2025

Half Year U.S. Disclosure Document

for the half year ended 31 March 2025

Australia and New Zealand Banking Group Limited ABN 11 005 357 522

The date of this 2025 Half Year U.S. Disclosure Document is 16 May 2025

U.S. Disclosure Document
Half year ended 31 March 2025

CONTENTS **PAGE**

INTRODUCTION	**1**
SECTION 1: KEY INFORMATION	**2**
Forward-looking statements	
Basis of preparation	
Summary of unaudited condensed consolidated income statements and selected ratios	
Summary of unaudited condensed consolidated balance sheets and selected ratios	
Summary of credit risk data	
SECTION 2: INFORMATION ON THE GROUP	**7**
Overview	
Business model	
Strategy	
Principal activities	
Recent developments	
Competition	
Supervision and regulation	
Risk factors	
Currency of presentation and exchange rates	
SECTION 3: OPERATING AND FINANCIAL REVIEW AND PROSPECTS	**43**
Operating and financial review	
Condensed consolidated income statement information	
Analysis of major income and expense items	
Condensed consolidated balance sheet information	
Results by division	
Liquidity and capital resources	
SECTION 4: DIRECTORS, SENIOR MANAGEMENT/EXECUTIVES AND EMPLOYEES	**76**
SECTION 5: ADDITIONAL INFORMATION	**77**
Inspection of documents	
Organisational structure	
Dividend distribution policy	
Related party transactions	
Change in control	
Legal proceedings	
Exchange controls and restrictions on payments	
Material contracts	
Cybersecurity risk management	
GLOSSARY OF CERTAIN FINANCIAL TERMS	**82**
ANNEX: CONDENSED CONSOLIDATED FINANCIAL STATEMENTS OF THE GROUP FOR THE HALF YEAR ENDED 31 MARCH 2025 AND INDEPENDENT AUDITOR'S REVIEW REPORT ON THE CONDENSED CONSOLIDATED FINANCIAL STATEMENTS	**84**

All references in this document to the “U.S. Disclosure Document” refer to the 2025 Half Year U.S. Disclosure Document of Australia and New Zealand Banking Group Limited for the half year ended 31 March 2025 (the “March 2025 half” or “Mar 25” or “Mar 25 half” or “current period”), including the Annex attached hereto. References to the “September 2024 half” refer to the half year ended 30 September 2024 (the “September 2024 half” or “Sep 24” or “Sep 24 half”) and references to the “March 2024 half” refer to the half year ended 31 March 2024 (the “March 2024 half” or “Mar 24” or “Mar 24 half”), and we refer to prior half years in a similar fashion. References in this document to the “2024 Annual U.S. Disclosure Document” refer to the 2024 Annual U.S. Disclosure Document for the year ended 30 September 2024.

This U.S. Disclosure Document is dated 16 May 2025. All references in this document to “the date of this U.S. Disclosure Document” are to 16 May 2025.

The following references in this U.S. Disclosure Document are defined as below:

- “Group”, “we” and “our” means Australia and New Zealand Banking Group Limited and each of its subsidiaries.
- “ANZBGL” or “the Company” means Australia and New Zealand Banking Group Limited.
- “ANZGHL” means ANZ Group Holdings Limited, a non-operating holding company listed on the ASX and the ultimate parent entity of ANZBGL.
- “ANZ Group” means (i) prior to 3 January 2023, ANZBGL and each of its subsidiaries, and (ii) on or after 3 January 2023 ANZGHL and each of its subsidiaries.

Information contained in or accessible through any website referred to in this U.S. Disclosure Document does not form part of this document unless we specifically state that it is incorporated by reference and forms part of this U.S. Disclosure Document. All references in this document to websites are inactive textual references and are not active links.

This U.S. Disclosure Document has been prepared in order to provide U.S. investors with certain information regarding the Group’s business and operations, as well as its financial position, as at 31 March 2025, and the results of operations for the half year then ended. Except to the extent stated herein, all financial information disclosed in this U.S. Disclosure Document relates to the Group.

Attached to this U.S. Disclosure Document as the Annex are the following documents that have been filed with the Australian Securities Exchange (“ASX”) in accordance with its rules:

- The Group‘s Condensed Consolidated Financial Statements for the half year ended 31 March 2025 (comprising the financial statements, notes to the financial statements and directors’ declaration) (hereafter referred to as the “Condensed Consolidated Financial Statements”); and
- The independent auditor’s review report on the Group’s Condensed Consolidated Financial Statements.

FORWARD-LOOKING STATEMENTS

This U.S. Disclosure Document may contain forward-looking statements or opinions including statements and opinions regarding the Group's intent, belief or current expectations with respect to the Group's business operations, market conditions, results of operations and financial condition, capital adequacy, sustainability objectives or targets, specific provisions and management practices and transactions that the Group is undertaking or may undertake. Those matters are subject to risks and uncertainties that could cause the actual results and financial position of the Group to differ materially from the information presented herein. When used in this U.S. Disclosure Document, the words "forecast", "estimate", "goal", "target", "indicator", "plan", "pathway", "ambition", "modelling", "project", "intend", "anticipate", "believe", "expect", "may", "probability", "risk", "will", "seek", "would", "could", "should" and similar expressions, as they relate to the Group and its management, are intended to identify forward-looking statements or opinions. Those statements and opinions: are usually predictive in character; or may be affected by inaccurate assumptions or unknown risks and uncertainties; or may differ materially from results ultimately achieved. As such, these statements and opinions should not be relied upon when making investment decisions, particularly in circumstances of economic and market volatility. There can be no assurance that actual outcomes will not differ materially from any forward-looking statements or opinions contained herein. For further discussion, including regarding certain factors that will affect the forward-looking statements or opinions contained herein, refer to "Risk Factors Summary" below and "Risk Factors" in "Section 2: Information on the Group".

These statements and opinions only speak as at the date of publication and no representation is made as to their correctness on or after this date. The Group does not undertake any obligation to publicly release the result of any revisions to these forward-looking statements to reflect events or circumstances after the date of this U.S. Disclosure Document or to reflect the occurrence of unanticipated events.

RISK FACTORS SUMMARY

Risks to the Group's activities that can adversely impact its business, business model, operations, results of operations, reputation, prospects, liquidity, capital resources, financial performance and financial condition (together, the "Group's Position"), which the Group believes are material are summarised below and described under "Risk Factors" in "Section 2: Information on the Group" of this U.S. Disclosure Document. These risks include, but are not limited to, the following:

- changes in political and economic conditions, particularly in Australia, New Zealand, the Asia Pacific region, the United Kingdom ("UK"), Europe and the United States ("U.S.");
- competition in the markets in which the Group operates;
- the Group's ability to complete, integrate or separate and process acquisitions and divestments;
- changes in the real estate markets in Australia, New Zealand or other markets where the Group does business;
- sovereign risk events that may destabilise global financial markets;
- market risk events;
- changes in exchange rates;
- pandemics and other public health crises;
- the Restructure of the Group that established a non-operating holding company;
- credit risk;
- challenges in managing the Group's capital base;
- changes to the Group's credit ratings;
- liquidity and funding risk events;
- changes in the valuation of some of the Group's assets and liabilities;
- changes to the Group's accounting policies;
- regulatory changes or a failure to comply with laws, regulations or policies;
- litigation and contingent liabilities;
- significant fines and sanctions in the event of breaches of law or regulation relating to anti-money laundering, counter-terrorism financing, sanctions and scams;
- changes in monetary policies;
- the impact of ongoing significant compliance costs with respect to the evolving and extensive Automatic Exchange of Information obligations imposed by global customer tax transparency regimes;
- unexpected changes to the Group's licence to operate in any jurisdiction;
- the impact of future weather events, nature loss, human rights, geological events, plant, animal and human diseases, and other extrinsic events;
- risks associated with lending to customers that could be directly or indirectly impacted by climate risk;
- the effectiveness of the Group's risk management framework;
- non-financial risk events;
- conduct risk events;
- human capital risk relating to the inability to attract, develop, motivate and retain the Group's people to meet current and future business needs;
- reputational risk events, including as a result of operational failures and regulatory compliance failures;
- disruption of information technology systems or failure to successfully implement new technology systems;
- risk associated with the Group's information security including from cyber-attacks;
- risk associated with data management;
- risk associated with the models that the Group relies on for material business decisions;
- risks associated with use of artificial intelligence ("AI"); and
- various other factors beyond the Group's control.

BASIS OF PREPARATION

The summary of the condensed consolidated income statements and selected ratios for the half years ended 31 March 2025, 30 September 2024 and 31 March 2024, and the summary of the condensed consolidated balance sheets and selected ratios as at 31 March 2025, 30 September 2024, and 31 March 2024, have been derived from the Condensed Consolidated Financial Statements and management schedules. The Condensed Consolidated Financial Statements are attached to this U.S. Disclosure Document as the Annex. The Condensed Consolidated Financial Statements and the financial information included herein, except where otherwise noted, have been prepared in accordance with the recognition and measurement requirements of Australian Accounting Standards (“AASs”), issued by the Australian Accounting Standards Board (“AASB”), AASB 134 *Interim Financial Reporting* (“AASB 134”) and the *Corporations Act 2001* of Australia (the “Corporations Act”). International Financial Reporting Standards (“IFRS”) are standards and interpretations issued by the International Accounting Standards Board (“IASB”). IFRS forms the basis of AASs. The Condensed Consolidated Financial Statements and the financial information included herein comply with the recognition and measurement requirements of IFRS and International Accounting Standard 34 *Interim Financial Reporting* issued by the IASB. For further information concerning the basis of preparation of the Condensed Consolidated Financial Statements, refer to Note 1 of the Condensed Consolidated Financial Statements. Unless otherwise stated herein, all financial information disclosed in this U.S. Disclosure Document relates to the Group.

Amounts in this U.S. Disclosure Document are presented in Australian Dollars (“$”, “AUD” or “A$”) unless otherwise stated. Amounts reported in United States Dollars (“USD”, “US$” or “U.S. dollars”) have been translated at the 31 March 2025 Noon Buying Rate in New York City for cable transfers in Australian Dollars as certified for customs purposes by the Federal Reserve Bank of New York (the “Noon Buying Rate”), which was US$0.6236 = A$1.00. For further information on the currency of presentation in this U.S. Disclosure Document, refer to “Currency of presentation and exchange rates” in “Section 2: Information on the Group”. References to “NZD”, “EUR” and “JPY” in this U.S. Disclosure Document are to New Zealand dollars, Euros and Japanese Yen respectively. References throughout this U.S. Disclosure Document to “$B” and “$M” are to billions and millions of Australian Dollars (or, if specified, such other currency), respectively.

Suncorp Bank Acquisition

On 31 July 2024, the Group acquired 100% of the shares in SBGH Limited, the immediate holding company of Norfina Limited (formerly known as Suncorp-Metway Limited, and trading as Suncorp Bank (“Suncorp Bank”)).

During the March 2025 half, the Group progressed its purchase price allocation (“PPA”), to identify and measure the assets acquired and liabilities assumed at acquisition date. The adjustments to provisionally determined balances arising from the PPA exercise included the recognition of core deposit and brand intangible assets, fair value adjustments to gross loans and advances to reflect changes in interest rates and credit since loan origination, provisions for contingent liabilities and related indemnities and related deferred tax balances with a corresponding decrease to goodwill of $197 million. Refer to Note 18 of the Condensed Consolidated Financial Statements (attached to the U.S. Disclosure Document as part of the Annex) for further information. Prior periods have not been restated.

Suncorp Bank acquisition related adjustments

During the March 2025 half, the Group recognised an after-tax charge of $22 million for the following PPA related adjustments:

- Net interest income of $50 million ($35 million after tax) from unwinding of fair value adjustments recognised against loans and advances, deposits and debt issuance over the residual maturities of the underlying financial assets and liabilities. This was recognised in the Suncorp Bank division.
- Amortisation of acquired intangible assets of $82 million ($57 million after tax). The acquisition of Suncorp Bank resulted in the recognition of intangible assets of $685 million comprising core deposit and brand intangibles which are being amortised over their useful lives ranging between 3 to 6 years. This was not recognised in the Suncorp Bank division – refer to “Non-IFRS Financial Measures” below for further information.

During the September 2024 half, the Group recognised an after-tax charge of $196 million for the following acquisition related adjustments:

- Collectively assessed credit impairment charge of $244 million ($171 million after tax) for Suncorp Bank’s performing loans and advances. In accordance with *Australian Accounting Standards* requirements, the Group consolidated Suncorp Bank’s loans and advances on 31 July 2024, however the Group was not permitted to recognise an allowance for expected credit losses (ECL) on the performing loans and advances, leading to a proportional reduction in acquisition-related goodwill that would otherwise have been recognised. Subsequently, the Group was required to recognise a collectively assessed allowance for ECL estimated using the Group’s ECL methodologies, with a corresponding collectively assessed credit impairment charge recognised in the Group’s Income Statement. This was recognised in the Suncorp Bank division.
- Accelerated software amortisation expense of $36 million ($25 million after tax) on alignment to the Group’s software capitalisation policy. This was recognised in the Suncorp Bank division.

Non-IFRS Financial Measures

The Group measures the performance of operating segments on a cash profit basis, a non-IFRS measure which represents how the segments are managed internally. To calculate cash profit, the Group excludes items from profit after tax attributable to shareholders. The adjustments relate to the impacts of economic hedges and revenue and expense hedges, which represent timing differences that will reverse through earnings in the future, and the amortisation of intangible assets recognised as a result of the Suncorp Bank acquisition. Information presented on a cash basis should not be considered as an indication of, or as a substitute for, statutory measures of the financial performance of the operating segments. For further information, including a reconciliation of cash profit to profit after income tax, see “Section 3: Operating and Financial Review and Prospects – Results by Division”.

SUMMARY OF UNAUDITED CONDENSED CONSOLIDATED INCOME STATEMENTS AND SELECTED RATIOS

Condensed Consolidated Income Statement	Half Year			
	Mar 25 USD M[1]	Mar 25 $M	Sep 24 $M	Mar 24 $M
Interest income	**20,426**	**32,755**	30,846	29,832
Interest expense	**(14,915)**	**(23,917)**	(22,709)	(21,932)
Net interest income	**5,511**	**8,838**	8,137	7,900
Other operating income	**1,444**	**2,315**	2,236	2,248
Operating income	**6,955**	**11,153**	10,373	10,148
Operating expenses	**(3,609)**	**(5,788)**	(5,490)	(5,179)
Profit before credit impairment and income tax	**3,346**	**5,365**	4,883	4,969
Credit impairment (charge)/release[2]	**(89)**	**(143)**	(336)	(70)
Profit before income tax	**3,257**	**5,222**	4,547	4,899
Income tax expense	**(959)**	**(1,538)**	(1,381)	(1,435)
Profit for the year	**2,298**	**3,684**	3,166	3,464
Profit attributable to non-controlling interests	**(13)**	**(21)**	(21)	(14)
Profit attributable to shareholders of the Company	**2,285**	**3,663**	3,145	3,450

1. *The USD amounts are disclosed for information purposes only. There is no assurance that the AUD amounts could be translated at the 31 March 2025 Noon Buying Rate applied in this U.S. Disclosure Document.*
2. *The credit impairment (charge)/release represents the aggregation of the individually and collectively assessed credit impairment (charges)/releases.*

	Half Year			
	Mar 25 USD[1]	Mar 25	Sep 24	Mar 24
Selected ratios				
Other operating income as a percentage of operating income	**20.8%**	**20.8%**	21.6%	22.2%
Net interest margin (%)	**1.55%**	**1.55%**	1.58%	1.55%
Operating expense to operating income ratio (%)	**51.9%**	**51.9%**	52.9%	51.0%
Dividends paid on ordinary shares ($M)	**1,542**	**2,472**	2,496	2,771

1. *The USD amounts are disclosed for information purposes only. There is no assurance that the AUD amounts could be translated at the 31 March 2025 Noon Buying Rate applied in this U.S. Disclosure Document.*

SUMMARY OF UNAUDITED CONDENSED CONSOLIDATED BALANCE SHEETS AND SELECTED RATIOS

	As at			
	Mar 25 USD M[1]	Mar 25 $M	Sep 24 $M	Mar 24 $M
Share capital and reserves attributable to shareholders of the Company	**43,620**	**69,948**	67,989	69,434
Subordinated debt[2]	**26,737**	**42,876**	39,665	36,346
Unsubordinated debt	**78,997**	**126,679**	116,723	90,763
Deposits and other borrowings	**607,156**	**973,630**	905,166	807,189
Gross loans and advances	**514,229**	**824,613**	807,707	719,310
Less: Individually assessed provision for credit impairment	**(216)**	**(346)**	(303)	(320)
Less: Collectively assessed provision for credit impairment	**(2,130)**	**(3,415)**	(3,372)	(3,169)
Net loans and advances	**511,883**	**820,852**	804,032	715,821
Total assets	**812,533**	**1,302,971**	1,229,585	1,090,138
Net assets	**44,096**	**70,712**	68,760	70,202
Risk weighted assets	**292,468**	**468,999**	446,582	432,779
Capital adequacy ratios (Level 2):				
Common Equity Tier 1	**11.8%**	**11.8%**	12.2%	13.5%
Tier 1	**13.4%**	**13.4%**	14.0%	15.4%
Tier 2	**7.0%**	**7.0%**	6.5%	6.5%
Total capital ratio	**20.4%**	**20.4%**	20.6%	21.9%

	Half Year			
	Mar 25 USD[1]	Mar 25	Sep 24	Mar 24
Selected ratios				
Profit attributable to the shareholders of the Company as a percentage of:				
Average total assets[3]	**0.6%**	**0.6%**	0.5%	0.6%
Average ordinary shareholders' equity excluding non-controlling interests[3]	**10.7%**	**10.7%**	9.4%	9.9%
Average ordinary shareholders' equity excluding non-controlling interests as a percentage of average total assets[3]	**5.2%**	**5.2%**	5.7%	6.0%

1. *The USD amounts are disclosed for information purposes only. There is no assurance that the AUD amounts could be translated at the 31 March 2025 Noon Buying Rate applied in this U.S. Disclosure Document.*
2. *For the composition of subordinated debt, refer to Note 10 in the Condensed Consolidated Financial Statement (attached to this U.S. Disclosure Document as part of the Annex).*
3. *Averages are calculated using predominantly daily averages.*

SUMMARY OF CREDIT RISK DATA

	As at			
	Mar 25 USD M[1]	Mar 25 $M	Sep 24 $M	Mar 24 $M
Gross impaired assets				
Impaired loans[2]	**636**	**1,020**	881	880
Restructured items[3]	**718**	**1,152**	786	589
Non-performing commitments, contingencies and derivatives[2]	**50**	**80**	26	49
Total gross impaired assets	**1,404**	**2,252**	1,693	1,518
Allowance for expected credit losses[4]				
Individually assessed provision - impaired loans	**216**	**346**	303	320
Individually assessed provision - non-performing commitments, contingencies and derivatives	**11**	**18**	5	5
Collectively assessed provision	**2,669**	**4,280**	4,247	4,046
Total allowance for expected credit losses	**2,896**	**4,644**	4,555	4,371
Total gross loans and advances[5]	**514,229**	**824,613**	**807,707**	**719,310**
Credit risk weighted assets	**235,771**	**378,081**	361,185	348,447
Collectively assessed provision as a percentage of credit risk weighted assets	**1.13%**	**1.13%**	1.18%	1.16%
Gross impaired assets as a percentage of gross loans and advances	**0.27%**	**0.27%**	0.21%	0.21%
Individually assessed provision as a percentage of gross impaired assets	**16.2%**	**16.2%**	18.2%	21.4%
Individually assessed provision for impaired loans as a percentage of impaired loans	**33.9%**	**33.9%**	34.4%	36.4%
Total allowance for expected credit losses as a percentage of:				
Gross loans and advances[5]	**0.56%**	**0.56%**	0.56%	0.61%
Credit risk weighted assets	**1.23%**	**1.23%**	1.26%	1.25%

1. *The USD amounts are disclosed for information purposes only. There is no assurance that the AUD amounts could be translated at the 31 March 2025 Noon Buying Rate applied in this U.S. Disclosure Document.*
2. *Impaired loans and non-performing commitments, contingencies and derivatives do not include exposures that are collectively assessed for Stage 3 Expected credit losses ("ECL"), which comprise unsecured retail exposures of 90+ days past due and defaulted but well secured wholesale and retail exposures.*
3. *Restructured items are facilities where the original contractual terms have been modified for reasons related to the financial difficulties of the customer and are collectively assessed for Stage 3 ECL. Restructuring may consist of reduction of interest, principal or other payments legally due, or an extension in maturity materially beyond those typically offered to new facilities with similar risk. Upon restructuring, an exposure's delinquency status may be re-aged where certain conditions are met.*
4. *Includes allowance for ECL for Net loans and advances - at amortised cost, Investment securities - debt securities at amortised cost and Off-balance sheet commitments - undrawn and contingent facilities. For Investment securities - debt securities at fair value through other comprehensive income ("FVOCI"), the allowance for ECL is recognised in Other comprehensive income with a corresponding charge to profit or loss.*
5. *Consists of loans and advances and capitalised brokerage and other origination costs less unearned income.*

OVERVIEW

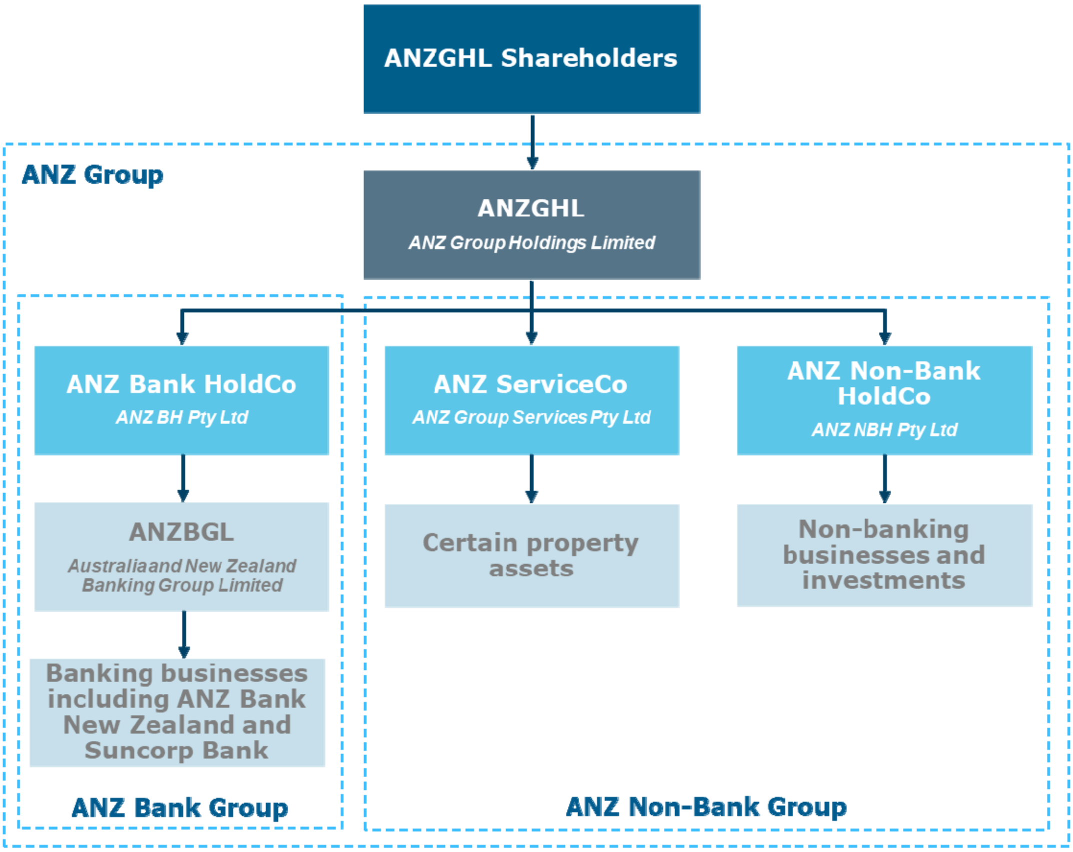
The Group is one of the four major banking groups headquartered in Australia. ANZBGL is a public company incorporated and domiciled in Australia with debt listed on securities exchanges. ANZBGL's registered office is located at Level 9, 833 Collins Street, Docklands, Victoria 3008, Australia, and the telephone number is +61 3 9683 9999. ANZBGL's Australian Business Number is ABN 11 005 357 522.

