of a conflict of their personal interests with ANZ, ANZ customers, ANZ suppliers or any other persons involved in their ANZ business activities
- not be involved in, and will exclude themselves from, ANZ business decisions which impact on their family members or associated entities
- not disclose or pass on to any other person inside information, unless there is a legitimate ANZ business reason
- not trade, or advise, procure or encourage another person to trade in securities when they possess inside information in relation to those securities
- not be involved in the creation or maintenance of an artificial price for, or the dissemination of information which could have a false or misleading impact on the price of, securities
- obtain ANZ's prior written consent before engaging in any outside employment or role that has the potential to create an actual, potential or perceived conflict of interest.

Last reviewed: November 2013

Reviewed annually by: Group Compliance

*Australian Prudential Regulation Authority: Prudential Standard CPS 520 - Fit and Proper Responsible Persons includes directors and senior managers