



Code of Conduct

Why it matters

- 1) ANZ's Purpose is to shape a world where people and communities thrive. Our people and communities expect us to do the right thing and to exercise good judgement.
- 2) Our Code of Conduct (Code) describes how we work at ANZ and sets expected standards of behaviour consistent with our Purpose. The Code supports our Values of Integrity, Collaboration, Accountability, Respect and Excellence and helps us to make fair, balanced and ethical decisions in our day-to-day work.

When this applies

- 3) The Code applies to:
 - a. Users: employees and contingent workers
 - b. Entities: the ANZ Group
 - c. Activities: the performance of our daily roles and other work-related activities.

The Code

We are ethical and professional

- 4) This means that we:
 - a. are trustworthy and create confidence and goodwill with customers
 - b. always put the interests and needs of customers first when providing advice on products and services
 - c. undertake our duties with care and diligence and always consider the risks to our customers, communities and ANZ
 - d. help protect ANZ, its customers and our community against financial crimes including fraud, tax evasion, money laundering, terrorist financing or breaches of economic sanctions
 - e. never engage in anticompetitive conduct
 - f. behave professionally and appropriately at work- and work-related functions
 - g. only provide advice to customers that we are qualified and authorised to provide
 - h. never engage in conduct (including outside of work) that may cause damage to ANZ's reputation or is incompatible with our employment at ANZ. This includes communications or statements on social media or in other forums.

We act with integrity

- 5) This means that we:
 - a. are honest and transparent in our dealings with others

- b. never act illegally or conceal breaches of the law or our Code (or help anyone else to do so)
- c. use ANZ technology, systems, assets, information and funds appropriately and for approved purposes
- d. ensure any expenditure is allowable and reasonable (and if you are a people leader ensure that you appropriately monitor the discretionary expenses of your team).

We treat all people with dignity and respect

- 6) This means that we:
- a. treat customers, colleagues, suppliers and other stakeholders with respect and dignity
 - b. value diversity and difference and never harass, bully or unlawfully discriminate
 - c. make employment decisions based on merit
 - d. create a safe working environment. If we see something – we do something.

We protect privacy and confidentiality

- 7) This means that we:
- a. only collect, access, use and disclose confidential or personal information for legitimate business purposes, where authorised, or as required by law
 - b. don't access or view any customer accounts (including those of friends or relatives) unless it is necessary for legitimate business purposes
 - c. only provide confidential or personal information to other employees where it is required for work purposes
 - d. never allow others to log on to ANZ systems using our personal credentials
 - e. always follow ANZ's information handling and security procedures.

We comply with our Code, the law and ANZ policies and procedures

- 8) This means that we:
- a. know and comply with all laws, policies (including policy requirements and standards) and procedures that apply to our roles
 - b. complete all mandatory training as directed by ANZ
 - c. seek guidance if unsure whether or how a particular law, policy or procedure applies
 - d. immediately disclose any criminal charges or convictions to line management.

We call out unacceptable behaviour and stand up for what is right

- 9) This means that we:
- a. immediately report any unacceptable, dishonest, or unethical behaviour by others (including colleagues, customers, or suppliers)

- b. make sure people feel safe to speak up, encourage them to do so and don't victimise anyone who does
- c. report suspected breaches and concerns to your people leader, People Assist, Operational Risk and Compliance or to a Whistleblower Protection Officer. If we see something – we say something

Overview of Code documents

10) More information about some of your key obligations can be found in the following policies:

Artefact	Summary
Anti-Bribery and Anti-Corruption Business Integrity Policy	Reinforces ANZ's commitment to doing business with integrity and to refrain from bribery and corruption in all its business dealings
Anti-Money Laundering and Counter-Terrorism Financing Policy	Guides and directs ANZ's approach to the detection and deterrence of money laundering and terrorism financing activities
Competition Policy	Seeks to ensure that competition risks within ANZ's business continue to be properly identified, mitigated, and managed
Conflicts of Interest Policy	Provides a globally consistent approach to the identification and management of conflicts of interest
Customer Tax Transparency Policy	Guides and directs ANZ's approach to meet its obligations under various customer-focused tax transparency laws
Data Management Policy	Requirements for the management, accountability, protection and use of data across its lifecycle
Equal Opportunity, Bullying and Harassment Policy	Sets out standards of behaviour that employees must follow and provides guidance on how to identify, report and help prevent unacceptable behaviour at ANZ
Expense, Travel and Entertainment Policy	Guidance when for incurring, approving and monitoring business expenses for travel, entertainment, events and other purposes
Fraud Policy	Provides a globally consistent understanding of fraud across ANZ and outlines each person's responsibilities to prevent and detect fraud and how to report suspected or actual fraud
Information Security Policy	Protects ANZ information assets and meets regulatory and industry requirements by mandating a framework of information security controls, management and governance
Privacy Policy	Addresses the ways ANZ protects information privacy and describes the mechanisms in place for ensuring that personal information in our custody or control is handled in a way that is both compliant and ethical
Trading in ANZ Securities Policy	Puts in place systems and processes aimed at preventing insider trading, reinforces culture to avoid reputational damage to ANZ, and upholds the Code of Conduct to maintain the trust of customers
Trading in non-ANZ Securities Policy	Puts in place systems and processes aimed at preventing insider trading, reinforces culture to avoid reputational damage to ANZ, and upholds the Code of Conduct to maintain the trust of customers

Artefact	Summary
Use of Systems, Equipment and Information Policy	Provides guidance on the appropriate use of ANZ systems, equipment, information and social media, including ANZ systems operating on or which store ANZ data outside of the ANZ Group
Wellbeing and Safety Policy	Supports ANZ's Wellbeing and Safety Management System, reinforces ANZ's commitment to eliminating or minimising health and safety risk from ANZ activities, and highlights the importance of ANZ's employee wellbeing programs
Whistleblower Policy	Explains how to report concerns relating to misconduct, the protections that will apply, how concerns will be investigated and what to expect

Code governance

- 11) We treat breaches seriously because we want to build an organisation we can all be proud of. Reported breaches of the Code will be investigated and if substantiated will result in action being taken, which can include formal warnings or termination of employment. No one wants to see that happen, so please treat our Code seriously.
- 12) This Code satisfies Recommendation 3.2 of the ASX Corporate Governance Principles and Recommendations (4th Edition).

Responsibilities

Role	Responsibilities
Employees	<ul style="list-style-type: none"> • Apply the Code to ourselves and those who work alongside us (contractors and consultants) • Understand our Code in letter and spirit
People leaders or someone who manages, supervises, or directs the work of others	<ul style="list-style-type: none"> • Lead in accordance with ANZ's purpose and our "New Ways of Leading" behaviours • Role model the behaviour we expect under the Code and our Values • Set clear expectations for your team about the standards of behaviour required under the Code and the potential consequences of unacceptable behaviour • Accountable for ensuring that the actions and decisions of your team are consistent with the Code and ANZ's Values • Promote speaking up and ensure that your people feel safe to raise any issues or concerns • Identify any breaches of the Code and address these in accordance with ANZ policies and processes

Definitions

- 13) The [Policy Glossary](#) contains standard terms.

Document information

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