The Group provides a broad range of banking and financial products and services to retail, small business, corporate and institutional customers. Geographically, operations span Australia, New Zealand, a number of other countries in the Asia-Pacific region, the UK, France, Germany and the United States.

As at 31 March 2025, the Group had total assets of $1,303.0 billion and share capital and reserves attributable to shareholders of the Company of $69.9 billion. In terms of total assets among banking groups, the Group ranked second in Australia[1] as at 31 March 2025 and first in New Zealand[2].

The Group is part of the ANZ Group, which comprises ANZGHL (as the ultimate parent entity of the ANZ Group), the ANZ Bank Group and the ANZ Non-Bank Group (each as set out below).

The composition of the ANZ Group is set out in the diagram below:



It should be noted that ANZGHL:

- Does not guarantee ANZBGL's obligations generally or in connection with debt securities issued by ANZBGL;
- Does not have any obligations under the terms and conditions of senior debt issued by ANZBGL; and
- Does not have any obligations under the terms and conditions of Tier 2 capital securities or Additional Tier 1 capital securities issued by ANZBGL, except to the extent that such securities are convertible into ANZGHL's ordinary shares as provided for in the terms and conditions of such securities.

1. *Source: Commonwealth Bank of Australia results announcement for the half year ended 31 December 2024; National Australia Bank results announcement for the half year ended 31 March 2025; Westpac Banking Corporation results announcement for the half year ended 31 March 2025.*

2. *Source: Reserve Bank of New Zealand Bank Financial Strength Dashboard (https://bankdashboard.rbnz.govt.nz/summary) for the quarter ended 31 December 2024.*

BUSINESS MODEL

The Group's business model primarily consists of raising funds through customer deposits and the wholesale debt markets and lending those funds to customers. In addition, the Group operates a Markets business which earns revenue from sales, trading and risk management activities. The Group also provides payments and clearing solutions.

The Group's primary lending activities are personal lending covering residential home loans, credit cards and overdrafts, and lending to corporate and institutional customers.

The Group's income is derived from a number of sources, primarily:

- Net interest income - represents the difference between the interest income the Group earns on its lending activities and the interest paid on customer deposits and wholesale funding;
- Net fee and commission income - represents fee income earned on lending and non-lending related financial products and services. It includes net funds management income; and
- Other income - includes revenue generated from sales, trading and risk management activities, net foreign exchange earnings, share of associates' profits, gains and losses from economic and revenue and expense hedges, and gains or losses from divestments and business closures.

STRATEGY

The ANZ Group's strategy is focused on improving the financial wellbeing and sustainability of its customers; by providing excellent services, tools and insights that engage and retain customers and help positively change their behaviour.

In particular, the ANZ Group wants to help customers:

- save for, buy and own a liveable home;
- start or buy and sustainably grow their business; and
- move capital and goods around the region and sustainably grow their business.

The ANZ Group's aspiration is to build a simpler, better, more purpose-driven bank through:

- Purpose-led propositions and partnerships that improve financial wellbeing, access to housing and sustainability for its target segments.
- Automated business-services supported by modern, cloud-based technology that is more open, resilient and compliant.
- An agile operating model that encourages innovation and makes it easier for its people to deliver value for customers quickly.
- Disciplined allocation of resources, enhanced delivery capabilities, and an alignment of systems and incentives.

PRINCIPAL ACTIVITIES

The Group operates on a divisional structure with seven divisions: Australia Retail, Australia Commercial, Institutional, New Zealand, Suncorp Bank, Pacific, and Group Centre.

The divisions reported below are consistent with operating segments as defined in AASB 8 *Operating Segments* and with internal reporting provided to the chief operating decision maker, being the Chief Executive Officer.

As at 31 March 2025, the principal activities of the Group's seven divisions were:

Australia Retail

The Australia Retail division provides a full range of banking services to Australian consumers. This includes Home Loans, Deposits, Credit Cards and Personal Loans. Products and services are provided via the branch network, home loan specialists, contact centres, a variety of self-service channels (digital and internet banking, website, ATMs and phone banking) and third-party brokers.

Australia Commercial

The Australia Commercial division provides a full range of banking products and financial services across the following customer segments: SME Banking (small business owners and medium commercial customers) and Diversified & Specialist Businesses (large commercial customers, and high net worth individuals and family groups). It also includes run-off businesses (Central Functions).

Institutional

The Institutional division services institutional and corporate customers and governments across Australia, New Zealand and International (including Papua New Guinea ("PNG")) via the following business units:

- Transaction Banking provides customers with working capital and liquidity solutions including documentary trade, supply chain financing, commodity financing as well as cash management solutions, deposits, payments and clearing.
- Corporate Finance provides customers with loan products, loan syndication, specialised loan structuring and execution, project and export finance, debt structuring and acquisition finance, and sustainable finance solutions.
- Markets provides customers with risk management services in foreign exchange, interest rates, credit, commodities and debt capital markets in addition to managing the Group's interest rate exposure and liquidity position.
- Central Functions consists of enablement functions that help deliver payments services and operational support across both the Institutional division and the wider enterprise.

New Zealand

The New Zealand division comprises the following business units:

- Personal provides a full range of banking and wealth management services to consumer and private banking customers. It delivers services via internet and app-based digital solutions and network of branches, mortgage specialists, private bankers and contact centres.
- Business & Agri provides a full range of banking services, through its digital, branch and contact centre channels, and traditional relationship banking and sophisticated financial solutions through dedicated managers. These cover privately-owned small, medium and large enterprises, the agricultural business segment, government and government-related entities.
- Central Functions includes treasury and back-office support functions.

Suncorp Bank

The Suncorp Bank division provides banking and related services to retail, commercial, small and medium enterprises, and agribusiness customers in Australia.

Pacific

The Pacific division provides products and services to retail and commercial customers (including multi-nationals) and to governments located in the Pacific region, excluding PNG, which forms part of the Institutional division.

Group Centre

Group Centre division provides support to the operating divisions, including technology, property, risk management, financial management, treasury, strategy, marketing, human resources, corporate affairs, and shareholder functions. It also includes minority investments in Asia.

RECENT DEVELOPMENTS

On 3 April 2025, the Group confirmed that ANZBGL has entered into a court enforceable undertaking ("CEU") with APRA for matters relating to non-financial risk management practices and risk culture across the Group, which includes an additional operational risk capital overlay of $250 million that increases operational risk RWA by $3.1 billion and has applied to both Level 1 and Level 2 from 30 April 2025. For further information, see "Section 2 – Information on the Group – Supervision and Regulation – Australia – Regulatory Developments - Other – Non-financial risk management" and "Section 2 – Information on the Group – Risk Factors - Legal and regulatory risk – 16. Regulatory changes or a failure to comply with laws, regulations or policies may adversely affect the Group's Position".

Other than the matter described above, there have been no significant developments since 31 March 2025 to the date of this U.S. Disclosure Document.

COMPETITION

Australia

The Australian banking system is concentrated and highly competitive. As at 31 March 2025, the four major banking groups in Australia (Australia and New Zealand Banking Group, Commonwealth Bank of Australia, National Australia Bank and Westpac Banking Corporation) held approximately 72%[1] of the total Australian lending assets of ADIs that conduct business in Australia. The operations of the smaller regional banks have an emphasis on retail and business (Commercial) banking. A number of international banks also provide banking services in Australia and typically focus on specific segments of the retail, business or institutional markets, holding a minority position in these segments.

The deregulation of the Australian financial system during the early 1980s led to a proliferation of bank financial institutions and non-bank financial institutions that compete in selected markets. Non-bank financial intermediaries, such as building societies and credit unions, compete principally in the areas of accepting deposits and residential mortgage lending. Some large building societies have been granted banking authorisations under the *Banking Act 1959 of Australia* ("Banking Act"). Specialist non-bank residential mortgage lenders and direct (non-branch) banking operators also compete in the residential mortgage sector.

Competition has historically been greater in the housing lending market, which initially resulted from the rise of mortgage originators, and subsequently from growth in the mortgage broker industry and increased activity from non-ADI lenders (non-bank lenders). Providers of housing lending, including ADIs, compete aggressively in both the new lending and refinance markets by offering significant discounts below the advertised rate and offering home loan switching promotions.

The retail deposit market in Australia is also competitive, particularly in times of higher credit growth to support funding and increased lending demand. An Australian Government Guarantee for retail customer bank deposits was introduced in 2008 during the global financial crisis, which led to increased deposits with the major Australian banks and a decrease in deposits with other deposit fund providers. The Australian Government Guarantee refers to temporary arrangements announced by the Australian Government to enable the provision of a guarantee for the deposits and wholesale funding of Australian deposit-taking institutions. In addition, changes in the financial services sector have made it possible for non-banks to offer through various distribution channels (physical and online), products and services traditionally provided by banks.

In the commercial banking segment, competition remains intense across the major and regional banks and other commercial banking providers with a focus on protecting and developing customer relationships, competing on lending, deposits and other banking product and service offerings.

In the institutional market, we believe competitors gain recognition through the quality of their client base, perceived skill sets, structured solutions and pricing, client insights, digital capabilities, reputation, and brands. In Australian domestic markets, competitors at the large corporate and institutional customer level are generally the major Australian banks, some global investment banks, some Asian banks and the boutique operations of large multi-national banking conglomerates with a focus on niche areas.

The banking industry continues to evolve with new digital products and service solutions to meet customer needs and changing customer preferences. Demand for innovative, digital solutions is contributing to further competition from existing and new entrants to the banking industry, particularly in retail banking.

In addition, future economic conditions may have the effect of further impacting the number of financial intermediaries in the markets in which the Group operates over the medium term (for details refer to "Section 2: Information on the Group - Risk Factors – Risks related to the Group's business activities and industry - Competition in the markets in which the Group operates may adversely affect the Group's Position"). However, this may not lead to any medium-term reduction in the level of competition.

Open Banking laws in Australia seek to improve consumers' ability to compare and switch between products and services. This may reduce barriers to new entrants into the banking industry in Australia and increase competition. For further information on Open Banking, including the risks it may pose to the Group, see "Section 2: Information on the Group - Risk Factors – Legal and regulatory risk – Regulatory changes or a failure to comply with laws, regulations or policies may adversely affect the Group's position".

1. *Source: APRA monthly authorised deposit-taking institution statistics March 2025 (published 30 April 2025).*

New Zealand

The New Zealand financial services sector in which the Group operates is subject to competition. ANZ Bank New Zealand's principal competitors are: ASB Bank Limited, Bank of New Zealand, Westpac Banking Corporation/Westpac New Zealand Limited and Kiwibank Limited.

ASB Bank Limited, Bank of New Zealand and Westpac Banking Corporation/Westpac New Zealand Limited are each a subsidiary or branch of a major Australian bank, participating across all customer segments from individuals to large corporates. The key areas in which we compete with Kiwibank Limited are in the retail and business customer segments.

Competition also exists in specific segments from other banks. Rabobank New Zealand Limited is active in retail deposits and agricultural lending markets. Regional banks, such as Heartland Bank Limited and TSB Bank Limited, are competitive in the retail segment. International banks such as The Hong Kong and Shanghai Banking Corporation Limited and MUFG Bank Ltd compete in the institutional market. Since late 2013, New Zealand has also seen Industrial and Commercial Bank of China Limited, China Construction Bank Corporation and Bank of China Limited incorporate subsidiaries as registered banks in New Zealand (since 2017 each bank has also established branches to provide banking services in New Zealand). Their focus appears to be in housing and business lending. However, their market share remains small in these segments.

Historically, the deposit market in New Zealand has been highly competitive. However, competition for deposits moderated as the Large Scale Asset Purchase ("LSAP") program, introduced by the RBNZ to support New Zealand's economic recovery from the COVID-19 pandemic, increased the amount of money circulating in the New Zealand banking system. The RBNZ commenced the gradual reduction of the LSAP program in 2022, and as a result, competition for deposits may increase as the LSAP program gradually unwinds. As at 31 March 2025, lending to the residential mortgage market accounted for over half[1] of the lending in New Zealand by registered banks and this market is a key area of competition.

While non-bank originators have become more active in New Zealand, the growth rate in their total assets has been lower compared to offshore markets, such as Australia, in recent years. Customers continue to move away from physical outlets towards online and digital services, which could prompt the rise of new competitors in the financial services sector. The non-banking sector constituted approximately 3%[1] of total financial system assets as at 31 March 2025.

Potential future economic disruptions, or increased customer demand for personal financial management services in response to inflationary pressures, could impact competition in the New Zealand financial services sector over the medium-term due to changes to regulation and monetary policy, funding cost and credit provision increases, liquidity levels and changes to business strategies.

The New Zealand Commerce Commission conducted a market study into personal banking in New Zealand, releasing its final report on 20 August 2024. The final report includes 14 recommendations that, together, aim to support new entry and expansion, to reduce the regulatory barriers to competition and to empower consumers to get better prices and services. These recommendations may result in the implementation of regulations that increase competition in the New Zealand banking sector. The New Zealand Government will act on all 14 recommendations and expects that its response will be progressed through a cross-section of work sitting across the New Zealand Government, the RBNZ, the Financial Markets Authority and industry. The Commerce Commission expects most recommendations to be implemented by August 2025, however, some measures will take significantly longer.

The New Zealand Parliament's Finance and Expenditure Committee and Primary Production Committee are progressing an inquiry into banking competition. The terms of reference include consideration of the state of competition in banking (including profitability), barriers preventing competition in banking, any possible impact of the regulatory environment on competition and efficient access to lending, rural banking and lending to Māori asset-holders, organisations, businesses and individuals. Written submissions closed in September 2024 and public hearings were held between October and December 2024 and in March and April 2025. The Finance and Expenditure Committee will prepare a report which will inform future policy decisions by the New Zealand Government. The report is expected to be issued by June 2025.

In March 2025, the RBNZ announced that it will conduct a reassessment of key capital settings, with any changes expected to be advised ahead of the 1 July 2026 scheduled increase. The review will build on existing work (including the Finance and Expenditure Committee's inquiry into banking competition) and assess whether the RBNZ's prudential capital requirements for deposit takers are set at the appropriate level to support a stable financial system – one where resilient financial markets, institutions and infrastructures enable a productive and sustainable economy and ultimately promote the prosperity and wellbeing of all New Zealanders. Post conclusion of the review, the RBNZ will determine whether any changes to the existing key capital settings are required.

Asia

Banking in Asia is highly competitive. There are many global banks and regional banks operating in the region in addition to the local banks in each market.

The Group currently operates in multiple countries, focused on institutional banking and delivering financial solutions to customers driven by regional trade and capital flows. We believe the Group's geographic coverage, strength in its domestic markets of Australia and New Zealand, and targeted focus on customers, industries and product specialisation (including Markets and Transaction Banking) enables the Group to differentiate itself from its competitors across the region.

Competition remains robust and a large number of banks have shown a willingness to commit portions of their balance sheet in support of growth opportunities in the region. This has contributed to the net interest margin on institutional lending in Asia being generally lower than that of similar lending in Australia and New Zealand.

While the Group provides a broad suite of financial services to institutional customers, it does not seek to be a bank to the retail or commercial markets in Asia.

[1] *Source: Reserve Bank of New Zealand. March 2025 (Released 30 April 2025)*

SUPERVISION AND REGULATION

As a major banking group, the Group (being ANZBGL and each of its subsidiaries) is subject to extensive regulation by regulatory agencies and security exchanges in each of the major markets where it operates. The Group is part of the ANZ Group (being ANZGHL and each of its subsidiaries). ANZGHL is a non-operating holding company authorised by the Australian Prudential Regulation Authority ("APRA") under the Banking Act (an "authorised NOHC") and the listed parent company of the ANZ Group. This section provides an overview of the regulation and supervision of the Group in Australia, New Zealand and the United States, as well as the ANZ Group. Except to the extent stated herein, all information disclosed in this "Supervision and Regulation" section relates to the Group.

OVERVIEW

APRA

ANZBGL and ANZGHL are APRA-regulated entities, with obligations under the Banking Act and APRA prudential and reporting standards.

A summary of APRA's regulation of the ANZ Group is set out below.

- ANZGHL: is an authorised NOHC. It is required to comply with the conditions of its authorisation, which are summarised below and include specific capital requirements. As an authorised NOHC, it is also subject to regulation under the Banking Act and certain APRA prudential standards. As the head of a Level 3 group, it is required to ensure certain APRA prudential standards are applied appropriately throughout the ANZ Group (including the ANZ Bank Group and relevant members of the ANZ Non-Bank Group).
- ANZ Bank Group: includes the ANZ Group's entities that conduct banking business (including ANZBGL, Suncorp Bank, ANZ Bank New Zealand and the other entities in the Group). ANZBGL and Suncorp Bank are ADIs and the ANZ Bank Group is subject to the full suite of APRA prudential and reporting standards for ADIs, including standards in relation to capital adequacy and liquidity. Refer to "Australia" below for more information on the role of APRA as it applies to the ANZ Bank Group.
- ANZ Non-Bank Group: comprises the ANZ Group's entities that are not within the ANZ Bank Group. Subject to those requirements relating to APRA's authorisation of ANZGHL as an authorised NOHC under the Banking Act, these entities are not subject to ADI-specific regulation, such as bank capital adequacy and liquidity requirements currently applied to ANZBGL. As noted above, ANZGHL is required to apply certain APRA prudential standards appropriately throughout the ANZ Group, including to relevant members of the ANZ Non-Bank Group being those where ANZGHL considers it appropriate to do so to protect the ANZ Group or its customers or where APRA has required ANZGHL to do so.

ANZGHL is required to hold adequate capital to reflect the risks of the whole ANZ Group, including both the ANZ Bank Group and ANZ Non-Bank Group. The ANZ Bank Group's capital requirements, including those applicable to ANZBGL, are determined by existing APRA requirements.

APRA's authorisation of ANZGHL as an authorised NOHC under the Banking Act is subject to certain conditions, including the following:

- ANZ Bank HoldCo and ANZBGL must have at least one independent director who is not on the board of ANZGHL or any ANZ Non-Bank Group entity;
- ANZGHL itself must not undertake any activities other than for example, providing executive leadership across the ANZ Group, holding investments in subsidiaries, raising funds to invest in or support subsidiaries or to conduct its own activities or other activities required to achieve compliance with its prudential obligations, or other activities approved by APRA;
- ANZGHL must obtain APRA's no-objection confirmation prior to starting material activities in ANZ Non-Bank Group;
- ANZBGL must retain ownership of, or access to, all functions critical to its operations;
- non-regulated businesses of the ANZ Group must be financially and operationally separable from ANZBGL; and
- ANZGHL must ensure that the ANZ Non-Bank Group does not carry on any activities that pose excessive risk to the ADI (and ensure that the ANZ Bank Group transfers to the ANZ Non-Bank Group any activities that APRA notifies in writing to constitute an undue risk to the ADI).

APRA has the ability to review and modify these conditions at any time if it considers it appropriate to do so.

RBNZ

For a discussion of the regulation of ANZBGL and ANZ Bank New Zealand (or ANZ Bank New Zealand's subsidiaries) by RBNZ, refer to "Australia" and "New Zealand" below. ANZGHL is not an RBNZ regulated entity.

Other

A number of other regulators maintain oversight and regulation of the ANZ Group (including both the ANZ Bank Group and ANZ Non-Bank Group). In Australia, these regulators include:

- Australian Securities and Investments Commission ("ASIC") – in relation to corporations and securities matters;
- Australian Competition and Consumer Commission ("ACCC") – in relation to competition, fair trading and consumer protection matters;
- Australian Transaction Reports and Analysis Centre ("AUSTRAC") – in relation to anti-money laundering and counter-terrorism financing laws; and
- the Office of the Australian Information Commissioner ("OAIC") – in relation to privacy and freedom of information law.

In the United States, these regulators include the United States Federal Reserve and the Office of the Comptroller of the Currency.

AUSTRALIA

Prudential and Regulatory Supervision

The Supervisory Role of APRA

Since 1 July 1998, APRA has been responsible for the prudential and regulatory supervision of Australian ADIs, which include banks (including ANZBGL), credit unions, building societies, insurance companies and superannuation funds. Prior to this, the Australian banking industry was regulated by the Reserve Bank of Australia ("RBA"). The RBA has retained overall responsibility for monetary policy, financial system stability and payments system regulation. APRA draws authority from the *Australian Prudential Regulation Authority Act 1998* of Australia. APRA is also responsible for prudential regulation and supervision of various other regulated entities, such as authorised NOHCs (including ANZGHL).

APRA requires ADIs to meet certain prudential requirements that are covered in a range of APRA prudential standards.

APRA discharges its responsibilities in part by requiring ADIs subject to its supervision to regularly provide it with reports that set forth a broad range of information, including financial and statistical data relating to their financial position and information in respect of prudential and other matters. APRA gives special attention to capital adequacy, liquidity, earnings, credit quality and associated loan loss experience, concentration of risks, maturity profile of assets and liabilities, operational risks, market risks, interest rate risk in the banking book ("IRRBB"), exposures to related entities, outsourcing, funds management, governance, business continuity management, recovery and resolution planning, audit and related matters, securitisation activities and international banking operations. APRA may also exercise certain investigative powers if an ADI fails to provide information about its financial condition. Where APRA considers that an ADI may become unable to meet its obligations or may suspend payment (among other circumstances), APRA can take control of the ADI's business (including by appointment of a Banking Act statutory manager). APRA also has power to direct the ADI not to make payments in respect of its indebtedness. In addition, APRA has powers under the *Financial Sector (Transfer and Restructure) Act 1999* of Australia to require the compulsory transfer of some or all of an ADI's assets and liabilities or its shares to another body specified by APRA (which need not in all cases be an ADI). Broadly, APRA may require such a transfer in circumstances including where the relevant Australian Minister declares that the transfer should occur, or APRA is satisfied that there has been a contravention of the Banking Act or regulations or instruments made under it or the ADI has informed APRA that it is likely to become unable to meet its obligations or is about to suspend payment, and certain other criteria are met, including that APRA is satisfied that the transfer is appropriate having regard to the interests of the financial sector as a whole. A counterparty to a contract with an ADI cannot rely solely on the fact that a Banking Act statutory manager is in control of the ADI's business or on the making of a direction or compulsory transfer order as a basis for denying any obligations to the ADI or for accelerating any debt under that contract, closing out any transaction relating to that contract or enforcing any security under that contract.

In carrying out its supervisory role, APRA supplements its analysis of statistical data collected from each ADI with selective "on site" visits and formal meetings with the ADI's senior management and the external auditor. APRA has also formalised a consultative relationship with each ADI's external auditor, with the agreement of the ADIs. The external auditor provides additional assurance to APRA that the information sourced from an ADI's accounting records and included in the ADI's APRA reporting is, in all material respects, reliable and in accordance with the relevant APRA prudential and reporting standards. The external auditor also undertakes targeted reviews of specific risk management areas as selected by APRA. In addition, the board of directors of an ADI must make an annual declaration to APRA on risk management of the ADI in the form specified by applicable prudential standards.

Other Australian Regulators

In addition to APRA and its prudential and regulatory supervision, ANZBGL and its Australian subsidiaries are supervised and regulated in some respects by other regulators including ASIC, ACCC, AUSTRAC, OAIC and various securities exchanges.

ASIC is Australia's corporate, markets, financial services and consumer credit regulator. It regulates Australian companies, financial markets, financial services organisations and professionals who deal in and advise on investments, superannuation, insurance, deposit-taking and credit. As the consumer credit regulator, ASIC licenses and regulates people and businesses engaging in consumer credit activities (including banks, credit unions, finance companies, and mortgage and finance brokers). ASIC ensures that licensees meet required standards, including those related to responsibilities to consumers that are set out in the *National Consumer Credit Protection Act 2009* of Australia. As the markets regulator, ASIC assesses how effectively authorised financial markets are complying with their legal obligations to operate fair, orderly and transparent markets. Since 1 August 2010, ASIC has had responsibility for the supervision of trading on Australia's domestic licensed equity, derivatives and futures markets. As the financial services regulator, ASIC licenses and monitors financial services businesses to ensure that they operate efficiently, honestly and fairly. These businesses typically deal in superannuation, managed funds, shares and company securities, derivatives and insurance. ANZBGL provides products and participates in markets regulated by ASIC.

The ACCC is an independent Commonwealth statutory authority that promotes competition and fair trading in the Australian marketplace to benefit consumers, businesses and the community. It also regulates some national infrastructure services. Its primary responsibility is to ensure that individuals and businesses, including the Group, comply with the Australian competition, fair trading and consumer protection laws.

AUSTRAC is Australia's financial intelligence agency and its anti-money laundering and counter-terrorism financing regulator. The Group is required to comply with certain anti-money laundering and counter-terrorism financing legislation and regulations under Australian law, including the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* of Australia (the "AML/CTF Act"). The AML/CTF Act is administered by AUSTRAC.

The OAIC is an independent agency within the Australian Attorney General's portfolio. Its primary functions are privacy, freedom of information and government information policy, with responsibilities including conducting investigations, reviewing decisions, handling complaints, and providing guidance and advice.

Secrecy obligations may apply from time to time under or in connection with applicable laws including, without limitation, anti-money laundering, whistleblowing and banking and prudential laws and regulations. Information subject to such secrecy obligations may not be publicly disclosed.

Capital and Liquidity

Capital

The common framework for determining the appropriate level of bank regulatory capital is set by the Basel Committee on Banking Supervision ("BCBS") under a framework that is commonly known as "Basel 3".

For calculation of minimum capital requirements under Pillar 1 ("Capital Requirements") of the Basel Accord, the Group has been accredited by APRA to use the advanced internal ratings based methodology for credit risk weighted assets and APS 115 *Capital Adequacy: Standardised Measurement Approach to Operational Risk* ("APS 115") for operational risk weighted assets.

APRA has adopted the majority of Basel 3 capital reforms in Australia. APRA views the Basel 3 reforms as a minimum requirement and hence has not incorporated some of the concessions proposed in the Basel 3 rules and has also set higher requirements in other areas. As a result, Australian banks' Basel 3 reported capital ratios are not directly comparable with international peers. The APRA Basel 3 reforms include: increased capital deductions from CET1 capital, an increase in capitalisation rates (including prescribed minimum capital buffers, fully effective from 1 January 2023), tighter requirements around new Additional Tier 1 ("AT1") and Tier 2 securities and transitional arrangements for existing AT1 and Tier 2 securities that do not conform to the new regulations.

For further discussion regarding capital regulatory developments, see "Regulatory Developments – Capital and Liquidity" below.

Liquidity

ANZBGL's liquidity and funding risks are governed by a detailed ANZBGL Board-approved policy framework. The management of the liquidity and funding positions and risks is overseen by the Group Asset and Liability Committee. ANZBGL's liquidity risk appetite is defined by the ability to meet a range of regulatory requirements and internal liquidity metrics mandated by ANZBGL's Board. The metrics cover a range of scenarios of varying duration and level of severity. This framework helps:

- provide protection against shorter-term but more extreme market dislocations and stresses;
- maintain structural strength in the balance sheet by ensuring that an appropriate amount of longer-term assets are funded with longer-term funding; and
- ensure no undue timing concentrations exist in the Group's funding profile.

A key component of this framework is the Liquidity Coverage Ratio ("LCR"). The LCR is a severe short term liquidity stress scenario mandated by banking regulators including APRA. It was introduced as part of the Basel 3 international framework for liquidity risk measurement, standards and monitoring.

Additionally, since its introduction on 1 January 2018, the Group has complied with APRA's Net Stable Funding Ratio ("NSFR") requirement. The Group's Level 2 NSFR was 117% as at 31 March 2025 (116% as at 30 September 2024). ANZBGL seeks to observe strictly its prudential obligations in relation to liquidity and funding risk as required by APRA's APS 210 *Liquidity* ("APS 210"), as well as the prudential requirements of overseas regulators on ANZBGL's offshore operations.

Capital Management and Liquidity within APRA's Regulations

For further details of the Group's capital management and liquidity see "Liquidity and capital resources" set out in Section 3: Operating and Financial Review and Prospects.

Financial Accountability Regime

The *Financial Accountability Regime Act 2023* of Australia (the "FAR Act") establishes an accountability framework for certain entities in the banking, insurance and superannuation industries that are regulated by APRA, and persons who hold certain positions or have certain responsibilities within those entities ("Financial Accountability Regime" or the "FAR"). The FAR Act applies to different types of entities that fall within the definition of "accountable entities" for the purposes of the FAR to be regulated directly by the FAR.

The FAR applies to the following accountable entities:

- ANZGHL (as an authorised NOHC of an ADI);
- ANZBGL (as an ADI);
- Suncorp Bank (as an ADI);
- ANZ Lenders Mortgage Insurance Pty. Limited (as an Insurer); and
- ANZ Staff Superannuation (Australia) Pty. Limited (as a registrable superannuation entity licensee).

The FAR is jointly administered by APRA and ASIC.

Under the FAR, accountable entities and certain individuals, including senior executives and directors, are subject to, or impacted by, accountability obligations. For example, under the FAR, accountable entities are required, amongst other things, to:

- identify and register accountable persons for itself as an accountable entity and for any of its subsidiaries whose business and activities materially and substantially affect the accountable entity (a "significant related entity");
- provide APRA and ASIC with an accountability map which clearly shows its significant related entities and the names, responsibilities and reporting lines of all its accountable persons;
- take reasonable steps to:

  - conduct its business with honesty and integrity, and with due skill, care and diligence;
  - deal with APRA and ASIC in an open, constructive and cooperative way;
  - prevent adverse effects on its prudential standing or prudential reputation;
  - ensure that its accountable persons meet the above standards of conduct, and take reasonable steps to ensure compliance with applicable laws; and
  - ensure that its significant related entities (if any) comply with the FAR in the same way as the accountable entities themselves;
- have in place a remuneration policy that sets out certain matters and ensures that if part of the variable remuneration of an accountable person is to be reduced due to a failure to comply with that person's accountability obligations, the amount of such reduction is not paid or otherwise transferred; and
- notify APRA and ASIC where it has reasonable grounds to believe that it, or an accountable person of itself or its significant related entity has failed to comply with one or more accountability obligations.

Accountable entities may be liable for substantial penalties for failing to comply with their respective FAR obligations. Where accountable persons do not meet their accountability obligations APRA and ASIC are empowered to disqualify those individuals as senior executives or directors without a court order (but subject to a right of administrative review in accordance with the FAR).

Crisis Management

Under the Banking Act, APRA has power to facilitate the orderly resolution of the entities it regulates (and certain of their subsidiaries and holding companies) in times of distress. Powers which could impact the Group include oversight, management and directions powers in relation to ANZBGL and other ANZ Group entities (including ANZGHL) and statutory management powers over regulated entities within the ANZ Group (including ANZGHL). The Banking Act includes provisions which are designed to give statutory recognition to the conversion or write-off of regulatory capital instruments (the "Statutory Conversion and Write-Off Provisions").

The Statutory Conversion and Write-Off Provisions apply in relation to regulatory capital instruments issued by certain financial sector entities (including ADIs, of which ANZBGL is one) that contain provisions for conversion or write-off for the purposes of APRA's prudential standards. Where the Statutory Conversion and Write-Off Provisions apply to an instrument, that instrument may be converted in accordance with its terms. This is so despite any law (other than specified laws, currently those relating to the ability of a person to acquire interests in an Australian corporation or financial sector entity), the constitution of the issuer or the conversion entity for the instrument, any contract to which the issuer is a party or the conversion entity for the instrument, and any listing rules, operating rules or clearing and settlement rules applicable to the instrument. In addition, the Banking Act includes a moratorium on the taking of certain actions, such as denying any obligation, accelerating any debt, closing out any transaction or enforcing any security, on grounds relating to the operation of the Statutory Conversion and Write-Off Provisions.

Regulatory Developments - Capital and Liquidity

RBNZ Capital Requirements

The RBNZ has revised the capital adequacy requirements that apply to New Zealand locally incorporated registered banks. As a result, ANZ Bank New Zealand is materially increasing the level of capital it holds over the transition period from October 2021 to July 2028. In March 2025, the RBNZ announced that it will conduct a reassessment of key capital settings, with any changes expected to be advised ahead of the 1 July 2026 scheduled increase. Whilst the outcomes of this future assessment are unknown, at this time the existing key requirements for ANZ Bank New Zealand still being implemented are:

- ANZ Bank New Zealand's Tier 1 capital requirement will increase to 16% of risk-weighted assets ("RWA"), of which up to 2.5% can be in the form of AT1 capital.
- ANZ Bank New Zealand's total capital requirement will increase to 18% of RWA, of which up to 2% can be Tier 2 capital.
- AT1 capital must consist of perpetual preference shares, which may be redeemable. Tier 2 capital must consist of long-term subordinated debt.

The financial impact of the changes to the RBNZ's capital adequacy requirements on the Group are uncertain at this time. The net impact on the Group's Level 1 CET1 capital, by the end of the transition period in 2028, is dependent on the additional capital required by ANZ Bank New Zealand to comply with the increased capital requirements. Whether the additional capital requirement for ANZ Bank New Zealand results in financial implications for the Group will also depend on whether the Group's Level 1 CET1 ratio is lower than the Group's Level 2 CET1 ratio in 2028.

See "Supervision and Regulation - New Zealand - New Zealand Regulatory Developments - Bank capital adequacy requirements" for more information.

Capital Requirements – An Unquestionably Strong Framework

APRA implemented its final Basel 3 requirements in relation to capital adequacy and credit risk requirements for ADIs on 1 January 2023 with further amendments in June 2024.

In July 2024, APRA released final IRRBB standards for implementation from October 2025. The final impact to the Group is subject to approval from APRA of the Group's IRRBB models and so the final impact is uncertain currently.

In addition, APRA continues to consult and finalise revisions to a number of remaining prudential standards, being market risk and counterparty credit risk. Given the number of items that are yet to be finalised by APRA, the aggregate final outcome from all changes to APRA's prudential standards relating to their review of ADIs 'unquestionably strong' capital framework remains uncertain.

APRA Total Loss Absorbing Capacity Requirements

On 2 December 2021, APRA finalised its loss-absorbing capacity requirements for Australian domestic systemically important banks ("Australian D-SIBs"), including ANZBGL, requiring an increase to their minimum total capital requirement by 4.5% of RWA by January 2026. Excluding the capital requirement changes from APRA's approach to AT1 paper (refer to "APRA's approach to Additional Tier 1 Capital in Australia" below), total Tier 2 ratio will increase to 6.5%. APRA expects the requirement to be satisfied predominantly with additional Tier 2 capital with an equivalent decrease in senior funding. The amount of the additional total capital requirement will be based on the Group's actual RWA as at January 2026.

APRA's approach to Additional Tier 1 Capital in Australia

In December 2024, APRA confirmed that it will phase out the use of AT1 capital instruments to simplify and improve the effectiveness of bank capital in a crisis. As set out in the APRA announcement, under APRA's approach large, internationally active banks such as the Group which have received APRA approval to use the Internal Ratings-based Approach to credit risk capital requirements ("Advanced" banks) will be able to:

- replace the current requirement for 1.5% AT1 capital with 0.25% of CET1 capital and 1.25% of Tier 2 capital;
- increase the minimum CET1 capital requirement from 4.5% to 6.0%, but remove the Advanced portion of the capital conservation buffer ("CCB") of 1.25%;
- keep the total capital minimum, inclusive of APRA buffers, unchanged at 18.25% (including total loss-absorbing capacity ("TLAC") requirements); and
- increase the Tier 2 requirement (inclusive of TLAC) from 6.5% to 7.75%.

APRA has indicated that it will continue to consult industry on consequential amendments to the prudential framework. APRA intends to finalise changes to prudential standards before the end of the 2025 calendar year, with the updated framework to come into effect from 1 January 2027.

It is currently uncertain what impact this change may have on the Group. The impacts could include, but are not limited to, impacts on the Group's cost of funding and/or credit rating impacts on subordinated debt. For further information, refer to "Section 2: Information on the Group – Risk Factors – Regulatory changes or a failure to comply with laws, regulations or policies may adversely affect the Group's Position", "Section 2: Information on the Group – Risk Factors – The Group's credit ratings could change and adversely affect the Group's ability to raise capital and wholesale funding and constrain the volume of new lending, which may adversely affect the Group's Position" and "Section 2: Information on the Group – Risk Factors – Liquidity and funding risk events may adversely affect the Group's Position".

Restrictions on ANZBGL's ability to provide financial support

Effect of APRA's Prudential Standards

APRA's current or future requirements may have an adverse effect on ANZBGL's business, results of operations, liquidity, capital resources or financial condition.

APS 222 sets minimum requirements for ADIs in Australia, including ANZBGL, in relation to the monitoring, management and control of risks which arise from associations with related entities and also includes maximum limits on intra-group financial exposures.

Under APS 222, ANZBGL's ability to provide financial support to related entities (including ANZ Bank New Zealand) is subject to the following restrictions:

- ANZBGL should not undertake any third party dealings with the prime purpose of supporting the business of related entities;
- ANZBGL must not hold unlimited exposures (i.e. should be limited as to specified time or amount) to related entities (e.g. not provide a general guarantee covering any of the obligations of related entities) either in aggregate or at an individual entity level;
- ANZBGL must not agree to cross-default provisions whereby a default by a related entity on an obligation (whether financial or otherwise) triggers or is deemed to trigger a default of ANZBGL on its obligations; and
- the level of exposure, net of exposures deducted from capital, of ANZBGL's Level 1 Tier 1 capital base:
  - (i) to related ADIs or equivalents, such as ANZ Bank New Zealand, should not exceed 25% on an individual exposure basis or 75% in aggregate to all related ADIs or equivalents;
  - (ii) to other related entities:
    - a) in the case of a regulated related entity, should not exceed 25% on an individual exposure basis; or
    - b) in the case of any other (unregulated) related entity, should not exceed 15% on an individual exposure basis; and
    - c) should not exceed in aggregate 35% to all non-ADIs or equivalent related entities.

ANZBGL's exposure to ANZ Bank New Zealand at 31 March 2025 is compliant with the APS 222 limits.

In addition, APRA has confirmed that, from 1 January 2021, no more than 5% of ANZBGL's Level 1 Tier 1 capital base can comprise non-equity exposures to its New Zealand operations (including its subsidiaries incorporated in New Zealand, such as ANZ Bank New Zealand, and ANZBGL's New Zealand branch) during ordinary times. This limit does not include holdings of capital instruments or eligible secured contingent funding support provided to ANZ Bank New Zealand and its subsidiaries (ANZ Bank New Zealand together with its subsidiaries, the "ANZ Bank New Zealand Group") during times of financial stress.

APRA has also confirmed that contingent funding support by ANZBGL to its ANZ Bank New Zealand operations during times of financial stress must be provided on terms that are acceptable to APRA. At present, only covered bonds meet APRA's criteria for contingent funding. APRA also requires that ANZBGL's total exposures to its New Zealand operations must not exceed 50% of ANZBGL's Level 1 Tier 1 capital base.

Effect of the Level 3 framework

In addition, APRA's Level 3 framework as it relates to, among other things, group governance and risk exposures requires the Group to limit its financial and operational exposures to subsidiaries (including ANZ Bank New Zealand).

In determining the acceptable level of exposure to a subsidiary, ANZBGL's Board of Directors should have regard to:

- the exposures that would be approved for third parties of broadly equivalent credit status; and
- the potential impact on ANZBGL's capital and liquidity positions and ability to continue operating in the event of a failure by the subsidiary.

These requirements are not expected to place additional restrictions on ANZBGL's ability to provide financial or operational support to its subsidiaries, including ANZ Bank New Zealand.

Regulatory Developments - Other

Non-financial risk management

Following the 2018 Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry, the ANZ Group commenced a major program to strengthen non-financial risk (“NFR”) management across the ANZ Group, including greater standardisation of risk tolerance, processes and reporting. In practice, NFR refers to the risks that the ANZ Group faces from managing its operations, its processes and systems as well as how it conducts itself.

In 2022 the ANZ Board elevated its review of progress and accountability for the NFR program. At the time, steps included reinforcing the Executive Committee’s accountability and upgrading the technology platform underpinning the new program. The ANZ Board also appointed an independent external expert to monitor and report on progress.

During the half year ended 31 March 2025, the NFR program continued to make progress and meet key milestones.

However, events associated with ANZBGL’s Markets business (see Section 2: Information on the Group – Risk Factors – “Litigation and contingent liabilities may adversely affect the Group’s Position”) highlighted the need for an ongoing improvement in the ANZ Group’s NFR processes and drew a response from APRA, including the requirement to hold an additional operational risk capital overlay. On 3 April 2025, APRA accepted a CEU from ANZBGL to address ongoing weaknesses in NFR management practices and risk culture. APRA has required the ANZ Group (at Level 1 and Level 2) to hold an additional operational risk capital overlay of $250 million (total $1 billion), which has applied from 30 April 2025.

As part of the CEU agreed with APRA, an independent reviewer has been appointed to identify root causes and behavioural drivers of shortcomings in ANZBGL’s NFR practices and risk culture. ANZBGL has committed to developing a remediation plan based on the independent reviewer’s findings that will be ANZBGL Board approved and independently assessed and reported on a 3 monthly basis.

Many elements of the ANZBGL program of work are already underway and while additional resources will be required, it is not expected to have a material impact on the Group’s cost outlook.

ANZ Group also announced on the 3 April 2025 that it has accepted all recommendations of an independent culture and risk governance review into its Global Markets business, commissioned by the ANZ Group Board. The appointment of Oliver Wyman and the scope of the review followed consultation with, and approval by, APRA. The review was in response to concerns around conduct, workplace behaviour and NFR governance within ANZ’s Global Markets business.

The ANZ Group is taking a number of immediate actions in response to the Oliver Wyman report and CEU, including the appointment of senior executives to strengthen NFR management practices and risk culture across the ANZ Group. These actions include:

- The creation of a new Executive role Group Head, Non-Financial Risk Program Delivery reporting to the Chief Executive Officer. Current Head of Singapore and Head of South-East Asia, India and Middle East, Mark Evans, has been appointed to the role. Mr Evans is a former ANZ Chief Compliance Officer and Head of Strategic Planning and Execution for Institutional. This role will be responsible for leading ANZ Group’s response to the CEU in order to strengthen NFR management practices and risk culture in a consistent and sustainable way across the ANZ Group;
- The appointment of Dan Wong to Group General Manager Operational Risk, reporting to Chief Risk Officer Kevin Corbally. Joining from IAG where he was responsible for enterprise risk, Mr Wong will be accountable for ensuring operational risk is integrated into strategic decision-making processes, allowing for a more holistic approach to risk management across the ANZ Group; and
- The ANZ Group Board will require Group Executive Institutional, Mark Whelan, to oversee the implementation of the 19 recommendations and 53 sub recommendations of the Oliver Wyman review. He will be supported by a dedicated working group and secretariat to drive the ANZ Group’s response, and will report to the ANZ Group Board on progress.

These actions build on earlier work including recent appointments in the Markets Sydney dealing room of the Head of Markets Australia, Deputy Head of Markets Australia, Head of Markets Risk, Senior Business Partner, Talent & Culture, and Head of Corporate and Commercial Sales.

Residential mortgage lending practices

APRA closely monitors residential mortgage lending practices and takes steps aimed at strengthening residential mortgage lending standards across the banking industry.

The minimum interest rate buffer as outlined by APRA, requires ADIs to use a buffer of at least 3% over the loan interest rate when assessing the serviceability of home loan applications. APRA has informed ADIs that they must have the ability to limit the extent of lending in the following loan types:

(a) lending with a debt-to-income ratio greater than or equal to four times or six times;

(b) lending with a loan-to-valuation ratio greater than or equal to 80 per cent or 90 per cent;

(c) lending for the purposes of investment;

(d) lending on an interest-only basis; and

(e) lending with a combination of any two of the types specified in (a) to (d).

Changes in classifications for residential mortgage loans

The current classification of ANZBGL's residential mortgage loans, as reported to regulators and the market, is generally determined during the loan origination process (i.e. loan application, processing and funding), based on information provided by the customer or subsequently when a customer requests changes to the loan.

Classification of residential mortgage loans may change due to:

- incorrect classification at origination: to the extent that customers inaccurately advise ANZBGL of their circumstances at origination, there is a risk that loans may be incorrectly classified, and such loans may be reclassified;
- changes in customer circumstances: ongoing appropriateness of a given classification relies on the customer's obligation to advise ANZBGL of any changes in the customer's circumstances and on ANZBGL's ability to independently validate the information provided by its customers. To the extent that customers advise of any changes in their circumstances or when ANZBGL makes such a determination based on its verification processes, a loan may be reclassified;
- regulatory or other changes: the criteria for loan classifications, and their interpretation, may change for one or more reporting purposes, which may affect the classification of certain loans; and
- changes in ANZBGL's systems and processes.

Incorrect classification or re-classification of loans may affect a customer's ability to meet required repayments, such as when an owner-occupied property loan is re-classified to an investment property loan, which may attract a higher interest rate. The inability of customers to meet repayment obligations on re-classified loans may increase the risk of default on such loans, which may adversely affect the Group's Position.

Other

For further information on regulatory developments, including the risks they pose to the Group, see “Section 2: Information on the Group – Risk Factors - Legal and regulatory risk - Regulatory changes or a failure to comply with laws, regulations or policies may adversely affect the Group's Position”.

NEW ZEALAND

The supervisory role of the RBNZ

The *Banking (Prudential Supervision) Act 1989* (the "BPS Act") requires the RBNZ to exercise its powers of registration of banks and prudential supervision of registered banks (including ANZ Bank New Zealand) for the purposes of:

- promoting the maintenance of a sound and efficient financial system; and
- avoiding significant damage to the financial system that could result from the failure of a registered bank.

The main elements of the RBNZ's supervisory role include:

- requiring all banks to comply with certain minimum prudential requirements, which are applied through conditions of registration. These include constraints on connected party exposures, minimum capital adequacy requirements and minimum standards for liquidity risk management, and are set out in more detail below;
- monitoring each registered bank's financial condition and compliance with conditions of registration, principally on the basis of published half-yearly disclosure statements and monthly reporting submitted privately to the RBNZ. This monitoring is intended to ensure that the RBNZ maintains familiarity with the financial condition of each bank and the banking system as a whole, and maintains a state of preparedness to invoke crisis management powers should this be necessary;
- consulting the senior management of registered banks;
- using crisis management powers available to it under the BPS Act to intervene where a bank distress or failure situation threatens the soundness of the financial system;
- assessing whether a bank is carrying on business prudently;
- issuing guidelines and overseeing banks' compliance with anti-money laundering and countering financing of terrorism requirements;
- monitoring banks' outsourcing arrangements to determine whether a registered bank's risks associated with outsourcing are appropriately managed;
- issuing guidelines on banks' internal capital adequacy process and liquidity policy;
- issuing guidelines on corporate governance; and
- maintaining close working relationships with parent bank supervisors (such as APRA in Australia) on bank-specific issues, policy issues and general matters relating to the condition of the financial system in New Zealand and in the countries where parent banks are domiciled.

Registered banks are required to issue half-yearly disclosure statements that contain comprehensive details, together with full financial statements at the full-year, and unaudited interim financial statements at the half-year. The financial statements are subject to full external audit at the end of each financial year and a limited scope review at the end of each financial half-year. Each bank director is required to sign their bank's disclosure statements and to make certain attestations. If the information in the bank's disclosure statement is found to be false or misleading, the bank and its directors may incur criminal or civil penalties.

The RBNZ publishes a quarterly "dashboard" of key information on registered banks on its website. The dashboard aims to improve the public's and market participants' ability to understand and act on information about registered banks' financial strength and risk profile. The information is sourced from private reporting that banks provide to the RBNZ. Information relating to the ANZ Bank New Zealand Group published in the dashboard is not incorporated by reference herein and does not form part of this U.S. Disclosure Document. In some cases, information relating to the ANZ Bank New Zealand Group published in the dashboard has been classified and presented differently to the presentation in the ANZ Bank New Zealand consolidated financial statements.

New Zealand-incorporated banks (including ANZ Bank New Zealand) are required to comply with the Basel 3 capital adequacy requirements, as modified to reflect New Zealand conditions. The RBNZ also requires domestic systemically important banks, including ANZ Bank New Zealand, to maintain a prudential capital buffer of 4.5% of RWA above the minimum ratios or face restrictions on distributions. This prudential capital buffer is progressively increasing to 9% of RWA in July 2028. See "New Zealand Regulatory Developments - Bank capital adequacy requirements" below for further information.

New Zealand-incorporated banks (including ANZ Bank New Zealand) are required to comply with the RBNZ's Liquidity Policy ("BS13"). BS13 requires that New Zealand-incorporated banks meet a minimum core funding ratio ("CFR") of 75% ensuring that at least a minimum proportion of bank funding is met through customer deposits, term wholesale funding and Tier 1 capital.

The RBNZ requires all registered banks to obtain and maintain a credit rating from an approved organisation and publish that rating in their disclosure statements.

In addition, the RBNZ has wide-reaching powers to obtain further information, data and forecasts in connection with its supervisory functions, and to require that information, data, and forecasts be audited.

It also possesses a number of crisis management powers. Those powers include recommending that a bank's registration be cancelled, investigating the affairs of a registered bank, requiring that a registered bank consults with the RBNZ, giving directions to a registered bank, removing, replacing or appointing a director of a registered bank or recommending that a registered bank be subject to statutory management.

If a registered bank is declared to be subject to statutory management, no person may, among other things:

- commence or continue any action or other proceedings including proceedings by way of counterclaim against that bank;
- issue any execution, attach any debt, or otherwise enforce or seek to enforce any judgment or order obtained in respect of that bank;
- take any steps to put that bank into liquidation; or
- exercise any right of set off against that bank.

As part of the RBNZ's supervisory powers, a person must obtain the written consent of the RBNZ before giving effect to a transaction resulting in that person acquiring or increasing a “significant influence” over a registered bank. “Significant influence” means the ability to appoint 25% or more of the board of directors of a registered bank or a qualifying interest (e.g., legal or beneficial ownership) in 10% or more of its voting securities.

New Zealand Regulatory Developments

Bank capital adequacy requirements

The RBNZ has revised the capital adequacy requirements that apply to New Zealand locally incorporated registered banks. As a result, ANZ Bank New Zealand is materially increasing the level of capital it holds over the transition period from October 2021 to July 2028. In March 2025, the RBNZ announced that it will conduct a reassessment of key capital settings, with any changes expected to be advised ahead of the 1 July 2026 scheduled increase. Whilst the outcomes of the future assessment are unknown, at this stage the existing key requirements for ANZ Bank New Zealand still being implemented are:

- ANZ Bank New Zealand’s total capital requirement will progressively increase to 18% of RWA, including Tier 1 capital of at least 16% of RWA. Up to 2.5% of the Tier 1 Capital requirement can be made up of AT1 capital, with the remainder of the Tier 1 requirement made up of CET1 capital. AT1 capital must consist of perpetual preference shares, which may be redeemable. The total capital requirement can also include Tier 2 Capital of up to 2% of RWA. Tier 2 Capital must consist of long-term subordinated debt.
- The capital requirement will include a CET1 prudential capital buffer of 9% of RWA. This will include: a 2% domestic, systemically important bank capital buffer; a 1.5% “early-set” counter-cyclical capital buffer which can be temporarily reduced to 0% following a financial crisis, or temporarily increased; and a 5.5% capital conservation buffer.
- Contingent capital instruments will no longer be treated as eligible regulatory capital. As at 31 March 2025, ANZ Bank New Zealand had NZ$938 million of AT1 instrument that will progressively lose eligible regulatory capital treatment over the transition period to July 2028.

The scheduled increase in capital requirements of 1% of RWA in the Prudential Capital Buffer for New Zealand banks will proceed on 1 July 2025.

Replacement of the BPS Act

Since 1989, prudential supervision and regulation of banks has been governed by the BPS Act. However, the BPS Act is in the process of being replaced by two separate pieces of legislation:

- The *Reserve Bank of New Zealand Act 2021* commenced in July 2022, replacing parts of the BPS Act that relate to the RBNZ's high-level objectives, powers, functions, governance and funding arrangements. Among other things, the *Reserve Bank of New Zealand Act 2021*:
  - establishes a new statutory governance board responsible for all decision-making, except decisions made by the Monetary Policy Committee; and
  - introduces an overarching financial stability objective of protecting and promoting the stability of New Zealand's financial system (in addition to the economic objective and central bank objective).
- The *Deposit Takers Act 2023* (“Deposit Takers Act”) will, among other things:
  - create a single regulatory regime for all bank and non-bank deposit takers;
  - introduce a depositor compensation scheme (“DCS”) which will protect up to NZ$100,000 of protected deposits per eligible depositor, per deposit taker, if a pay-out event is triggered;
  - strengthen accountability requirements for directors of deposit takers;
  - broaden the RBNZ's supervision and enforcement tools; and
  - strengthen and clarify the RBNZ's crisis resolution framework (which in substance carries over the key statutory management powers from the BPS Act but places those powers (where practicable) directly in the hands of the RBNZ as resolution authority).

Until the Deposit Takers Act commences, the current regulatory framework for banks is continuing under the BPS Act.

The DCS will be funded by collecting levies from deposit takers, including ANZ Bank New Zealand, and is targeted for initial implementation on 1 July 2025, ahead of the rest of the Deposit Takers Act coming into effect in 2028.

The DCS is not expected to result in a material increase in costs for ANZ Bank New Zealand.

Conduct regulations for financial institutions

The *Financial Markets (Conduct of Institutions) Amendment Act 2022* (“FMCIA Act”) came into force on 31 March 2025 and implements a broad conduct regime for financial institutions (“CoFI regime”). The CoFI regime requires certain financial institutions (including ANZ Bank New Zealand) to:

- obtain a licence under Part 6 of the *Financial Markets Conduct Act 2013* (“FMC Act”);
- comply with a fair conduct principle (requiring them to treat consumers fairly, including by paying due regard to their interests);
- establish, implement, maintain and comply with an effective fair conduct program to operationalise the fair conduct principle, and publish a summary of the fair conduct program; and
- comply with regulations that regulate sales incentives for staff and others who are involved in providing a relevant service.

The CoFI regime has introduced a broad conduct regime that can be expanded over time with further obligations on regulated entities. In March 2025, the New Zealand Government introduced the Financial Markets Conduct Amendment Bill to Parliament. If passed, the bill will alter the requirements for financial institutions’ fair conduct programs, provide the Financial Markets Authority with broader investigatory powers, and consolidate market services licences. Any amendments to the CoFI Regime are expected to commence in calendar year 2026.

RBNZ review of BS13

The RBNZ is undertaking a comprehensive review of BS13.

The RBNZ's key policy decisions so far include:

- the retention of the RBNZ's existing quantitative liquidity metrics with modifications, rather than the adoption of the Basel III's liquidity framework;
- the tightening of eligibility requirements for liquid assets in New Zealand; and
- the establishment of a committed liquidity facility for currently eligible liquid assets that do not meet the new eligibility requirements.

An exposure draft of the new liquidity standard is expected to be published before the end of 2025. The liquidity standard is currently scheduled to be issued in early 2027 as a core standard under the Deposit Takers Act.

Cyber resilience guidance and information sharing consultation

The RBNZ released new cyber resilience reporting requirements in March 2024.

Under these requirements, ANZ Bank New Zealand (as a regulated entity with more than NZ$2 billion in total assets) is required to:

- report all material cyber incidents to the RBNZ within 72 hours after detection;
- report all cyber incidents to the RBNZ, regardless of materiality, on a six-month basis with the first report due on 30 April 2025; and
- respond to the RBNZ's survey on the cyber capability of regulated entities based on the RBNZ's cyber resilience guidance on an annual basis with the first report due and submitted in September 2024.

Debt serviceability restrictions

From July 2024, new debt-to-income ("DTI") restrictions have applied to registered banks (including ANZ Bank New Zealand) in respect of new lending for residential properties in New Zealand. DTI restrictions set limits on the portion of lending that banks can provide to residential borrowers relative to their income (i.e. with a DTI ratio above a certain threshold). A borrower's (either an individual or household) DTI is calculated by dividing their total debt by total annual income. The RBNZ has set the DTI restrictions so that banks' residential loans to owner-occupiers with a DTI greater than 6 cannot exceed 20% of these residential loans; and their residential loans to investors with a DTI greater than 7 cannot exceed 20% of these residential loans.

Loan-to-value ratio restrictions

In conjunction with the DTI restrictions, see "Debt serviceability restrictions", from July 2024, updated loan-to-value ratio ("LVR") restrictions have applied to registered banks (including ANZ Bank New Zealand) in respect of new lending for residential properties in New Zealand. LVR restrictions set limits on the portion of lending that banks can provide to residential borrowers relative to the value of the residential property provided as security (i.e. with a LVR ratio above a certain threshold). A borrower's (either an individual or household) LVR is calculated by dividing their total loan value by the total value of the property provided as security. The updated LVR settings allow banks to lend:

- up to 20% of the total value of their new owner-occupier lending to borrowers with an LVR of over 80%; and
- up to 5% of the total value of their new investor lending to borrowers with an LVR of over 70%.

Climate-related disclosures

ANZ Bank New Zealand is a "climate reporting entity" and is required to annually prepare group climate statements under the FMC Act and the and the Aotearoa New Zealand Climate Standards. ANZ Bank New Zealand issued its first mandatory climate statement under the FMC Act and the Aotearoa New Zealand Climate Standards for the financial year ending 30 September 2024.

Review of ESAS access criteria

In March 2025, the RBNZ completed a review of the Exchange Settlement Account System ("ESAS") access criteria. ESAS is the payments and settlement system operated by the RBNZ that is used by banks and other approved financial institutions. The new access criteria are expected to expand access to ESAS. In April 2025, the RBNZ opened applications to non-bank deposit takers seeking access to ESAS. The RBNZ says that it expects to open application to other types of entities (such as payment service providers, overseas deposit takers and operators of designated financial market infrastructures) later in 2025. The impact of the revised ESAS access criteria on ANZ Bank New Zealand is uncertain at this stage.

Other

For further information on regulatory developments, including the risks they pose to the ANZ Bank New Zealand Group, see "Risk Factors - Risks related to the Group's business activities and industry - Competition in the markets in which the Group operates may adversely affect the Group's Position" and "Risk Factors - Legal and regulatory risk - Regulatory changes or a failure to comply with laws, regulations or policies may adversely affect the Group's Position".

UNITED STATES

ANZBGL is an indirect subsidiary of ANZGHL and a direct subsidiary of ANZ Bank HoldCo. ANZGHL is the non-operating holding company of ANZBGL. Each of ANZBGL, ANZGHL and ANZ Bank HoldCo has elected to be treated as a "Financial Holding Company" (a "FHC") by the Board of Governors of the Federal Reserve System (the "FRB"). A FHC is allowed to engage, or acquire companies engaged, in the U.S. in activities that are determined by the FRB and the Secretary of the Treasury to be financial in nature or incidental thereto, and, with FRB approval, activities that are determined by the FRB to be complementary to financial activities.

Under the *Bank Holding Company Act of 1956* (the "BHC Act"), the activities of a FHC are subject to restrictions if it is determined that the FHC (including its U.S. branches and agencies and U.S. depository institution subsidiaries) ceases to be "well managed" or "well capitalised" as defined in FRB regulations, the FHC is the subject of an enforcement action requiring it to maintain a specific level of capital, or any U.S. depository institution subsidiary of the FHC fails to maintain at least a "Satisfactory" or better rating under the *Community Reinvestment Act*. The FRB is the "umbrella" supervisor with jurisdiction over FHCs, including ANZBGL, ANZGHL and ANZ Bank HoldCo.

Each of ANZBGL, ANZGHL and ANZ Bank HoldCo is subject to U.S. federal laws and regulations, including the *International Banking Act of 1978* (the "IBA"). Under the IBA, all branches and agencies of foreign banks in the United States, including ANZBGL's New York branch ("New York Branch"), are subject to reporting and examination requirements similar to those imposed on domestic banks that are owned or controlled by U.S. bank holding companies. As a federally-licenced branch regulated primarily by the Office of the Comptroller of the Currency in the United States (the "OCC"), the New York Branch can engage in activities permissible for national banks, with the exception that the New York Branch may not accept retail deposits. As the New York Branch does not accept retail deposits (although it does accept institutional and corporate deposits), the New York Branch is not subject to the supervision of the Federal Deposit Insurance Corporation ("FDIC"). ANZBGL, ANZGHL and ANZ Bank HoldCo are subject to the BHC Act. An FHC's activities as FHC would become subject to restrictions if it does not meet the "well managed" or "well capitalised" requirements or if it were to become the subject of an enforcement action requiring it to maintain a specific level of capital.

Under the IBA, the FRB has the authority to impose reserve requirements on deposits maintained by U.S. branches and agencies of foreign banks, including the New York Branch. The New York Branch must maintain its accounts and records separate from those of ANZBGL, ANZGHL and ANZ Bank HoldCo and must comply with such additional requirements as may be prescribed by the OCC. The IBA and the BHC Act also affect the ability of ANZBGL, ANZGHL and ANZ Bank HoldCo to engage in non-banking activities in the United States.

Under the IBA, a federal branch of a non-U.S. bank is subject to receivership by the OCC to the same extent as a national bank. The Comptroller may take possession of the business and property of a federal branch. The Comptroller has at its disposal a wide range of supervisory and enforcement tools for addressing violations of laws and regulations, and breaches of safety and soundness, which can be imposed upon federal branches. The Comptroller may remove federal branch management and assess civil money penalties. In certain circumstances, the Comptroller may also terminate a federal branch licence at its own initiative or at the recommendation of the FRB.

Each of ANZBGL, ANZGHL and ANZ Bank HoldCo is subject to certain provisions of the *Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010* ("Dodd-Frank"). Dodd-Frank regulates many aspects of the business of banking in the United States and internationally.

Section 13 of the BHC Act and its implementing regulations, commonly referred to as the "Volcker Rule", among other things, generally prohibit banks and their affiliates from engaging in certain "proprietary trading" (but allow certain activities such as underwriting, market making-related and risk-mitigating hedging activities) and limit the sponsorship of, and investment in, certain private funds (including private equity funds and hedge funds), subject to certain important exceptions and exemptions.

Other Dodd-Frank regulations impose minimum margin requirements on uncleared swaps and security-based swaps, require the central execution and clearing of standardised over the counter ("OTC") derivatives on regulated trading platforms and clearing houses, set limits on the size of positions in certain types of derivatives, require the reporting of transaction data to regulated swap and security-based swap data repositories, and provide for heightened supervision of dealers and major market participants in the derivatives markets. ANZBGL is a registered swap dealer under the *Commodity Exchange Act* and Commodity Futures Trading Commission ("CFTC") regulations and is a member of the National Futures Association. While ANZBGL is not a registered security-based swap dealer with the U.S. Securities and Exchange Commission ("SEC"), it may register at such time as it is required or that it considers appropriate. In addition, other affiliated entities within the Group could become subject to swap dealer or security-based swap dealer registration, depending on the level of their swap or security-based swap dealing activities with counterparties that are U.S. persons and certain other categories of counterparties. Even if not required to be registered with the CFTC or the SEC, such entities are potentially subject to certain of the CFTC's or SEC's regulatory requirements, in connection with transactions that they enter into with counterparties that are U.S. persons and certain other categories of counterparties.

The CFTC adopted rules regarding cross-border transactions which, among other things, permit "substituted compliance" by swap dealers located in non-U.S. jurisdictions with regulatory schemes determined by the CFTC to be comparable to its own. The CFTC had made such a determination with respect to certain aspects of Australian law and regulation pursuant to guidance issued by the CFTC, and that determination has continued to remain in effect under the 2020 rules. Pursuant to that determination, ANZBGL is able to rely on substituted compliance with certain Australian rules in lieu of compliance with corresponding CFTC rules.

U.S. prudential regulators, the CFTC and the SEC have implemented rules imposing initial and variation margin requirements on transactions in uncleared swaps and security-based swaps. As ANZBGL is a swap dealer supervised by the FRB and operates the New York Branch that is regulated by the OCC, it is required to comply with the uncleared swap margin rules promulgated by the FRB, Farm Credit Administration, FDIC, Federal Housing Financial Agency and the OCC. These rules impose requirements to collect and post initial and variation margin in respect of in-scope trading with in-scope counterparties. The rules of the prudential regulators and the CFTC also allow non-U.S. swap dealers, such as ANZBGL, to comply with the applicable laws of non-U.S. jurisdictions in lieu of compliance with their margin rules if the prudential regulators make a determination of comparability with respect to such non-U.S. jurisdictions, or otherwise not to comply with U.S. margin rules, with respect to certain categories of transactions and counterparties.

As required by Dodd-Frank and implementing regulations, ANZBGL submitted its most recent triennial U.S. resolution plan to the FRB and the FDIC in June 2022, which was prior to the Restructure. Now, post Restructure, ANZ Group will submit U.S. resolution plans to the FRB and the FDIC under the tailored requirements on resolution planning and a modification of the enhanced prudential standards applicable to foreign banking organisations, depending on the size of their U.S. operations and their risk profile. Accordingly, ANZ Group will be required to submit a resolution plan by 1 July 2025. Each of ANZBGL, ANZGHL and ANZ Bank HoldCo is subject to "enhanced prudential regulations" under Reg. YY, Subpart N, which was adopted pursuant to Dodd-Frank Section 165, and which requires compliance with the financial and risk oversight requirements thereof.

ANZGHL conducts its debt capital markets activities in the United States through ANZ Securities, Inc. ("ANZSI"). ANZSI is a broker-dealer licensed by the SEC and supervised by the SEC and the Financial Industry Regulatory Authority ("FINRA"). ANZSI is also licensed in the states and territories where it does business. The SEC and FINRA have extensive compliance requirements that apply to ANZSI, including record-keeping, transaction and communications monitoring, supervision of ANZSI staff, internal policies and procedures, and many others that govern the day-to-day business of ANZSI. ANZSI is subject to periodic reviews of its operations by the SEC and FINRA.

The U.S. *Foreign Account Tax Compliance Act* ("FATCA") requires financial institutions to undertake specific customer due diligence and provide information on account holders (including substantial owners for certain entities) who are U.S. citizens or tax residents to the United States Federal tax authority, the Internal Revenue Service, either directly or via local tax authorities. If the required customer data collection due diligence and provision of account holder information is not undertaken and provided in a manner and form meeting the applicable requirements, the Group and/or persons owning assets in accounts with Group members may be subjected to a 30% withholding tax on certain amounts. While such withholding may currently apply only to certain payments derived from sources within the United States, no such withholding will be imposed on any payments derived from sources outside the United States that are made prior to the date that is two years after the date on which final U.S. regulations defining the term "foreign passthru payment" are enacted. There is currently no proposed or final definition of "foreign passthru payment" (though legislative requirements and timeframes may be subject to change) and it is therefore impossible to know whether certain payments could possibly be treated as foreign passthru payments.

The discussion above reflects proposed U.S. regulations that eliminate withholding on certain gross proceeds payments and delay the effective date for withholding on payments from sources outside the United States. The U.S. Treasury Department has indicated that taxpayers may rely on the proposed regulations. The discussion assumes that the regulations will be finalised in their current form and will be effective retroactively.

In addition to FATCA, the U.S. may require the Group in certain circumstances to provide certain information to U.S. payers (withholding agents, custodians, etc.), and the Group and/or its customers may face withholding if the Group does not provide such information in compliance with the applicable rules and regulations. Moreover, even if the Group does provide the required information, withholding may still be applicable to certain U.S. source payments.

In the event that any country in which ANZBGL operates does not have or enforce an Intergovernmental Agreement with the United States, and that country has local law impediments preventing compliance with FATCA, the Group may also be subject to broader compliance issues, significant withholding exposure and other operational impacts.

A major focus of U.S. governmental policies affecting financial institutions has been combating money laundering, terrorist financing and violations of U.S. sanctions. The *Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001* (the "Patriot Act") substantially broadened the scope of U.S. anti-money laundering laws by imposing significant compliance and due diligence obligations, identifying crimes and stipulating penalties and expanding the extra-territorial jurisdiction of the U.S. The U.S. Treasury Department has issued a number of regulations implementing various requirements of the Patriot Act, and other U.S. laws with respect to sanctions that apply to U.S. financial institutions, including certain U.S. non-bank subsidiaries and U.S. bank subsidiaries and branches of foreign banks, such as ANZSI and the New York Branch.

Those regulations require financial institutions operating in the United States to maintain appropriate policies, procedures and controls to detect, prevent, and report money laundering and terrorist financing and to verify the identity of their customers. They also require financial institutions in the United States to operate in compliance with U.S. sanctions regimes. In addition, the U.S. bank regulatory agencies have imposed heightened standards and U.S. law enforcement authorities have been taking a more active role, resulting in intensified enforcement of such matters. Recent resolutions of enforcement actions involving other global financial institutions have involved the payment of substantial penalties, agreements with respect to future operation of their businesses and actions with respect to relevant personnel. Failure of a financial institution to maintain and implement adequate policies and procedures to combat money laundering and terrorist financing, and to comply with U.S. sanctions regimes, could have serious legal and reputational consequences for the financial institution, as well as result in the imposition of civil, monetary and criminal penalties.

In January 2021, the *Anti-Money Laundering Act of 2020* ("AMLA") was enacted in the United States. The AMLA is intended to comprehensively reform and modernise U.S. anti-money laundering laws. Among other things, the AMLA codifies a risk-based approach to anti-money laundering compliance for financial institutions, requires the development of standards by the U.S. Department of the Treasury for evaluating technology and internal processes for anti-money laundering compliance and expands enforcement and investigation-related authority, including a significant expansion in the available sanctions for certain violations. Many of the statutory provisions in the AMLA will require additional rulemakings, reports and other measures, and the effects of the AMLA will depend on, among other things, rulemaking and implementation guidance. The Financial Crimes Enforcement Network, a bureau of the U.S. Department of the Treasury, has issued the priorities for anti-money laundering and countering the financing of terrorism policy, as required under the AMLA. The priorities include corruption, cybercrime, terrorist financing, fraud, transnational crime, drug trafficking, human trafficking and proliferation financing.

OTHER REGULATORS

The Group has securities listed on certain securities exchanges in Australia and overseas, including debt securities listed on the ASX and the London Stock Exchange. The Group must comply with the listing requirements applicable to issuers of securities listed on those exchanges.

In addition to the prudential capital oversight that APRA conducts over ANZBGL and its branch operations and the supervision and regulation described above, local banking operations in all of the ANZBGL offshore branches and banking subsidiaries are subject to host country supervision by their respective regulators, such as the RBNZ, the OCC, the FRB, the UK Prudential Regulation Authority ("PRA"), the Monetary Authority of Singapore, the Hong Kong Monetary Authority, the National Administration of Financial Regulation of the PRC (formerly the China Banking and Insurance Regulatory Commission) and other financial regulatory bodies in those countries and in other relevant countries. These regulators, among other things, may impose minimum capitalisation requirements on those operations in their respective jurisdictions.

The Group is also required to comply with certain anti-money laundering and counter-terrorism financing legislation and regulations under the local laws of all the countries in which it operates.

RISK FACTORS

Introduction

The Group's activities are subject to risks and uncertainties that can materially and adversely impact its business, business model, operations, results of operations, reputation, prospects, liquidity, capital resources, financial performance and financial condition (together, the "**Group's Position**"). These risks and uncertainties may be financial or non-financial and may result from external factors over which the Group may have little or no control. The risks and uncertainties described below are not the only ones that the Group may face. Additional risks and uncertainties that the Group is unaware of, or that the Group currently does not consider material, may also become important factors that affect it. If any of the specified or unspecified risks and uncertainties actually occur (individually or collectively), the Group's Position may be materially and adversely affected, with the result that the trading price or value of the Group's equity or debt securities could decline and investors could lose all or part of their investment.

The risk factors below should be considered together with "Forward-Looking Statements" and "Risk Factors Summary" included herein.

Risks related to the Group's business activities and industry

1. **Changes in political and economic conditions, particularly in Australia, New Zealand, the Asia Pacific region, the UK, Europe and the United States (the "Relevant Jurisdictions"), may adversely affect the Group's Position**

The Group's financial performance is influenced by the political, economic and financial conditions in the countries and regions in which the Group, its customers and its counterparties carry on business. The Group can give no assurances as to the likely future conditions in the economies of the Relevant Jurisdictions where the Group has its main operations or other jurisdictions in which the Group operates or obtains funding.

The political, economic and financial conditions in the Relevant Jurisdictions may be impacted by a range of factors including, but not limited to, domestic and international economic events, the stability of the banking system and any related implications for funding and capital markets, other changes in financial markets, global supply chain developments, political developments, pandemics and natural disasters.

Instability in political conditions may result in uncertainty, declines in market liquidity and increases in volatility in global financial markets and may adversely impact economic activity in the Relevant Jurisdictions, which could in turn adversely affect the Group's Position. Recent examples include the conflict in Ukraine and conflicts in the Middle East – including the possibility of these expanding into a wider regional conflict, the implementation of economic security-related legislation, sanctions and trade restrictions in various markets, and heightened tensions between the United States and other economies, including China. In 2025 the United States has announced a range of tariff measures. The scale of the final tariffs is uncertain, and ongoing changes to these tariffs and international responses have resulted in significant volatility in financial markets and economic uncertainty. Further, the imposition of tariffs is likely to negatively impact general economic conditions including GDP, business and consumer confidence and consumer discretionary spending which in turn, may have a negative impact on the Group.

Although the Group does not operate in and does not currently have any material direct exposure to Israel, Gaza, Iran, Lebanon, Russia or Ukraine, any prolonged market volatility or economic uncertainty could adversely affect the Group's Position. Tensions between the United States and China, including with respect to the status of Taiwan, also have the potential to adversely impact the markets in which the Group operates and the Group's Position. These geopolitical issues have led to the implementation of trade restrictions, including increased tariffs and retaliatory trade restrictions imposed by the United States and other jurisdictions, and economic security-related legislation in many markets, including enhanced inbound and outbound investment screening mechanisms, anti-coercion instruments, sanctions, export controls and security-related industrial policy.

Inflationary pressure persists in many economies, including in the Relevant Jurisdictions. Demand for goods and services, geopolitical tensions and past and potential future tariffs, and global economic challenges, such as supply chain issues, weather conditions in agricultural regions, high energy prices, high food prices and tight labour markets, have contributed to high inflation, which has increased the cost of living and reduced disposable income for consumers. Persistent inflation may exacerbate market volatility, slow economic growth and increase unemployment, each of which may cause further declines in business and investor confidence and increase the risk of customer defaults, which could adversely affect the Group's Position.

China is one of Australia's and New Zealand's major trading partners and a significant driver of commodity demand and prices in many of the markets in which the Group and its customers operate. Any heightening of geopolitical tensions and the occurrence of events that adversely affect China's economic growth and Australia's and New Zealand's economic relationship with China, including the implementation of additional tariffs and other protectionist or economic security-related trade policies by the United States or other countries, including sanctions, could adversely affect Australian or New Zealand economic activity and, as a result, could adversely affect the Group's Position. Furthermore, in recent periods, the growth of the Chinese economy has slowed and is forecast to continue to slow, reflecting subdued domestic consumption, property sector softening and exports challenged by increasingly protectionist trade policy in the United States, UK and European Union. If there were a broad-based and sustained economic slowdown in China, the health of the Chinese financial system may be adversely impacted, which could have negative effects on the global financial system and economy. This could result in an economic downturn, counterparties defaulting on their obligations, countries introducing capital controls, and could adversely affect the Group's Position. Refer to risk factor 4 "*Changes in the real estate markets in Australia, New Zealand or other markets where the Group does business may adversely affect the Group's Position*".

There has been a rise in investor caution across global commercial real estate markets as investors are reallocating to other investment classes or waiting for greater certainty regarding inflation and interest rates, particularly as a result of weakening sentiment in the United States and Europe. A global liquidity constraint could compound the effects of weakening fundamentals on valuations and refinance risk in commercial real estate markets. Negative developments in commercial real estate markets could lead to increased credit losses from business insolvencies, increased financial stress and defaults from higher leveraged borrowers, which could adversely affect the Group's Position. Refer to risk factor 4 "*Changes in the real estate markets in Australia, New Zealand or other markets where the Group does business may adversely affect the Group's Position*".

If economic conditions deteriorate in the Relevant Jurisdictions, asset values in housing, commercial or rural property markets could decline, unemployment could rise and corporate and personal incomes could decline. Deterioration in global markets, including equity, property, currency and other asset markets, may impact the Group's customers and the security the Group holds against loans and other credit exposures.

This may impact the Group's ability to recover loans and other credit exposures. In addition, the failure of another bank or financial institution, whether as a result of a deterioration in economic conditions or otherwise, could result in instability in the financial banking system, which could result in disruptions to markets or changes to capital and other regulatory requirements applicable to the Group and affect the Group's Position. Should any of these occur, the Group's Position could be adversely affected. Refer to risk factor 10 "*Credit risk may adversely affect the Group's Position*".

2. Competition in the markets in which the Group operates may adversely affect the Group's Position

The markets in which the Group operates are highly competitive. Competition is expected to continue to increase. Competitors include other banks (both traditional and online), foreign/offshore financial service providers who expand in Australia and/or New Zealand, new non-bank entrants and smaller providers. Examples of factors that may affect competition and negatively impact the Group's Position include:

- entities that the Group competes with, including those outside of Australia and New Zealand, could be subject to lower levels of regulation and regulatory activity. This could allow them to offer more competitive products and services, because those lower levels of regulation may give them a lower cost base and/or the ability to attract employees that the Group would otherwise seek to employ;
- digital technologies and business models are changing customer behaviour and the competitive environment. Competitors are increasingly utilising new technologies, including Artificial Intelligence ("AI"), and disrupting existing business models in the financial services sector and an inadequate adoption of AI or other new technologies within the Group's business processes or customer offerings could pose a strategic disadvantage to the Group relative to its competitors;
- companies from outside of the financial services sector are directly competing with the Group by offering products and services traditionally provided by banks. This includes new entrants obtaining banking licences and partnering with existing competitors, private credit funds, insurance companies, mutual funds, hedge funds, securities brokerage firms, financial technology companies, digital platforms and large global technology companies. Some of these competitors may be subject to different, and in some cases, less stringent legal, regulatory and supervisory requirements, whether due to size, jurisdiction, entity type or other factors, which may place the Group at a relative competitive disadvantage;
- consumers and businesses may choose to transact using, or to invest or store value in, new forms of currency (such as cryptocurrencies, which are largely unregulated, or central bank digital currencies) in relation to which the Group may choose not, or may not be able, to provide financial services, competitively. A new form of currency could change how financial intermediation and markets operate and, with that, may adversely impact the competitive and commercial position of the Group; and
- the Australian and New Zealand Governments may consider implementing policies that further increase competition in the banking market. For example:
  - The Australian Government is conducting a review into the challenges faced by small and medium sized banks that will consider the role they play in competition in the market. The outcomes of the review are not yet clear. The Council of Financial Regulators could make recommendations that, if implemented, may have the effect of reducing the regulatory costs of some of the Group's competitors, increasing their ability to compete with the Group.
  - In August 2024, legislation to establish action initiation within the Consumer Data Right ("CDR") passed the Australian Parliament. The legislation establishes a framework under which the Minister can declare an action that can be initiated under the CDR. CDR consumers could then direct accredited persons, such as the Group's competitors to instruct a declared action on their behalf. No action has yet been declared in respect of banks. If such an action were declared, competitors could offer services to the Group's customers, such as the initiation of payments using the Group's platforms, that would weaken the relationship between the Group and those customers.
  - In March 2025, New Zealand's Customer and Product Data Act 2025 ("CPD Act") received Royal Assent. The CPD Act establishes a New Zealand consumer data right ("CDR") that enables customers to securely share data that is held about them with trusted third parties and to improve consumers' ability to compare and switch products. The Ministry of Business, Innovation and Employment has consulted on a proposal to designate the banking industry under the CPD Act to further the development and deployment of open banking. It is proposing that ANZ Bank New Zealand would be subject to the designation from 1 December 2025.
  - In August 2024, the New Zealand Commerce Commission (the "Commerce Commission") published its recommendation to the Minister of Commerce and Consumer Affairs to designate the interbank payment network under the Retail Payment System Act 2022. If the interbank payment network is designated this will enable the Commerce Commission to use its regulatory powers to promote competition and innovation in the retail payment system. No decision by the Minister on designation has yet been announced.
  - In August 2024, the Commerce Commission published its final report on its market study into competition for personal banking services in the New Zealand retail banking sector. The final report included 14 recommendations that aim to support new entry and expansion, to reduce the regulatory barriers to competition and empower consumers to get better prices and services. The New Zealand Government will act on all 14 recommendations and expects that its response will be progressed through a cross-section of work sitting across the New Zealand Government, the RBNZ, the Financial Markets Authority and industry. The Commerce Commission expects most recommendations to be implemented by August 2025, however, some measures will take significantly longer.
  - The New Zealand Parliament's Finance and Expenditure Committee and Primary Production Committee are progressing an inquiry into banking competition. The terms of reference include consideration of the state of competition in banking (including profitability), barriers preventing competition in banking, any possible impact of the regulatory environment on competition and efficient access to lending, rural banking and lending to Māori asset-holders, organisations, businesses, and individuals. Written submissions closed in September 2024 and public hearings were held between October and December 2024 and in March 2025 and April 2025. The Finance and Expenditure Committee will prepare a report which will inform future policy decisions by the New Zealand Government. The report is expected to be issued by June 2025.
  - In March 2025, the RBNZ announced that it intends to conduct a reassessment of key capital settings, with any changes expected to be advised ahead of the 1 July 2026 scheduled increase. The review will build on existing work (including the Finance and Expenditure

Committee's inquiry into banking competition) and assess whether the RBNZ's prudential capital requirements for deposit takers are set at the appropriate level to support a stable financial system – one where resilient financial markets, institutions and infrastructures enable a productive and sustainable economy and ultimately promote the prosperity and wellbeing of all New Zealanders. If the outcome of the review could impact capital requirements in the future, this will be signaled by the RBNZ.

While these recommendations, policy initiatives or regulatory measures may result in the implementation of regulations designed to increase competition in the banking market, the impact of these recommendations, policy initiatives or regulatory measures on the Group remains unclear.

The impact on the Group of an increase in competitive market conditions or a technological change that puts the Group's business platforms at a competitive disadvantage, especially in the Group's main markets and products, could lead to a material reduction in the Group's market share, customers and margins and adversely affect the Group's Position. Increased competition for deposits may increase the Group's cost of funding. If the Group is not able to successfully compete for deposits, the Group may be forced to rely on less stable and/or more expensive forms of funding, or to reduce lending. This may adversely affect the Group's Position. Geopolitical and economic disruptions could have a significant impact on competition and profitability in the financial services sector due to funding cost and credit provision increases, changes in interest rates, insufficient liquidity, implementation of business continuity plans, changes to business strategies and regulatory safe harbours. A low-growth environment may lead to heightened competitive intensity and margin compression.

3. Acquisitions and divestments may adversely affect the Group's Position

The Group regularly examines a range of corporate opportunities, including acquisitions and divestments, to determine whether those opportunities will enhance the Group's strategic position and financial performance. This includes the recently completed acquisition of Suncorp Bank, to which the risks below apply.

Integration (or separation) of an acquired (or divested) business can be complex and costly. It sometimes includes combining (or separating) accounting and data processing systems, technology platforms and management controls, as well as managing relationships and contracts with employees, customers, regulators, counterparties, suppliers and other business partners. The loss of key relationships and personnel from an acquisition or divestment could have an adverse effect on the Group's Position.

There is no assurance that any due diligence undertaken in respect of an acquisition was conclusive, and that post-acquisition all material issues and risks in respect of any such acquisition have been identified and avoided or mitigated. Therefore, there is a risk that issues or matters may arise that may adversely impact the Group post-acquisition. There is also no assurance that any acquisition (or divestment) will have the anticipated positive results around synergies, cost or cost savings, time to integrate (or separate) and overall performance, as the underlying assumptions for the acquisition (or divestment) may not prove to be accurate or achievable. Any acquisition (or divestment) may also impact the Group's credit ratings, cost of funds and access to further funding, which could in turn adversely affect the Group's funding and liquidity positions.

Integration (or separation) efforts could create inconsistencies in standards, controls, procedures and policies, as well as diverting management attention and resources. There is a risk of counterparties making claims in respect of completed or uncompleted transactions against the Group that could adversely affect the Group's Position. All or any of these factors could adversely affect the Group's ability to conduct its business successfully and impact the Group's operations or results. There is no assurance that employees, customers, counterparties, suppliers and other business partners of newly acquired (or retained) businesses will remain post-acquisition (or post-divestment). Further, there is a risk that completion of an agreed transaction may not occur whether in the form originally agreed between the parties or at all, including due to failure of the Group or the counterparty to satisfy completion conditions or because other completion conditions such as regulatory, shareholder or other approvals are not satisfied. Should any of these integration or separation risks occur, this could adversely affect the Group's Position.

If for any reason any announced acquisition or divestment, is not completed, the Group's ongoing business may be adversely impacted and the Group may be subject to a number of risks. These risks include:

- financial markets may react negatively, resulting in negative impacts on the Group's securities and other adverse impacts;
- the Group may experience negative reactions from its customers, vendors, employees and wider stakeholders;
- the Group may have incurred expenses and may be required to pay certain costs relating to the acquisition or divestment, whether or not it is completed, such as legal, accounting, investment banking, and other professional and administrative fees; and
- matters relating to the acquisition or divestment may require substantial commitments of time and resources by the Group, which could otherwise have been devoted to other beneficial opportunities.

4. Changes in the real estate markets in Australia, New Zealand or other markets where the Group does business may adversely affect the Group's Position

Residential and commercial property lending, together with real estate development and investment property finance, are important businesses of the Group. Major sub-segments within the Group's lending portfolio include:

- residential housing loans (owner occupier and investment); and
- commercial real estate loans (investment and development).

While Australian residential property prices have generally remained resilient to date, the scale and pace of interest rate rises have resulted in commercial property prices declining in Australia and in some segments the full extent of such property price declines may not have yet been evidenced in softening market demand and valuations.

APRA included credit-based macroprudential policy measures within its Prudential Standard APS 220 Credit Risk Management ("APS 220") with effect from 1 January 2023. These may be used by APRA to address systemic risks if needed. Future changes to these measures by APRA could restrict the Group's flexibility and impact the profitability of one or more businesses. Refer to risk factor 16 "Regulatory changes or a failure to comply with laws, regulations or policies may adversely affect the Group's Position".

Despite Australia's recent cash rate reduction in February 2025 (the first reduction since November 2020), higher interest rates since May 2022 and rising costs of living have put pressure on household balance sheets, and this is likely to continue to impact demand for residential and commercial property. These pressures are resulting in an increase in residential property related delinquencies in Australia, which have become more elevated over the year to March 2025. In New Zealand, despite the decrease in interest rates as a result of the RBNZ decreasing the Official Cash Rate, residential mortgage delinquencies have continued to increase over the year to March 2025, due to the higher costs of living and rising unemployment rates.

High interest rates may affect debt serviceability, increase loan defaults by the Group's borrowers, place pressure on loan covenants and reduce demand for commercial and residential property and the Group's associated lending products in Australia. To address inflation levels, interest rates may be maintained at higher levels for an extended period. Any future interest rate rises or persistently high interest rates could also lead to increased credit losses from business insolvencies, increased mortgage stress and defaults, and a potential downturn in the Australian economy. This may in turn impact the ability of tenants to pay rent and in turn decrease the quality of real estate earnings of the Group's borrowers.

For commercial property, interest rate increases, asset price inflation and yield compression may cause declines in interest coverage ratios and asset values. While valuation degradation is not uniform across all commercial real estate sectors, some institutional and private investor clients may see their real estate investment portfolios diminish in value as a result of changes in the real estate market. This could potentially lead to a weakening in their risk profile and a reduction in their willingness and/or ability to repay related loan facilities owed to the Group.

In Australia, valuations are presently lagging market sentiment and therefore valuations across certain asset classes may not have bottomed out. This may result in increased refinance risk and require equity contributions from borrowers towards debt reduction and/or a restructure of facilities. Secondary grade assets may be more susceptible to a decline in prices particularly if investors have overlooked weaker fundamentals during a more favourable economic outlook and interest rate environment.

Refinance risk may also increase if there are liquidity constraints in the banking sector. In Australia, the non-bank debt market remains an available source of funding. Non-bank financiers have supported the pre-development land and property development sector in recent years, so the number of new project starts may decline given higher cost of funding or if non-bank financiers begin to withdraw support from weaker sponsors. There is also potential for contagion risk where the financial stability of a corporate entity or developer could be jeopardised by challenges within the non-bank/private credit sector. If such contagion risk eventuates, this could lead to an increase in loan defaults.

Construction risk issues, including supply chain constraints and a rapid rise in material costs, compounded by labour shortages and increased labour costs, may impact contractor profitability, cash flow, liquidity and financial stability. This in turn may impact delivery risk associated with commercial and larger residential development projects (including the development of land and apartments), the feasibility of such developments and underlying land values in the short to medium term.

In New Zealand, residential and commercial property have seen a period of prolonged weakness since the highs of late 2021 and early 2022. The residential property market has had a recent surge in new listings, with housing inventory being the highest it has been for almost a decade. As a result of the backlog of new stock, the residential housing market is expected to be subdued in the near term, with a slow recovery expected towards the latter half of 2025. Commercial property is showing early signs of recovery, on the back of recent interest rate cuts. The prevailing sentiment suggests that the commercial property market is either at or near the peak of the yield cycle and with further rate cuts anticipated, lower yields are expected in the medium term.

The COVID-19 pandemic triggered an ongoing change in the demand and supply dynamics in the office sector as certain flexible working arrangements have continued, which may impact tenancy demand, reduce rental growth, increase incentives provided by owners to tenants, soften investor demand, yield expectations and value, particularly for secondary grade assets with weaker environmental, social and governance ("**ESG**") (specifically energy efficiency) credentials, given tenants are being more discerning in a less competitive market. Additionally, weaker real estate markets in Europe, America and China could have a contagion effect on demand for Australian and New Zealand assets from foreign equity and debt capital markets.

Each of the factors outlined above may adversely affect the Group's Position.

5. Sovereign risk events may destabilise global financial markets and may adversely affect the Group's Position

Sovereign risk is the risk that governments will default on their debt obligations and be unable to refinance their debts as and when they fall due, thereby destabilising parts of their economies. Sovereign risk may adversely impact the Group directly, through adversely impacting the value of the Group's assets, or indirectly, through destabilising global financial markets, thereby adversely impacting the Group's Position. Sovereign risk exists in many economies, including the Relevant Jurisdictions. If a sovereign defaults, it could impact other markets and countries, the consequences of which may be similar to or worse than those experienced during the global financial crisis and subsequent sovereign debt crises.

6. Market risk events may adversely affect the Group's Position

Market risk is the risk of loss arising from adverse changes in interest rates, currency exchange rates, credit spreads, or from fluctuations in bond, commodity or equity prices. For purposes of financial risk management, the Group differentiates between traded and non-traded market risks. Traded market risks principally arise from the Group's trading operations in interest rates, foreign exchange, commodities and securities. The non-traded market risk is predominantly interest rate risk in the banking book. Other non-traded market risks include transactional and structural foreign exchange risk arising from capital investments in offshore operations and non-traded equity risk. Losses arising from the occurrence of such market risk events may adversely affect the Group's Position.

7. Changes in exchange rates may adversely affect the Group's Position

The Group conducts business in several different currencies. Accordingly, its businesses may be affected by movements in currency exchange rates. The Group's annual and interim reports are prepared and stated in Australian dollars. Any change in the value of the Australian dollar against other currencies in which the Group earns revenues (particularly the New Zealand dollar and the U.S. dollar) or holds capital or issues capital instruments, may adversely affect the Group's reported earnings and/or capital ratios. The Group currently hedges to partially mitigate the impact of currency changes.

There is no assurance that the Group's hedges will be sufficient or effective, and any change in the value of the Australian dollar against other currencies in which the Group earns its revenue, or holds capital, may have an adverse impact on the Group's Position.

8. Pandemics and other public health crises may adversely affect the Group's Position

The effects of a pandemic or other public health crisis may impact the Group's Position and the domestic and global economy, as was the case with the COVID-19 pandemic.

Further, variants with respect to diseases may develop that impact the Group's customers and businesses and could lead to government action, which could adversely impact the Group's Position. Additionally, supply chain disruption and mobility constraints resulting from pandemics or public health crises could result in a decline in the Group's profit margins and could impact customers' cash flows, capital, liquidity and financing needs. Political and economic conditions following such events may cause reduced demand for the Group's products and services, an increase in loan and other credit defaults, bad debts, and impairments and an increase in the cost of the Group's operations. If any of these occur, the Group's Position could be adversely affected.

9. The Restructure of the Group that established a non-operating holding company may adversely affect the Group's Position

In 2023, the Group implemented a Restructure that resulted in ANZGHL becoming the listed parent company of the Group in place of ANZBGL. ANZGHL is a non-operating holding company ("**NOHC**") and is authorised as such for the purposes of the Australian Banking Act. There is a risk that APRA's regulatory framework for NOHCs of Authorised Deposit-Taking Institutions ("**ADI**") and the regulation of ANZGHL over time will differ from the existing regulatory framework and increase the regulatory risk of the Group. In addition, the Group may be affected by the actions of ANZGHL entities outside of the Group, which could result in litigation, increased regulation or reputational impacts and affect the Group's Position.

Risks related to the Group's financial situation

10. Credit risk may adversely affect the Group's Position

The Group is exposed to the risks resulting from or associated with extending credit, including incurring credit-related losses that can occur as a result of a counterparty being unable or unwilling to honour its contractual obligations. Credit losses can and have resulted in financial services organisations realising significant losses and, in some cases, failing altogether.

The risk of credit-related losses continues to be impacted by conditions relating to elevated interest rates, high inflation, global supply chain disruptions and heightened political tensions, particularly those referred to in risk factor 1 "*Changes in political and economic conditions, particularly in Australia, New Zealand, the Asia Pacific region, the UK, Europe and the United States (the "Relevant Jurisdictions"), may adversely affect the Group's Position*". The risk of credit-related losses remains heightened due to the factors described above and may further increase as a result of less favourable conditions, whether generally or in a specific industry sector or geographic region, which could cause customers or counterparties to fail to meet their obligations. These conditions include, but are not limited to, weakened confidence in the stability of the banking system generally or particular financial institutions that may impact the Group, its customers or counterparties, high levels of unemployment, economic slowdown and inflationary conditions, a prolonged period of elevated interest rates, and a reduction in the value of assets the Group holds as collateral or the market value of the counterparty instruments and obligations it holds.

Some of the Group's customers and counterparties with exposures to these sectors may be particularly vulnerable including:

- industries with significant exposure to continued elevated interest rates;
- industries reliant on consumer discretionary spending;
- industries that are exposed to fuel supply shortages and rising costs including aviation, road transport, shipping and agriculture;
- participants in energy or commodity markets that are exposed to rising margin requirements under derivatives that arise due to price volatility;
- mining operations that are exposed to a sustained fall in commodity prices due to supply or demand fluctuation;
- industries at risk of sanctions, tariffs, geopolitical tensions or trade disputes (these include technology, agriculture, resources and extractive industries, communications and financial institutions);
- industries exposed to declining global growth, excessive over-supply and disruption to global supply chains. These include but are not limited to the retail, wholesale, automotive, manufacturing and packaging industries;
- the commercial property sector (including construction and contractors), was exposed to a rapid rise in interest rates, impacting serviceability and placing downward pressure on valuations. Despite recent interest rate reductions in Australia and New Zealand, impacts on valuations are likely to be varied and may take some time to flow through. For more information see risk factor 4 "*Changes in the real estate markets in Australia, New Zealand or other markets where the Group does business may adversely affect the Group's Position*";
- industries facing labour supply shortages and which are reliant on access to both skilled and unskilled migrant workers, including tourism and hospitality, technology, agriculture, retail, health, construction and services;
- customers and industries exposed to disruption from physical climate risk (e.g., bushfires, floods, storms and drought) and transition risk (e.g., carbon reduction requirements and resulting changes in demand for liquidity or goods and services). Losses may be exacerbated if insurance becomes unavailable or unaffordable. For more information on climate-related risks, see risk factor 22 *"Impact of future weather events, nature loss, human rights, geological events, plant, animal and human diseases, and other extrinsic events may adversely affect the Group's Position"*;
- industries exposed to the volatility in exchange rates and foreign exchange markets generally;
- industries with greater exposure to technological disruption, including the increasing adoption and deployment of generative AI and quantum computing; and

- banks and financial services companies, as they may experience pressure on liquidity due to the impacts of economic slowdown, continued elevated interest rates and the flow on impacts to asset values, which could result in the deterioration of credit ratings, the need for restructuring and recapitalisation and loss of confidence in financial institutions.

The Group is also subject to the risk that its rights against third parties may not be enforceable in certain circumstances, which may result in credit losses. Should material credit losses occur to the Group's credit exposures, this may adversely affect the Group's Position.

Credit risk may also arise from certain derivative, clearing and settlement contracts that the Group enters into, and from the Group's dealings with, and holdings of, debt securities issued by other banks, financial institutions, companies, governments and government bodies where the financial conditions of such entities are affected by economic conditions in global financial markets.

In addition, in assessing whether to extend credit or enter into other transactions with customers and/or counterparties, the Group relies on information provided by or on behalf of customers and counterparties, including financial statements and other financial information. The Group may also rely on representations of customers and independent consultants as to the accuracy and completeness of that information. The Group's financial performance could be negatively impacted to the extent that it relies on information that is incomplete, inaccurate or materially misleading.

The Group holds provisions for credit impairment that are determined based on current information and subjective and complex judgements of the impairment within the Group's lending portfolio. If the information upon which the assessment is made is inaccurate or the Group fails to analyse the information correctly, the provisions made for credit impairment may be insufficient, which may adversely affect the Group's Position.

11. Challenges in managing the Group's capital base could give rise to greater volatility in capital ratios, which may adversely affect the Group's Position

The Group's capital base is critical to the management of its businesses and access to funding. Prudential regulators of the Group include, but are not limited to, APRA, RBNZ and regulators in the United States, the UK and the countries in the Asia Pacific region. The Group is required to maintain adequate regulatory capital by its primary regulator APRA and the RBNZ for the ANZ Bank New Zealand Group.

Under current regulatory requirements, risk-weighted assets and expected loan losses increase as a counterparty's risk grade worsens. These regulatory capital requirements are likely to compound the impact of any reduction in capital resulting from lower profits in times of stress. As a result, greater volatility in capital ratios may arise and may require the Group to raise additional capital. There is no certainty that any additional capital required would be available or could be raised on reasonable terms.

The Group's capital ratios may be affected by a number of factors including (i) lower earnings (including lower dividends from its deconsolidated subsidiaries such as those in the insurance business as well as from its investment in associates), (ii) asset growth, (iii) changes in the value of the Australian dollar against other currencies in which the Group operates (particularly the New Zealand dollar and U.S. dollar) that impact risk weighted assets ("RWA") or the foreign currency translation reserve, (iv) changes in business strategy (including acquisitions, divestments and investments or an increase in capital intensive businesses) and (v) changes in regulatory requirements.

For more information on recent prudential regulation changes that have impacted, or that may impact the Group, see risk factor 16 "*Regulatory changes or a failure to comply with laws, regulations or policies may adversely affect the Group's Position*". An inability of the Group to maintain its regulatory capital may adversely affect the Group's Position.

12. The Group's credit ratings could change and adversely affect the Group's ability to raise capital and wholesale funding and constrain the volume of new lending, which may adversely affect the Group's Position

The Group's credit ratings have a significant impact on its access to, and cost of, capital and wholesale funding. The Group's credit ratings may also be important to customers or counterparties evaluating the Group's products and services. Credit ratings and rating outlooks may be withdrawn, qualified, revised or suspended by credit rating agencies at any time. The methodologies used by ratings agencies to determine credit ratings and rating outlooks may be revised in response to legal or regulatory changes, market developments or for any other reason.

The Group's credit ratings or rating outlooks could be negatively affected by a change in the credit ratings or rating outlooks of the Commonwealth of Australia or New Zealand, the occurrence of one or more of the other risks identified in this section, a change in ratings methodologies or other events. As a result, downgrades in the Group's credit ratings or rating outlooks could occur that do not reflect changes in the general economic conditions or the Group's financial condition. The ratings of individual securities (including, but not limited to, certain Tier 1 capital and Tier 2 capital securities and covered bonds) issued by the Group (and other banks globally) could be impacted by changes in the regulatory requirements for those instruments as well as the ratings methodologies used by rating agencies.

Any downgrade or potential downgrade to the Group's credit ratings or ratings outlooks may reduce access to capital and wholesale debt markets and could lead to an increase in funding costs, constrain the volume of new lending able to be extended and affect the willingness of counterparties to transact with the Group, which may adversely affect the Group's Position. Credit ratings are not a recommendation by the relevant rating agency to invest in securities offered by the Group.

13. Liquidity and funding risk events may adversely affect the Group's Position

Liquidity and funding risk is the risk that the Group is unable to meet its payment obligations as they fall due (including repaying depositors and wholesale creditors) or that the Group has insufficient capacity to fund increases in assets. Liquidity and funding risk is inherent in banking operations due to the timing mismatch between cash inflows and cash outflows.

Deterioration and volatility in market conditions and a decline in investor confidence in the Group may materially impact the Group's ability to replace maturing liabilities and access funding in a timely and cost-effective manner, which may adversely impact the Group's Position. Advances in technology allow customers to withdraw funds deposited with the Group faster and may accelerate the risks associated with on-demand liabilities, such as transactional and savings deposits.

The Group raises funding from a variety of sources, including customer deposits and wholesale funding in domestic and offshore markets to meet its funding requirements and to maintain or grow its business. Developments in major markets can adversely affect liquidity in global capital markets. For example, in times of liquidity stress, if there is damage to market confidence in the Group or if funding from domestic or offshore markets is not available or is constrained, the Group's ability to access sources of funding and liquidity may be constrained and the Group will be exposed to liquidity and funding risk.

Reduced liquidity could lead to an increase in the cost of the Group's borrowings, constrain the volume of new lending and adversely affect the Group's ability to fulfill depositor withdrawal demands and its payment obligations, which may adversely affect the Group's Position.

14. Changes in the valuation of some of the Group's assets and liabilities may adversely affect the Group's earnings and equity and the Group's Position

The Group applies accounting standards, which require that various financial instruments, including derivative instruments, assets and liabilities classified as fair value through other comprehensive income, assets and liabilities classified as fair value through profit or loss, and certain other assets and liabilities (as per Note 12 of the Condensed Consolidated Financial Statements (attached as part of the Annex to this U.S. Disclosure Document)) are measured at fair value with changes in fair value recognised in earnings or equity.

Generally, to measure the fair value of these instruments, the Group relies on quoted market prices, present value estimates or other valuation techniques that incorporate the impact of factors that a market participant would take into account when pricing the asset or liability. Certain other assets, including some unlisted equity investments, are valued using discounted cash flow techniques or other valuation techniques as outlined in the Condensed Consolidated Financial Statements (attached as part of the Annex to this U.S. Disclosure Document). The fair value of these instruments is impacted by changes in market prices or valuation inputs that may adversely affect the Group's earnings and/or equity.

The Group may be exposed to a reduction in the value of non-lending related assets as a result of impairments that are recognised in earnings. The Group must test at least annually the recoverability of goodwill balances and intangible assets with indefinite useful lives or not yet available for use and other non-lending related assets including premises and equipment (including right-of-use assets arising from leases), investment in associates, capitalised software and other intangible assets where there are indicators of impairment.

To assess the recoverability of goodwill balances, the Group uses a multiple of earnings calculation. Changes in the assumptions upon which the calculation is based, together with changes in earnings, may materially impact this assessment, resulting in the potential write-off of a part or all of the goodwill balances.

In respect of other non-lending related assets, if an asset is no longer in use or the cash flows generated by the asset do not support the carrying value, impairment charges may be recorded. This, in conjunction with the other potential changes above, could impact the Group's Position.

15. Changes to accounting policies may adversely affect the Group's Position

The accounting policies that the Group applies are fundamental to how it records and reports its financial position and results of operations. Management exercises judgement in selecting and applying many of these accounting policies. This is so that the Group complies with the applicable accounting standards or interpretations and reflects the most appropriate manner in which to record and report on the Group's financial position and results of operations. These accounting policies may be applied inaccurately, resulting in a misstatement of the Group's financial position. The application of new or revised accounting standards or interpretations may also adversely affect the Group's Position. The Group discloses the impact of new accounting standards that are effective for the first time in any reporting period, in the notes to the consolidated financial statements for that period. In some cases, management must select an accounting policy from two or more alternatives, any of which would comply with the relevant accounting standard or interpretation and be reasonable under the circumstances, yet might result in reporting materially different outcomes than would have been reported under the alternative.

Legal and regulatory risk

16. Regulatory changes or a failure to comply with laws, regulations or policies may adversely affect the Group's Position

The Group's businesses and operations are highly regulated. The Group is subject to laws, regulations, and policies, including industry self-regulation, in the Relevant Jurisdictions ("Regulations"). Regulations may be affected by a variety of factors, including recommendations made by inquiries conducted by the Australian Government or other regulators. Regulations continue to change, including with little or no notice, and are generally increasing in scope, scale, complexity, cost and speed of required compliance. Changes to Regulations and any associated increases in compliance costs may affect the profitability of the Group, change the level of competition that the Group faces or affect the ability of the Group to conduct one or more elements of its business. In addition, regulators are coming under increased pressure to take enforcement actions against entities that are not compliant with Regulations. The increasing complexity of Regulations and increased propensity for sanctions and more severe financial penalties for breaches could adversely affect the Group's results and reputation.

Regulations can and do affect the operating environment of, and impose significant compliance costs on, the Group. A failure by the Group to comply with Regulations or manage regulatory change could result in regulatory investigations, litigation, legal or regulatory sanctions, public criticism, financial or reputational loss, restrictions on the Group's ability to do business, fines or other enforcement or administrative actions or penalties. Any of these may adversely affect the Group's Position.

On 3 April 2025, ANZBGL entered into the CEU, which increases the regulatory scrutiny of the Group and introduces heightened risks to the Group in the event of non-compliance, including potential financial or reputational consequences. Failure to meet ANZBGL's obligations under the CEU and any resulting penalties may potentially affect the Group's Position.

Themes of recent Regulations include, but are not limited to, the prudential position of financial institutions, increasing transparency regarding automated decision-making and AI use, the protection of customers, regulatory enforcement and the protection and use of information. Set out below are examples of recent or potential regulatory changes that could affect the Group's Position.

Prudential regulation

Changes to prudential regulation can increase the level of regulatory capital that the Group is required to maintain, restrict the Group's flexibility, require it to incur substantial costs and/or impact the profitability of one or more of its business lines, any of which may adversely affect the Group's Position.

Recent prudential regulation changes that have impacted, or that may impact the Group's Position, include:

- Financial resilience: APRA implemented its new bank capital framework for ADIs on 1 January 2023 that seeks to align Australian standards with the international agreed Basel 3 requirements. In December 2024, APRA published final standards for APS 110 Capital adequacy and APS 116 Capital Adequacy Market Risk, both effective 1 January 2025. Other key regulatory changes include: APS 330 Public Disclosures effective 1 January 2025; APS 210 Liquidity effective 1 July 2025; and APS 117 Capital Adequacy: Interest Rate Risk in the Banking Book effective 1 October 2025. APRA continues to consult and finalise revisions to APS 210 Liquidity, CPS 220 Risk Management (embedding climate risk), CPS 510 Governance, APS111 Capital Adequacy: Measurement of Capital (regarding AT1 capital instruments), and CPS 520 Fit and Proper. APRA are also developing the first system wide risk stress test to understand interconnections across the financial system. The stress test is anticipated to take place in the second half of calendar year 2025 and may lead to regulatory changes. Given the number of items that are yet to be finalised by APRA, the aggregate outcome from all changes to APRA's prudential standards relating to their review of ADIs 'unquestionably strong' capital framework remains uncertain.

- Operational resilience: In July 2023, APRA finalised prudential standard CPS 230 Operational Risk Management, which sets out minimum standards for managing operational risk, including updated requirements for business continuity planning and service provider risk management. The effective date of compliance is 1 July 2025. Prudential Practice Guide for Operational Risk Management CPG 230 was released in June 2024 to provide clearer guidance on minimum requirements. The Group is continuing to work through the implementation process, which requires changes to systems, operations and contractual arrangements with third parties.

- Resolution planning: Prudential Standard CPS 900 Resolution Planning ("CPS 900") became effective on 1 January 2024. CPS 900 requires certain entities, including significant financial institutions, to develop a resolution plan in cooperation with APRA, so the entity can be resolved by APRA in an orderly manner where the entity is unable to, or is likely to be unable to, meet its obligations or suspends, or is likely to suspend, payments.

- Loss absorbing capacity: On 2 December 2021, APRA finalised its loss-absorbing capacity requirements for Australian D-SIBs, including ANZBGL, requiring an increase to their minimum total capital requirement by 4.5% of RWA by January 2026. Excluding the capital requirement changes from APRA's approach to AT1 paper (refer below), total Tier 2 ratio will increase to 6.5%. APRA expects the requirement to be satisfied predominantly with additional Tier 2 capital with an equivalent decrease in senior funding. The amount of the additional total capital requirement will be based on the Group's actual RWA as at January 2026.

  In December 2024, APRA confirmed that it will phase out the use of AT1 capital instruments to simplify and improve the effectiveness of bank capital in a crisis. As set out in the APRA announcement, under APRA's approach, large, internationally active banks , such as the Group, which have received APRA approval to use the Internal Ratings-based Approach to credit risk capital requirements ("Advanced" banks) will be able to:

  - Replace the current requirements for 1.5% of AT1 capital with 0.25% of CET1 capital and 1.25% of Tier 2 capital;
  - Increase the minimum CET1 capital requirement from 4.5% to 6.0%, but remove the Advanced portion of the CCB of 1.25%;
  - Keep the total capital minimum, inclusive of APRA buffers, unchanged at 18.25% (including TLAC requirements); and
  - Increase the Tier 2 requirements (inclusive of TLAC requirements) from 6.5% to 7.75%.

  APRA has indicated that it will continue to consult industry on consequential amendments to the prudential framework. APRA intends to finalise changes to prudential standards before the end of the 2025 calendar year, with the updated framework to come into effect from 1 January 2027.

  It is currently uncertain what impact this change may have on the Group. The impacts could include, but are not limited to, impacts on the Group's cost of funding and/or credit rating impacts on subordinated debt.

- RBNZ revisions to capital adequacy: The RBNZ has revised the capital adequacy requirements that apply to New Zealand locally incorporated registered banks. As a result, ANZ Bank New Zealand is materially increasing the level of capital it holds over the transition period from October 2021 to July 2028. In March 2025, the RBNZ announced that it intends to conduct a reassessment of key capital settings, with any changes expected to be advised ahead of the 1 July 2026 scheduled increase. The net impact on the Group's Level 1 CET1 capital by the end of the transition period in 2028 is dependent on the additional capital required by ANZ Bank New Zealand to comply with the increased capital requirements. Whether the additional capital requirement for ANZ Bank New Zealand results in financial implications for ANZGHL will also depend on whether the Group's Level 1 CET1 ratio is lower than the Group's Level 2 CET1 ratio in 2028. The financial impact of the changes to the RBNZ's capital adequacy requirements on the Group are uncertain at this time.

- NZ contingent capital instrument: ANZ Bank New Zealand has one remaining contingent capital instrument that will no longer be treated as eligible regulatory capital by RBNZ. Contingent capital Additional Tier 1 instruments ("Contingent AT1 Instruments") progressively lose eligible RBNZ regulatory capital treatment over the transition period to 1 July 2028. The maximum eligible regulatory capital value of Contingent AT1 Instruments is the total outstanding value at 30 September 2021 ("Contingent AT1 Base") reduced by 12.5% of the Contingent AT1 Base on 1 January of each year from 2022 to 2028, with no Contingent AT1 Instruments eligible from 1 July 2028.

Other Australian regulation

Other recent developments relating to Australian regulation that have impacted, or that may impact the Group in the future include:

- Climate-related disclosure: Legislation has been passed in Australia to introduce mandatory reporting requirements for large to medium sized companies which are captured within the thresholds. ANZGHL and its subsidiaries including the Group will be required to prepare climate-related disclosures for each annual reporting period commencing 1 October 2025. The legislation requires entities to disclose climate-related risks and opportunities, scenario analysis, a climate-related transition plan, and scope 1, 2 and 3 emissions amongst other disclosures. Scope 3 emissions are only required for the annual reporting period starting 1 October 2026. Assurance requirements will be phased in. A limited, modified liability framework applies for up to three years. ANZGHL and its subsidiaries, including the Group, could face increased costs associated with reporting and compliance with the legislation as well as potential additional scrutiny concerning its climate-related disclosures.
- Privacy: In November 2024, the Australian Parliament passed the Privacy and Other Legislation Amendment Act 2024. This Act implements the first tranche of reforms proposed in the Privacy Act review final report (including regarding enforcement and increasing automated decision-making transparency) with further substantive reforms to be the subject of further targeted consultation. These changes could impact how the Group uses individuals' information and the mechanisms (including new civil penalties) available to enforce privacy obligations.
- Cyber Security: In November 2024, the Australian Parliament passed legislation to amend cyber security laws and make changes to the Security of Critical Infrastructure Act 2018. The changes include a ransomware reporting obligation for businesses and strengthened consequence management powers for the Minister for Cyber Security. Separately, the Australian Government has passed legislation to establish an accreditation scheme for entities providing digital identity services and is consulting on associated rules and standards. Implementation of the legislation could result in increased costs for the Group and may give rise to regulatory enforcement proceedings, for example, if the Group wishes to become a provider of digital identity services or to use digital identities as a part of its onboarding process for customers, which may, in turn, adversely affect the Group's Position.
- Physical banking: In February 2025, the Australian Government announced it had 'secured commitments from the banks' to ensure regional banking services remain available and that it will continue work to ensure regions have access to fit-for-purpose, sustainable banking services over the long term The Australian Government has consulted on mandating providers of essential goods and services (excluding small businesses) to accept cash payments where in person payment is offered. Implementation of the mandate would likely require supporting cash-in-transit measures which could result in increased costs to the Group. Separately, the Australian Competition and Consumer Commission has granted interim authorisation to the Australian Banking Association ("**ABA**"), its member banks, and other relevant industry participants to discuss and develop arrangements to maintain the physical distribution of cash throughout the Australian economy and to implement certain business continuity measures. The authorisation applications by the ABA followed concerns expressed by the major supplier of cash-in-transit services in Australia, Armaguard, that the industry is not sustainable in its current form given the declining use of cash. Disruptions to cash-in-transit services could have a material impact on the Group's ability to provide cash to customers. Measures concerning cash-in-transit (which could include business continuity measures) could result in increased costs to the Group.
- Financial Accountability Regime: ANZGHL, ANZBGL and Suncorp Bank are accountable entities regulated by the Financial Accountability Regime (the "**FAR**"). FAR also applies to ANZ Lenders Mortgage Insurance Pty Ltd and ANZ Staff Superannuation (Australia) Pty Ltd as accountable entities from 15 March 2025. Under the FAR, accountable entities, their significant related entities, and certain individuals, including senior executives and directors, are subject to or impacted by new or heightened accountability obligations. Potential risks to the Group include the risk of penalties and the risk to the Group's ability to attract and retain directors and senior executives.
- Payments: In November 2024, the Australian Government released its Cheques Transition Plan, which sets out the Australian Government's expectations of industry for the winding down of Australia's cheques system in 2029. In October 2024, the Australian Government announced that it was prepared to ban surcharging on debit card transactions from 1 January 2026, subject to consultation by the Reserve Bank of Australia and sufficient steps being taken to ensure both small businesses and consumers could benefit from lower costs. Also, in October 2024, the Reserve Bank of Australia commenced a review into merchant card payments costs and surcharging. Potential regulatory actions aimed at putting downward pressure on merchant card payment costs could adversely affect the Group's Position.

Other New Zealand regulation

The New Zealand Government and regulatory authorities have proposed and have implemented significant legislative and regulatory changes for New Zealand financial institutions.

The Deposit Takers Act is expected to be fully implemented in mid-2028. The RBNZ is undertaking a multi-year work program to develop policy, standards and regulations to support the commencement of the Deposit Takers Act. The Deposit Takers Act will also introduce the Depositor Compensation Scheme. The scheme will commence on 1 July 2025 and will protect up to NZ$100,000 of eligible deposits per depositor, per deposit taker, if a pay-out event is triggered.

The RBNZ has announced that it will undertake a reassessment of the increasing capital requirements that apply to banks in New Zealand in 2025 and intends to make final decisions by the end of 2025.

The New Zealand Government has also introduced a customer data right regime and intends for that to apply to ANZ Bank New Zealand (and the three other major New Zealand banks) from 1 December 2025.

Other recent New Zealand changes include the introduction of a conduct regime for financial institutions and a climate-related disclosure regime.

Such changes may adversely affect the ANZ New Zealand Group, potentially impacting its corporate structures, businesses, strategies, capital, liquidity, funding and profitability, cost structures, and the cost of and access to credit for its customers and the wider economy. This in turn may adversely affect the Group's Position.

17. Litigation and contingent liabilities may adversely affect the Group's Position

From time to time, the Group may be subject to material litigation, regulatory actions, legal or arbitration proceedings and other contingent liabilities that may adversely affect the Group's Position.

The Group had contingent liabilities as at 31 March 2025 in respect of the matters outlined in Note 17 of the Condensed Consolidated Financial

Statements (attached as part of the Annex to this U.S. Disclosure Document). Note 17 includes, among other things, the following matters:

- regulatory and customer exposures;
- South African rate action;
- Esanda dealer car loan litigation;
- OnePath superannuation litigation;
- New Zealand loan information litigation;
- security recovery actions; and
- warranties, indemnities and performance management fees.

The Group regularly engages with its domestic and international regulators and other statutory and supervisory bodies. The nature of these regulatory interactions can be wide ranging and include regulatory investigations, surveillance and reviews, reportable situations, formal and informal inquiries and regulatory supervisory activities in Australia and globally. The Group also receives notices and requests for information from its regulators and other bodies from time to time as part of both industry-wide and Group-specific reviews and makes disclosures to its regulators at its own instigation.

There has been a recent increase in the number of matters on which the Group has engaged with its regulators. Recent interactions relate to matters including:

- markets transactions and data reporting. ASIC is investigating the execution by ANZBGL of a 2023 issuance of 10-year Treasury Bonds by the Australian Office of Financial Management ("AOFM") and errors in ANZBGL's reporting of secondary bond market turnover data to the AOFM;
- anti-money laundering and counter-terrorism financing obligations, processes and procedures. For example, in recent periods, AUSTRAC has conducted reviews and made inquiries with ANZBGL and Suncorp Bank. A number of potential non-compliance instances identified by AUSTRAC have been subject to ongoing uplift programs with regular reporting to AUSTRAC. The Group continues to self-identify and report AML/CTF compliance issues to AUSTRAC, and provides updates to AUSTRAC on remediation activities on a regular basis; and
- non-financial risk management practices including customer service processes relating to complaints, hardship, deceased estates and remediation, compliance with mandatory reporting obligations, the application of interest and fees on certain products and the financial accountability regime.

The possible exposures associated with the Group's regulatory interactions may include civil enforcement actions, criminal proceedings, fines and penalties, imposition of capital or liquidity requirements, customer remediation, the requirement to conduct independent reviews, sanctions or the exercise of other regulatory powers.

There may also be exposures to customers, third parties and shareholders which are additional to any regulatory exposures. These could include class actions or claims for compensation or other remedies.

The outcomes and total costs associated with these possible regulatory, customer and other exposures remain uncertain.

There is however a risk that contingent liabilities may be larger than anticipated or that additional litigation, regulatory actions, legal or arbitration proceedings or other contingent liabilities may arise.

18. Significant fines and sanctions in the event of breaches of law or regulation relating to anti-money laundering, counter-terrorism financing, sanctions and scams may adversely affect the Group's Position

Laws and regulations relating to anti-money laundering, counter-terrorism financing and sanctions have increased in complexity in recent years. Regulatory reforms relating to anti-money laundering, counter-terrorism financing and other related matters, and extended sanctions and enforcement actions taken domestically and internationally continues to be a focus of the Group.

Anti-money Laundering and Counter-Terrorism Financing ("AML/CTF")

In December 2024, the Australian Parliament passed legislation to extend the AML/CTF regime to Tranche 2 entities such as real estate professionals, dealers in precious stones, metals and products, lawyers, conveyancers, accountants and trust and company service providers. This legislation also amends the regime's requirements including those relating to AML/CTF programs, risk assessments, customer due diligence, reporting of cross border transfers (currently known as International Funds Transfer Instructions) and tipping off. Whilst most of these reforms have a commencement date of 31 March 2026 and 1 July 2026 (for entities that only provide "Tranche 2" designated services), some have already taken effect, such as changes to AUSTRAC's investigation powers which took effect from January 2025 and the amended tipping-off offence, which took effect from 31 March 2025. As a result of these reforms, the Group will need to make changes to its AML/CTF programs and policies to address the updated requirements, including those that take effect from 31 March 2026.

The Australian AML/CTF regulator, AUSTRAC, uses its regulatory tools and powers to ensure reporting entities understand and comply with their obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act) and the Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1). A reporting entity is a legal entity that provides at least one 'designated service' to a customer, such as opening a bank account. To date, AUSTRAC has taken three civil penalty actions resulting in fines against other major banks and has also required these banks to remediate the deficiencies found. Additionally, AUSTRAC has used enforceable undertakings and infringement notices to make sure reporting entities comply with the law.

The New Zealand Government has also undertaken a review of its Anti-Money Laundering and Countering Financing of Terrorism Act 2009 ("NZ AML/CFT Act"). Regulations were introduced in three tranches. The first of the three tranches of regulations was introduced in July 2023 (consisting of largely definitional changes and clarifications). The second tranche of regulations came into force in June 2024, making changes to various existing obligations (including customer due diligence, enhanced due diligence, and ongoing due diligence requirements) and introducing new obligations (including a specific recordkeeping obligation in relation to prescribed transaction reporting). The third tranche of regulations will come into force in June 2025 and will introduce further obligations for customer risk rating. Further reform will be delivered through amendments to the primary NZ AML/CFT Act through three workstreams. The first workstream includes notable changes to enhanced customer due diligence, customer screening and address verification requirements. The second workstream will introduce a levy on reporting entities and consolidate the AML/CFT supervisor model from three supervisors into one. The third workstream will bring additional changes, including bringing proliferation financing into the regime. Although there is no clear view of the outcome of the reforms at this stage, the reform process could lead to new regulatory requirements being imposed on the Group, which may adversely affect the Group's Position.

The RBNZ has also stated that its appetite for taking formal enforcement action for breaches of New Zealand's AML/CTF legislation has increased. The propensity for other regulators (including in Asia and the Pacific) to take action for non-compliance with AML/CTF laws has also increased which may adversely affect the Group's Position.

Sanctions

The external sanctions and export control landscape continues to evolve in complexity, with regulatory expectations expanding and enforcement for non-compliance a focus of many regulators. The imposition of sanctions targeting individuals and entities, including those involved in evasion networks operating globally, by regulators since the beginning of the Russia-Ukraine conflict in February 2022 continues. Although, to date, there is an element of co-ordination between Australia, the United States, Europe, and other key partners, with sanctions linked to foreign policy objectives, nuances between the different regimes and specific restrictions are evidenced. Companies continue to assess their risk appetite regarding ongoing direct and indirect business activity involving Russia or Russian-owned or controlled entities, with secondary sanctions risk a consideration. This has heightened the operational and compliance risks in navigating those relationships, transactions and dealings. This situation is expected to continue whilst the conflict persists.

Scams

Scams continue to be pervasive and evolve quickly within financial services and other sectors. The Australian Government has passed legislation to establish a Scams Prevention Framework ("**SPF**") which sets expectations about how organisations govern, prevent, detect, report, disrupt and respond to scams. The Framework is expected to cover banks, telecommunication providers and digital platforms. ANZBGL is adopting measures to ensure compliance with the SPF.

Close monitoring of the different levels and types of financial crimes continues across the Group. The risk of non-compliance remains high given the scale and complexity of the Group and the multiple reforms underway. Emerging technologies, such as those provided by virtual asset service providers (e.g., digital currency exchanges and wallet providers) as well as increasingly complex remittance arrangements via fintechs and other disruptors, may limit the Group's ability to track the movement of funds, develop relevant transaction monitoring, and meet reporting obligations. The complexity of the Group's technology, and the increasing frequency of changes to systems that play a role in AML/CTF and sanctions compliance puts the Group at risk of failing to identify an impact on the systems and controls in place. A failure to operate a robust program to report the movement of funds, combat money laundering, terrorism financing, scams and other serious crimes may have serious financial, legal and reputational consequences for the Group and its employees.

Consequences can include fines, criminal and civil penalties, civil claims, reputational harm and limitations on doing business in certain jurisdictions. These consequences, individually or collectively, may adversely affect the Group's Position. The Group's foreign operations may place the Group under increased scrutiny from regulatory authorities and subject the Group to increased compliance costs.

19. Changes in monetary policies may adversely affect the Group's Position

Central monetary authorities (including the RBA, the RBNZ, the United States Federal Reserve, the European Central Bank, the Bank of England and monetary authorities in the Asian jurisdictions in which the Group operates) set official interest rates or take other measures to affect the demand for money and credit in their relevant jurisdictions. In some jurisdictions, currency policy is used to influence general business conditions and the demand for money and credit. These measures and policies can significantly affect the Group's cost of funds for lending and investing and the return that the Group will earn on those loans and investments. These factors impact the Group's net interest margin and can affect the value of financial instruments it holds, such as debt securities and hedging instruments. The measures and policies of the central monetary authorities can also affect the Group's borrowers, potentially increasing the risk that they may fail to repay loans. Changes in interest rates and monetary policy are difficult to predict and may adversely affect the Group's Position. Refer to risk factor 4 *"Changes in the real estate markets in Australia, New Zealand or other markets where the Group does business may adversely affect the Group's Positio*n" and risk factor 10 "*Credit risk may adversely affect the Group's Position".*

20. Ongoing significant compliance costs with respect to the evolving and extensive Automatic Exchange of Information ("AEoI") obligations imposed by global customer tax transparency regimes may adversely affect the Group's Position

There continues to be mandatory and substantial changes to, and increasing regulatory focus on, compliance by all global Financial Institutions ("FIs"), including FIs within the Group, with global customer tax transparency regimes, under the Foreign Account Tax Compliance Act ("FATCA"), the Organisation for Economic Co-operation and Development's ("OECD's") Common Reporting Standard ("CRS") and similar anti-tax avoidance regimes. This includes global regulatory movement to enforcement and penalty activities and increasing regulatory implementation of additional compliance framework requirements, compliance assessment requirements, questionnaires, onsite financial institution audits, evidentiary requirements, detailed rules and frameworks to close down circumventions and deter, detect and penalise non-compliance. The ongoing OECD government level peer reviews and Internal Revenue Service and regulatory FI compliance review/audit requirements increase scrutiny and therefore unplanned workload of FIs globally. Each country of CRS adoption is being pushed by the OECD to ensure its penalty regime is sufficient to deter and penalise non-compliance.

As the Group is an in scope FI operating in a globally interlinked operating environment, the highly complex and rigid nature of the obligations under each country's varied implementation of these regimes present heightened operational and compliance risks for the Group. As international regulatory compliance frameworks mature and regulators shift focus to enforcement (which may include financial penalties and other more general tax risk framework implications), this may result in significant penalty provision requirements and reputational damage in the event of failures. Accordingly compliance with global customer tax transparency regimes is a key area of focus and major cost for the Group.

Under FATCA and other relevant U.S. Treasury Regulations, the Group could be subject to:

- a 30% withholding tax on certain amounts (including amounts payable to customers), and be required to provide certain information to upstream payers, as well as other adverse consequences, if the ongoing detailed obligations are not adequately met; and
- broader compliance issues, significant withholding exposure, competitive disadvantage and other operational impacts if the FATCA Intergovernmental Agreements between the United States and the applicable jurisdictions in which the Group operates cease to be in effect.

Under the CRS, the Group:

- faces challenges in developing countries where the Group has operations, such as the Pacific region. The local regulators in these countries are generally assisted by a ‘partner’ country. The introduction of standards and evidentiary requirements continue to be challenging to implement and adhere to;
- must deal with substantial ongoing country specific variations in local law and regulatory implementation, with significant broader ‘justified trust’ ramifications and penalties for non-collection or failed reporting in respect of prescribed customer information;
- is under increasingly stringent regulatory scrutiny and measures as regulators turn their focus to the effectiveness of FI implementation. This tightening of regulatory focus, at a varying pace in each country, can lead to significant negative experiences for affected customers (including unilateral account blocking and closure, and potential direct customer penalties), which may adversely affect the Group’s Position and if not similarly implemented by other FIs, may present a significant competitive disadvantage and loss of business;
- faces poor customer outcomes with customers who may feel aggrieved as a result of blocking and closure impacts including increased potential exposure to legal and third party liability, particularly where the Group has not communicated the regulatory issue clearly to a customer or has blocked or closed the account incorrectly (for example, due to a data or process error); and
- continues to deal with the substantial implementation challenges associated with the complex requirements relating to intermediaries, which may also increase the risk of regulatory ramifications.

The scale and complexity of the Group means that the risk of non-compliance with FATCA, CRS and other tax reporting regimes is high. The loss of key resources and critical subject matter expertise, combined with the challenge of finding qualified replacements, increases the risk of non-compliance with these obligations. A failure to successfully operate the implemented processes or to identify and implement all obligations could lead to legal, financial and reputational consequences for the Group and its employees. Consequences include fines, criminal and civil penalties, civil claims, reputational harm, competitive disadvantage, loss of business and constraints on doing business.

External factors, such as natural disasters, the continuing effects of ongoing health pandemics and geopolitical events, have resulted in challenges for staff, including unplanned staff absences, access to systems, tools and information, and impacted the delivery of the Group’s regulatory obligations on requisite timeframes, including mandatory FATCA and CRS regulatory reporting, customer follow-up strategies, resolution and action of regulatory recommendations, as well as continuous improvement activities required to achieve the zero rate of error expected by regulators. The Group’s global taxation obligations in relation to the enterprise’s own tax lodgements and payments may similarly be impacted. Initial leniency from global regulators continues to be tightened or withdrawn due to the regulatory expectation for FIs to adapt to the ongoing challenges presented by external factors, thus heightening the risk of regulatory scrutiny, associated penalties and reputational ramifications resulting from any deficiencies or delays in meeting regulatory obligations.

These consequences, individually or collectively, may adversely affect the Group’s Position.

21. Unexpected changes to the Group’s licence to operate in any jurisdiction may adversely affect the Group’s Position

The Group is licensed to operate in various jurisdictions. Unexpected changes in the conditions of the licences to operate by governments, administrations or regulatory agencies that prohibit or restrict the Group from trading in a manner that was previously permitted may adversely affect the Group’s Position.

Environmental, social and governance risks

22. Impact of future weather events, nature loss, human rights, geological events, plant, animal and human diseases, and other extrinsic events may adversely affect the Group’s Position

The Group and its customers are exposed to ESG risks, including from weather events (including natural disasters), geological events (such as volcanic or seismic activity or tsunamis), nature loss (including as a result of species extinction or decline, or ecosystem degradation), plant, animal and human diseases or pandemics such as COVID-19 and human rights risks. Each of these can cause significant impacts on the Group’s operations and its customers.

Climate-related physical risks are increasing, which is observed through increases in the average global temperature and the impacts of more regular extreme weather events. Weather events may include severe storms, bushfires, cyclones and floods. Longer-term changes in climate patterns may include rising sea levels and changes in temperature and precipitation (including drought). The impact of these events may be widespread including through second order impacts. For example, the economic impacts of a drought may extend beyond primary producers to other customers of the Group, including suppliers to the agricultural sector, and to those who reside in, and operate businesses within, affected communities. As a result, the Group may be exposed to weather events directly, and through the impact of these events on its customers (Refer to risk factor 23 “*Risks associated with lending to customers that could be directly or indirectly impacted by climate risk may adversely affect the Group’s Position*”).

Nature is an emerging risk that the Group is seeking to understand further. Nature risks can arise from lending to customers with material impacts or dependencies on nature. These risks can also arise from legal and regulatory changes, which may impact the Group directly or indirectly through the Group’s customers. Failure to manage these risks may lead to financial and non-financial risks and may adversely affect the Group’s Position.

Human rights risks relate to the safety and security of the Group's people, labour rights, modern slavery, privacy and consumer protection, corruption and bribery, environmental protection and land access and rights. The Group uses risk-based due diligence to identify human rights risks and impacts associated with its business relationships. Failure to manage these risks may adversely affect the Group's Position.

Laws and regulations relating to climate change, nature, human rights, or other ESG risks, as well as the perspectives of shareholders, employees and stakeholders, may affect whether and on what terms and conditions the Group engages in certain activities or offers certain products. Depending on their frequency and severity, these risks may interrupt or restrict the provision of services such as the Group branch or business centres or other Group services. They may also adversely affect the Group's financial condition or collateral position in relation to credit facilities extended to customers, which in turn may adversely affect the Group's Position.

23. Risks associated with lending to customers that could be directly or indirectly impacted by climate risk may adversely affect the Group's Position

The Group's most material climate risks arise from lending to business and retail customers. Customers may be affected directly by physical and transition risks. These include the effect of extreme weather events on a customer's business or property, including impacts to the cost, availability and adequacy of insurance coverage, changes to the regulatory and policy environment in which the customer operates, disruption from new technology and changes in demand towards lower carbon products and services. Climate risks may indirectly affect a customer by impacting its supply chain.

Climate risks may affect the ability of customers to repay debt, result in an increased probability of default, result in 'stranded assets', and/or impact the amount the Group is able to recover due to the value or liquidity of collateral held as security being impaired. Recent extreme weather events in Australia, such as Tropical Cyclone Alfred in 2025 and flooding in 2023, have affected customers. Similar events have occurred in New Zealand in recent years such as Cyclone Gabrielle in February 2023 and severe flooding in Auckland in January 2023.

In 2024 the Group identified insurability risk as an emerging risk to the Group and seeks to further understand the potential risks and impacts on its customers, including through progressing capability to undertake physical risk assessments for certain priority portfolios and sectors in Australia and advocating for better industry access to data to assess and manage this risk.

Risks associated with climate change are subject to increasing regulatory, political and societal focus.

Further integrating and embedding climate risk into the Group's risk management framework and adapting the Group's operations and business strategy to seek to address the risks and opportunities posed by climate change, could have a significant impact on the Group.

Risk management, internal control, non-financial and reputational risk

24. The Group's risk management framework may fail to manage all existing risks appropriately or detect new and emerging risks fast enough, which could adversely affect the Group's Position

Risk management is an important part of the Group's activities. It includes the identification, measurement, monitoring and mitigation of the Group's risk and reporting on the Group's risk profile and effectiveness of identified controls. Effectiveness of the Group's risk management framework is not fully assured. This includes effectiveness in relation to existing risks and new and emerging risks that the Group may not anticipate or identify in a timely manner and for which its controls may not be effective. Failure to manage risks effectively could adversely impact the Group's reputation or compliance with regulatory obligations.

The Group believes that having the right risk culture supports the Group in building a better organisation that effectively manages risk, safeguards the interests of its customers and delivers on its purpose and strategy. The Group has an explicit approach to the assessment of its risk culture that supports the Board in forming a view of the Group's risk culture maturity and identifying actions to be taken to attain the Board's target state. Risk culture is regularly measured and monitored with an objective to ensure the target risk culture is sustained. The risk culture maturity/target established by the Board is 'Sound'. The Group's risk culture has been assessed as 'Needs Improvement' in 2024. Regulatory concerns around the Group's Markets business and non-financial risk management (refer risk factor 17 "*Litigation and contingent liabilities may adversely affect the Group's Position*") have contributed to this re-assessment.

The Group seeks to continuously improve its risk management frameworks. It has implemented, and regularly reviews, its risk management policies and allocates additional resources across the Group to manage and mitigate risks. Such efforts may not insulate the Group from exposure to risks or give full assurance that the Group's risk management framework will be effective. A failure in the Group's risk management processes or governance could result in the Group suffering unexpected losses and reputational damage, and failing to comply with regulatory obligations, which could adversely affect the Group's Position.

25. Non-financial risk events may adversely affect the Group's Position

Non-financial risk is the risk of loss and/or non-compliance (including failure to act in accordance with laws, regulations, industry standards and codes, and internal policies) resulting from inadequate or failed internal processes, people, system and/or data, or from external events. This includes operational risk and the risk of reputation loss but excludes strategic risk.

Non-financial risk categories under the Group's risk taxonomy include:

- financial crime (the risk of money laundering, terrorism financing, sanctions violations, or bribery and corruption: including non-compliance with the Group's policies, or regulatory expectations). See risk factor 18 "*Significant fines and sanctions in the event of breaches of law or regulation relating to anti-money laundering, counter-terrorism financing, sanctions and scams may adversely affect the Group's Position*";
- internal fraud (fraud / theft attempted or perpetrated by an internal party (or parties) (e.g., a Group employee or contingent worker, including instances where an employee is acting in collusion with external parties));
- external fraud (fraud or theft attempted or perpetrated without the deliberate involvement of a Group employee or contingent worker);
- operational resilience (the risk of the Group's failure to comply with regulatory expectations for business continuity, crisis management and

business process governance and management);

- physical security (the risk of damage to the Group's physical assets);
- people (the risk of breaching employment legislation, mismanaging employee relations and failing to ensure a safe working environment);
- transaction processing and execution (failure to process, manage and execute transactions and other processes correctly and appropriately);
- technology (the risk associated with the outage of systems, including hardware, software and networks). See risk factor 29 "*Disruption of information technology systems or failure to successfully implement new technology systems could significantly interrupt the Group's business, which may adversely affect the Group's Position*";
- conduct (the risk of loss or damage arising from the failure of the Group, its employees or agents to appropriately consider the interests of consumers, the integrity of the financial markets and the expectations of the community, in conducting the Group's business activities). See risk factor 26 "*Conduct risk events may adversely affect the Group's Position*";
- legal (the risk of execution errors in legal procedures and processes);
- regulatory (the risk of failure to act in accordance with laws, regulations and regulatory expectations in the jurisdictions in which the Group operates, leading to regulatory censure or penalties). This risk includes matters such as where the Group's prudential regulator imposes requirements including capital overlays for failing to meet regulatory expectations. See risk factor 16 "*Regulatory changes or a failure to comply with laws, regulations or policies may adversely affect the Group's Position*";
- third party (the risk of failing to manage third party relationships and risks appropriately. For example, not taking reasonable steps to identify and mitigate operational risks introduced into the organisation from the use of third party products/ services);
- information security including cyber (the risk of information security incidents, including the loss and theft of data/information; this covers all types of data, (e.g., customer, employee, and the Group's proprietary data), and includes the failure to comply with rules concerning information security). See risk factor 30 "*Risks associated with information security, including cyber-attacks, may adversely affect the Group's Position*";
- data (the risk of failing to appropriately collect, use, manage, maintain, and dispose of data, including all types of data, for example, customer data, employee data, and the Group's proprietary data). See risk factor 31 "*Data management risks may adversely affect the Group's Position";*
- model (the potential for adverse consequences from model errors based on the design, development, use and/or report of a model to inform business decisions). See risk factor 32 "*Modelling risks may adversely affect the Group's Position"*; and
- statutory reporting and tax (the risk of failing to meet statutory reporting and tax filing/reporting requirements).

Loss from risk events may adversely affect the Group's Position. Such losses can include fines, penalties, imposts (including capital imposts), loss or theft of funds or assets, legal costs, customer compensation, loss of shareholder value, reputation loss, loss of life or injury to people, and loss of property and information.

Pursuant to APRA and RBNZ requirements, the Group and ANZ New Zealand Group must maintain "operational risk capital" reserves in the event future operational events occur.

As the Group increases the adoption of AI, which includes technologies such as machine learning through predictive analytics, process automation and decision generation to support its customers and business processes, the Group may become more exposed to associated AI risks, such as inaccurate decisions or unintended consequences that are inconsistent with the Group's policies or values. These could have adverse financial and non-financial impacts on the Group. See risk factor 33 "Use of AI may adversely affect the Group's Position" for further information.

26. Conduct risk events may adversely affect the Group's Position

Conduct risk is the risk of loss or damage arising from the failure of the Group, its employees or agents to appropriately consider the interests of consumers, the integrity of the financial markets, and the expectations of the community in conducting the Group's business activities.

Conduct risks include:

- the provision of unsuitable or inappropriate advice to customers;
- the representation of, or disclosure about, a product or service which is inaccurate, or does not provide adequate information about risks and benefits to customers;
- a failure to deliver product features and benefits in accordance with terms, disclosures, recommendations and advice;
- a failure to identify, manage and where appropriate avoid actual, potential and perceived conflicts of interest. The Group has procedures and controls in place to manage the Group's client interests, any misuse of confidential and inside information to the advantage of the Group, and any conflict between Group employee personal interests and the Group's interests, clients and suppliers;
- inadequate management of complaints or remediation processes;
- a failure to respect and comply with duties to customers in financial hardship; and
- unauthorised trading activities in financial markets, in breach of the Group's policies and standards.

There has been continuing regulatory and community focus on conduct risk, including in Australia and New Zealand. Divergent and uncertain economic conditions mean customers remain under financial pressure, with the higher cost-of-living and reduction in disposable income continuing to influence affordability.

This may continue to impact both the ability to lend to customers and/or the extent to which forbearance may need to be offered to those already struggling. In order to effectively manage heightened conduct risk in the current economic climate, the Group will need to continue to monitor the number of customers that may fall into financial difficulty, and therefore require enhanced support. As this occurs, it is likely to have the greatest impact on customers in challenging financial circumstances. This is an evolving situation and remains a priority for regulators. The Group will need to continue to address the demand for forbearance and provide appropriate tailored solutions to address complex customer needs to help mitigate the risk of customer harm. In response to economic challenges, regulators are intensifying their scrutiny of financial institutions to ensure conduct risk is being well managed through adherence to ethical standards and protection of consumers. This regulatory focus includes more prescriptive guidelines and more rigorous enforcement actions. This could lead to increased compliance costs and potential liability in cases of non-compliance, potentially affecting the Group’s Position.

The CoFI regime, introduced through the FMCIA Act, aims to ensure that financial institutions in New Zealand treat consumers fairly. Effective from 31 March 2025, the CoFI regime mandates that these institutions obtain a market services licence, implement a fair conduct programme, and comply with the fair conduct principle, which emphasises fairness in all consumer interactions. ANZ Bank New Zealand Limited has implemented changes to comply with these requirements, which may result in increased compliance costs, operational changes, and enhanced oversight. Furthermore, in May 2024, the New Zealand Ministry of Business, Innovation and Employment opened a consultation on a review of the CoFI requirements. Any amendments to the CoFI regime following this consultation are expected to commence in 2026 at the earliest. The impact of the CoFI regime on ANZ Bank New Zealand remains uncertain, but it could lead to increased compliance costs and potential liability in cases of non-compliance, potentially affecting the Group’s Position.

Where a conduct risk event occurs, ANZBGL has a centralised team responsible for customer remediation programs, including addressing conduct issues identified in ANZBGL reviews. Similarly, ANZ Bank New Zealand has a separate centralised customer remediation team. Conduct risk events may not only negatively impact customers and market integrity, but may expose the Group to regulatory actions, restrictions or conditions on banking licences and reputational consequences that may adversely affect the Group’s Position. Remediation programs may not be implemented appropriately or may lead to further remediation work being required, resulting in litigation, regulatory action and increasing cost to the Group, which may adversely affect the Group’s Position. For further discussion of the increasing regulatory focus on conduct risk, see risk factor 16 “*Regulatory changes or a failure to comply with laws, regulations or policies may adversely affect the Group’s Position” and risk factor 17 “Litigation and contingent liabilities may adversely affect the Group’s Position*”.

27. Human capital risk, which relates to the inability to attract, develop, motivate and retain the Group’s people to meet current and future business needs, could result in poor financial and customer outcomes and reduce the ability of the Group to deliver against customer and other stakeholders’ expectations

Key executives, employees and directors play an integral role in the operation of the Group's business and its pursuit of its strategic objectives. The unexpected departure of an individual in a key role or the Group's failure to recruit, develop and retain an appropriately skilled and qualified person into these roles particularly in areas such as digital, technology, risk or compliance, could have an adverse effect on the Group’s Position.

28. Reputational risk events as well as operational failures and regulatory compliance failures may give rise to reputational risk, which may undermine the trust of stakeholders, erode the Group’s brand and adversely affect the Group’s Position

The Group’s reputation is a valuable asset and a key contributor to the support that it receives from the community in respect of its business initiatives and its ability to raise funding or capital. Reputational risk may arise as a result of an external event or the Group’s actual or perceived actions and practices, which include operational and regulatory compliance failures. The occurrence of such events may adversely affect perceptions about the Group held by the public (including the Group’s customers), shareholders, investors, regulators and rating agencies. The impact of a risk event on the Group’s reputation may exceed any direct cost of the risk event itself and may adversely impact the Group’s Position.

The Group may suffer reputational damage where one of its practices fails to meet community expectations. Community expectations are continually changing and evolving. If expectations exceed the standard required to comply with applicable law, the Group may incur reputational damage even where it has met its legal obligations.

A divergence between community expectations and the Group’s practices could arise in a number of ways including in relation to its product and services disclosure practices, pricing policies and use of data. The Group’s reputation may be adversely affected by community perception of the broader financial services industry, particularly in an environment of elevated interest rates. Reputational damage may arise from the Group’s failure to effectively manage risks, enforcement or supervisory action by regulators, adverse findings from regulatory reviews and failure or perceived failure to adequately respond to community, environmental and ethical issues. From time to time the Group may be subjected to heightened public scrutiny and potential reputational damage as a result of the actions of activist shareholders. Areas which have attracted investor activism in Australia primarily relate to environmental and social issues and include concerns about the actions of the Group itself or parties that the Group finances.

Operational and regulatory compliance failures or perceived failures may give rise to reputational risk. Such operational and regulatory compliance failures include, but are not limited to:

- failures related to fulfilment of identification of obligations;
- failures related to new product development;
- failures related to ongoing product monitoring activities;
- failures related to suitability requirements when products are sold outside of the target market;
- failure to comply with disclosure obligations;
- failure to properly manage risk (e.g., credit, market, operational or compliance);
- market manipulation or anti-competitive behaviour;
- inappropriate crisis management/response to a crisis event;

- inappropriate handling of customer complaints;
- inappropriate third party arrangements;
- privacy breaches; and
- unexpected risks.

Damage to the Group's reputation may have wide-ranging impacts, including adverse effects on the Group's profitability, capacity and cost of funding, increased regulatory scrutiny, regulatory enforcement actions, additional legal risks and limiting the availability of new business opportunities. The Group's ability to attract and retain customers could also be adversely affected if the Group's reputation is damaged, which may adversely affect the Group's Position.

29. Disruption of information technology systems or failure to successfully implement new technology systems could significantly interrupt the Group's business, which may adversely affect the Group's Position

The Group's day-to-day operations and its service offerings (including digital banking) are highly dependent on information technology ("**IT**") systems including systems maintained/provided by third parties. In a digital world, customer's expectations of "always on" "24/7" banking services necessitates highly available and resilient IT systems. Disruption of IT systems that support critical operations may result in the Group failing to meet its compliance obligations and customers' banking needs. Disruption of IT systems can be unpredictable and can arise from numerous sources, not all of which are fully within the Group's control. These include, among others, operational or execution failures or deficiencies by third parties and third parties that maintain/provide IT systems to the Group; accidental system or technological failure; electrical or telecommunication outages; and failures of computer servers or infrastructure.

The Group has an ongoing obligation to maintain its IT systems and to identify, assess and respond to risk exposures associated with these systems, including IT asset lifecycle, IT asset project delivery, technology resilience, technology security, use of third parties, data retention and restoration and business rules and automation. Inadequate responses to these risk exposures could lead to unstable or insecure systems, which could adversely impact customers, increase the Group's costs, and result in non-compliance with regulatory requirements, any of which may adversely affect the Group's Position.

The Group has incident response, disaster recovery and business continuity measures in place designed to ensure that critical IT systems will continue to operate during both short-term and prolonged disruption events for all businesses across the Group's network, including ANZ Bank New Zealand Limited and international branches, which rely on the Group to provide a number of IT systems. The ever- changing external threat environment necessitates that these capabilities must cater for profound and complex events. A failure of the Group's systems may affect the Group's network, which may in turn, adversely affect the Group's Position.

The Group must implement and integrate new IT systems and capabilities, most notably cloud, data, AI and automation technologies, into the existing technology landscape to ensure that the Group's technology environment is cost-effective and can support evolving customer requirements. Inadequate implementation and integration of these systems and capabilities, or improper operation and management, including of their vendors and the supply chain, may adversely affect the Group's Position.

This risk factor should be read in conjunction with risk factor *30 "Risks associated with information security, including cyber-attacks, may adversely affect the Group's Position*" as information security breaches and cyber-attacks have the potential to result in the disruption of IT systems.

30. Risks associated with information security, including cyber-attacks, may adversely affect the Group's Position

The digital world is constantly evolving, with both positive innovation and new threats. As a result, the Group recognises that the risk of a cyber event or data loss remains a significant concern for its businesses. Cyber threats continue to increase in sophistication, persistence, scale, frequency and impact. Threats include but are not limited to: business email compromise, ransomware, distributed denial of service, data breaches, third-party exposures, software vulnerabilities, AI weaponisation, geopolitically motivated cyber espionage and destructive attacks.

Cyber-attacks have the potential to cause financial system instability and could result in serious disruption to customer banking services or compromise customer data privacy. As both the scale and complexity of such attacks are increasing, there is always a risk that countermeasures and layers of defence to adequately mitigate risks may not be sufficient and that sensitive information may be inadvertently exposed.

The Group has noted increased external occurrences of ransomware and third-party data breaches, ongoing volatility in the global political landscape and the security implications of wide-spread adoption of AI. Although AI has potential to support significant service advances for customers, it also has potential to assist, enable and enhance existing methods for criminals to perpetrate fraud, scams, and cyber threats against the Group and its customers, and poses increased risks to cybersecurity, including risks of denial of service, the criminal use of deepfakes, and more sophisticated social engineering attacks. Further, inadvertent disclosure or misuse of client data in the datasets or algorithms may lead to reputational risk. See risk factor 33 "Use of AI may adversely affect the Group's Position" for further information.

Intense public response to cyber-attacks has led to increased political focus with the potential for future significant increases in penalties for privacy breaches. Should the Group be the target of such an attack, then in addition to the risks discussed above, there is a risk of reputational damage in light of the public response to such an attack and/or penalties imposed by a regulator, which may materially adversely affect the Group's operations. The regulatory landscape is also evolving with additional local and international regulator focus on information security, including the release of the 2023-2030 Australian Cyber Security Strategy and subsequent discussions, consultation and implementation on legislative reforms.

A focus on information security is key to protecting the confidentiality, integrity or availability of systems and data. The Group as part of its global banking operations handles and stores a considerable amount of personal and confidential information about its customers and its own internal processes, across the multiple geographies in which the Group operates. This information is processed and stored on both internal and third-party hosted environments. As such, weaknesses in key security policies or controls operated by the Group or third parties engaged by the Group could result in the loss of data or other personal or sensitive information and adversely affect the Group's business by resulting in financial losses (including costs relating to notifying and compensating customers), regulatory investigations, sanctions or reputational harm, thus affecting the Group's Position.

31. Data management risks may adversely affect the Group's Position

Data management refers to a set of processes and procedures used to manage data, such as operational data, customer data, employee data and the Group's proprietary data. Specifically, the development, execution and oversight of plans, policies and practices that deliver, control, protect and enhance the value of the Group's data and information assets through their lifecycles. Data management risk is the risk of failing to achieve these objectives.

Deficiencies in data management can be attributed to: data captured, produced or processed does not meet data quality requirements, is unavailable or is not fit for purpose; data ownership accountabilities are not adequately executed upon; data integrity is not preserved throughout the data lifecycle; context and meaning of the data are not sufficiently understood, because the data is not clearly articulated, categorised and/or classified; critical data has inadequate controls in place, has not been adequately identified, or does not meet data quality and data lineage requirements; and data quality issues are not detected and responded to in a timely manner.

Deficiencies in data management can result in ineffective risk management practices and inaccurate risk reporting. In addition, failure to comply with data management obligations, including regulatory obligations may cause the Group to incur losses or result in regulatory action, which may adversely impact the Group's Position.

32. Modelling risks may adversely affect the Group's Position

The Group relies on a number of models for material business decision making including but not limited to lending decisions, calculating capital requirements, provision levels, customer compensation payments and stressing exposures. If the models prove to be inadequately designed, implemented, used or maintained or if they are based on incorrect assumptions or inputs, this may adversely impact the Group's Position.

33. Use of AI may adversely affect the Group's Position

AI refers to the development of systems capable of performing tasks that typically require human intelligence, such as learning, reasoning, and decision making. AI is increasingly being used to drive innovation and efficiency in the Group's business processes. Adopting AI is also important in delivering the Group's strategy and maintaining competitiveness.

However, as AI becomes more integrated into the Group and the regulatory landscape relating to AI continues to rapidly evolve, inadequate management and governance of responsible AI use, whether by the Group or by third parties, can lead to significant operational risks, including (but not limited to) the following:

- AI Bias: Systematic and repeatable errors in the way an AI system operates, which could result in unfair outcomes.
- AI Discrimination: AI system treats individuals or groups unfairly or differently based on protected attributes.
- AI Hallucinations: AI model perceives patterns or objects that are nonexistent, creating nonsensical or inaccurate outputs.
- AI Washing: Deceptive promotional practice that exaggerates or outright lies about a product or service's use of AI.
- Data Poisoning: Deliberate and malicious contamination of data to compromise the performance of AI and machine learning.
- Immature AI Technology: Critical infrastructure failure, poor performance, processing failure.
- Model Drift: Decline in a model's ability to make accurate predictions due to changes in the environment in which it is being used.
- Model Extraction / Stealing: Malicious actor providing inputs to an AI system and using the outputs to create an approximate replica of it.
- Runaway AI: AI system gains the ability to improve itself rapidly and autonomously, potentially leading to outcomes that were not intended or foreseen by its creators.
- Shadow AI: Unsanctioned or ad-hoc generative AI use within an organisation that is not governed.

AI is an emerging risk that the Group seeks to understand further. Failure to appropriately manage these risks in AI adoption and use may erode customer trust, result in legal or regulatory non-compliance, and damage the Group's reputation.

CURRENCY OF PRESENTATION AND EXCHANGE RATES

Currency of presentation

The Group publishes consolidated financial statements in Australian Dollars. In this U.S. Disclosure Document, unless otherwise stated or the context otherwise requires, references to "US$", "USD" and "U.S. dollars" are to U.S. Dollars and references to "$", "AUD" and "A$" are to Australian Dollars. For the convenience of the reader, this U.S. Disclosure Document contains translations of certain Australian Dollar amounts into U.S. Dollars at specified rates. These translations should not be construed as representations that the Australian Dollar amounts actually represent such U.S. Dollar amounts or could be converted into U.S. Dollars at the rate indicated. Unless otherwise stated, the translations of Australian Dollars into U.S. Dollars have been made at the rate of US$0.6236 = A$1.00, the Noon Buying Rate on 31 March 2025.

Major exchange rates

The major exchange rates used by the Group to translate the results of foreign subsidiaries, branches, investments in associates and issued debt to Australian Dollars were as follows:

	Balance Sheet			Profit & Loss Average		
	As at			Half Year		
	Mar 25	Sep 24	Mar 24	**Mar 25**	Sep 24	Mar 24
Chinese Renminbi	**4.5563**	4.8622	4.7035	**4.6270**	4.7862	4.7167
Euro	**0.5796**	0.6209	0.6040	**0.6040**	0.6110	0.6054
Pound Sterling	**0.4848**	0.5178	0.5157	**0.5037**	0.5188	0.5216
Indian Rupee	**53.803**	58.086	54.256	**54.706**	55.535	54.403
Indonesian Rupiah	**10,401**	10,493	10,331	**10,287**	10,603	10,235
Japanese Yen	**93.650**	98.272	98.515	**97.502**	101.163	96.880
Malaysian Ringgit	**2.7853**	2.8468	3.0773	**2.8297**	3.0471	3.0822
New Taiwan Dollar	**20.870**	21.938	20.829	**20.863**	21.481	20.702
New Zealand Dollar	**1.1000**	1.0882	1.0903	**1.1044**	1.0929	1.0761
Papua New Guinean Kina	**2.5497**	2.7165	2.4549	**2.5530**	2.5569	2.4413
United States Dollar	**0.6283**	0.6933	0.6508	**0.6396**	0.6644	0.6543

For the March 2025 half, 37% of the Group's operating income was derived from the New Zealand and Rest of World geographic regions (Sep 24 half: 36%; Mar 24 half: 39%).

Operating income from the New Zealand and Rest of World geographic regions is denominated principally in the currencies outlined in the table above. Movements in foreign currencies against the Australian Dollar can therefore affect the Group's earnings through the translation of overseas profits to Australian Dollars. Movements in the major exchange rates used by the Group to translate the results of foreign subsidiaries, investments in associates and issued debt to Australian Dollars were as follows:

Australian Dollar movement against foreign currencies[1]

	Movement		
Half year ended	**Mar 25**	**Sep 24**	**Mar 24**
Chinese Renminbi	**-3%**	1%	0%
Euro	**-1%**	1%	0%
Pound Sterling	**-3%**	-1%	-1%
Indian Rupee	**-1%**	2%	0%
Indonesian Rupiah	**-3%**	4%	3%
Japanese Yen	**-4%**	4%	4%
Malaysian Ringgit	**-7%**	-1%	2%
New Taiwan Dollar	**1%**	4%	0%
New Zealand Dollar	**0%**	2%	3%
Papua New Guinean Kina	**-3%**	5%	-1%
United States Dollar	**-4%**	2%	-1%

1. *Movement is based on comparison of the half year average exchange rate to the immediately preceding half year average exchange rate.*

The Group monitors its exposure to revenues, expenses and invested capital denominated in currencies other than Australian Dollars as these expose the Group to the risk of changes in foreign exchange rates. Variation in the value of these foreign operations arising as a result of exchange differences are reflected in the foreign currency translation reserve in equity. These currency exposures are managed in accordance with established risk management policies.

Where it is considered appropriate, the Group takes out economic hedges against larger foreign exchange denominated revenue streams (primarily New Zealand Dollar, U.S. Dollar and U.S. Dollar correlated). The primary objective of hedging is to ensure that, if practical, the consolidated capital ratios are neutral to the effects of changes in exchange rates.

OPERATING AND FINANCIAL REVIEW

The following discussion is based on the Condensed Consolidated Financial Statements (attached to this U.S. Disclosure Document as the Annex) prepared under AASs (refer to "Section 1: Key Information - Basis of Preparation" for a description of AASs).

The Group's results for the past three half years are summarised below and are also discussed under the headings of "Analysis of major income and expense items" and "Results by division", which follow.

CONDENSED CONSOLIDATED INCOME STATEMENT INFORMATION

	Half Year		
	Mar 25 $M	**Sep 24 $M**	**Mar 24 $M**
Net interest income	**8,838**	8,137	7,900
Other operating income	**2,315**	2,236	2,248
Operating income	**11,153**	10,373	10,148
Operating expenses	**(5,788)**	(5,490)	(5,179)
Profit before credit impairment and income tax	**5,365**	4,883	4,969
Credit impairment (charge)/release	**(143)**	(336)	(70)
Profit before income tax	**5,222**	4,547	4,899
Income tax expense	**(1,538)**	(1,381)	(1,435)
Non-controlling interests	**(21)**	(21)	(14)
Profit attributable to shareholders of the Company	**3,663**	3,145	3,450

Group results

Comparison of March 2025 with March 2024

Profit increased $213 million (6%) compared with the March 2024 half mainly due to:

- Net interest income increased $938 million (12%) driven by a $126.5 billion increase in average interest earning assets with net interest margin remaining flat. The increase in average interest earning assets was driven by the impact of Suncorp Bank acquisition, higher average net loans and advances and investment securities. The net interest margin remained flat at 155 bps as decrease driven by deposit pricing competition in the New Zealand division, higher wholesale funding costs, unfavourable assets and funding mix, asset pricing competition in the Australia Retail, Australia Commercial and Institutional (excluding Markets business unit) divisions, and customer remediation was offset by higher earnings on replicating portfolio, impact of Markets and treasury activities, and the impact of Suncorp Bank acquisition. Refer to "Analysis of Major Income and Expense Items" on pages 45 and 46 for further details on key movements.

- Other operating income increased $67 million (3%). Excluding the impact of Suncorp Bank acquisition, Other operating income increased $33 million (1%) driven by net favourable unrealised mark-to-market movements on economic hedges and revenue and expense hedges ($382 million), higher realised gains on economic hedges against foreign currency denominated revenue streams offsetting net unfavourable foreign currency translations elsewhere in the Group ($45 million) and a loss on disposal of investment in AMMB Holdings Berhad ("AmBank") in the March 2024 half ($21 million). This was partially offset by lower Markets other operating income ($285 million) reflecting a less favourable external trading environment, lower net fee and commission income ($87 million) from lower non-lending fees in the Institutional (excluding Markets business unit) and New Zealand divisions and higher customer remediation in the Australia Retail division, and a decrease in share of associates' profit ($42 million), following disposal of AmBank in the March 2024 half. Refer to "Analysis of Major Income and Expense Items" on pages 47 to 48 for further details on key movements.

- Operating expenses increased $609 million (12%). Excluding the impact of Suncorp Bank acquisition, which included an $82 million charge relating to amortisation of acquired intangible assets, Operating expenses increased $94 million (2%) driven by higher other expenses ($97 million) from higher investment spend, higher technology expenses ($39 million) from inflationary impacts partially offset by technology simplification benefits, and higher personnel expenses ($21 million) from inflationary impacts on wages partially offset by benefits from productivity initiatives. This was partially offset by lower restructuring expenses ($58 million) from reduction in operational changes across the Group. Refer to "Analysis of Major Income and Expense Items" on page 49 for further details on key movements.

- Credit impairment charge increased $73 million. Excluding the impact of Suncorp Bank acquisition, credit impairment charge increased $62 million (89%) driven by an increase in the individually assessed credit impairment charge ($105 million), partially offset by lower collectively assessed credit impairment charge ($43 million). Refer to "Analysis of Major Income and Expense Items" on pages 50 to 52 for further details on key movements.

Comparison of March 2025 with September 2024

Profit increased $518 million (16%) compared with the September 2024 half mainly due to:

- Net interest income increased $701 million (9%) driven by a $110.5 billion increase in average interest earning assets, partially offset by a 3 bps decrease in net interest margin from 158 bps to 155 bps. The increase in average interest earning assets was driven by the impact of Suncorp Bank acquisition part way through the September 2024 half, higher average cash and other liquid assets, net loans and advances and investment securities. The net interest margin decreased driven by higher wholesale funding cost, impact of Markets and treasury activities, deposit pricing competition in the New Zealand division, unfavourable assets and funding mix and customer remediation. This was partially offset by higher earnings on replicating portfolio, and the impact of Suncorp Bank acquisition part way through the September 2024 half. Refer to “Analysis of Major Income and Expense Items” on pages 45 and 46 for further details on key movements.

- Other operating income increased $79 million (4%). Excluding the impact of Suncorp Bank acquired part way through the September 2024 half, Other operating income increased $52 million (2%), driven by net favourable unrealised mark-to-market movements on economic hedges and revenue and expense hedges ($241 million), higher realised gains on economic hedges against foreign currency denominated revenue streams offsetting net unfavourable foreign currency translations elsewhere in the Group ($23 million), higher share of associates’ profit ($16 million) and gain from recycling of foreign currency translation reserve from other comprehensive income to profit or loss on dissolution of international entities ($13 million). This was partially offset by lower net fee and commission income ($115 million) from lower cards revenue due to timing of card incentives in the Australia Retail division and lower non-lending fees in the Institutional (excluding Markets business unit) division, lower Markets other operating income ($48 million), lower income from non-recurring items in the September 2024 half ($46 million) including release of excess provisions following a legal settlement and a dividend from Bank of Tianjin, and lower insurance-related income ($28 million) in the Australia Retail division. Refer to “Analysis of Major Income and Expense Items” on pages 47 to 48 for further details on key movements.

- Operating expenses increased $298 million (5%). Excluding the impact of Suncorp Bank acquired part way through the September 2024 half, which included an $82 million charge relating to amortisation of acquired intangible assets, Operating expenses decreased $29 million (1%) driven by lower other expenses ($56 million) from investment spend seasonality, and lower restructuring expenses ($11 million) from reduction in operational changes across the Group. This was partially offset by higher personnel expenses ($44 million) from inflationary impacts on wages partially offset by benefits from productivity initiatives. Refer to “Analysis of Major Income and Expense Items” on page 49 for further details on key movements.

- Credit impairment charge decreased $193 million (57%). Excluding the impact of Suncorp Bank acquired part way through the September 2024 half which included a $244 million acquisition related adjustment, credit impairment charge increased $39 million driven by an increase in individually assessed credit impairment charge. Refer to “Analysis of Major Income and Expense Items” on pages 50 to 52 for further details on key movements.

ANALYSIS OF MAJOR INCOME AND EXPENSE ITEMS

Net interest income

The following tables summarise net interest income, net interest margin, average interest earning assets and average deposits and other borrowings for the Group and for the Australia Retail, Australia Commercial, Institutional (excluding Markets business unit), New Zealand and Suncorp Bank divisions.

	Half Year		
Group	**Mar 25 $M**	**Sep 24 $M**	**Mar 24 $M**
Net interest income[1]	**8,838**	8,137	7,900
Average interest earning assets[2]	**1,142,805**	1,032,302	1,016,258
Average deposits and other borrowings[2]	**957,550**	859,459	860,229
Net interest margin (%)	**1.55**	1.58	1.55

	Half Year		
Net interest margin by major divisions	**Mar 25 $M**	**Sep 24 $M**	**Mar 24 $M**
Australia Retail			
Net interest margin (%)	**1.84**	1.89	1.94
Average interest earning assets[2]	**282,858**	277,098	269,406
Average deposits and other borrowings[2]	**180,088**	174,248	168,912
Australia Commercial[3]			
Net interest margin (%)	**2.53**	2.59	2.60
Average interest earning assets[2]	**65,943**	65,482	63,623
Average deposits and other borrowings[2]	**120,150**	116,314	115,357
Institutional (excl. Markets business unit)			
Net interest margin (%)[4]	**2.24**	2.36	2.39
Average interest earning assets[2]	**174,548**	162,905	162,856
Average deposits and other borrowings[2]	**164,903**	162,563	159,851
New Zealand			
Net interest margin (%)	**2.60**	2.57	2.56
Average interest earning assets[2]	**122,635**	122,283	122,613
Average deposits and other borrowings[2]	**105,628**	105,751	106,417
Suncorp Bank			
Net interest margin (%)	**2.12**	1.93	-
Average interest earning assets[2,5]	**77,792**	26,023	-
Average deposits and other borrowings[2,5]	**62,837**	20,976	-

1. *Includes the Major Bank Levy of -$220 million for the March 2025 half (Sep 24 half: -$197 million; Mar 24 half: -$192 million).*
2. *Averages are calculated using predominantly daily averages.*
3. *Australia Commercial division generates positive net interest income from surplus deposits held. Accordingly, $60.1 billion of average deposits for the March 2025 half (Sep 24 half: $57.0 billion; Mar 24: $58.1 billion) have been included with average net interest earning assets for the net interest margin calculation to align with internal management reporting view.*
4. *Net interest margin for the Institutional division including the Markets business unit was 0.76% for the March 2025 half (Sep 24 half: 0.74%; Mar 24 half: 0.76%).*
5. *September 2024 half was based on 2 months of balances from the date of acquisition.*

Comparison of March 2025 with March 2024

The increase in net interest income of $938 million (12%) was driven by:

Net interest margin (0 bps)

- Assets pricing (-1 bps): driven by pricing competition in the Australia Retail, Australia Commercial and Institutional (excluding Markets business unit) divisions, partially offset by favourable home loan lending margin in the New Zealand division.
- Deposits pricing (-3 bps): driven by pricing competition in the New Zealand division.
- Wholesale funding (-2 bps): driven by higher funding volumes and funding spreads.
- Assets and funding mix (-2 bps): driven by unfavourable deposit mix with a shift towards lower margin term deposits, and higher lending growth in the Institutional (excluding Markets business unit) division relative to other divisions.
- Capital and replicating portfolio (+2 bps): driven by higher interest rates, partially offset by lower volumes, and reduction in capital due to the completion of Suncorp Bank acquisition and share buy-back.
- Markets and treasury activities and other (+6 bps): driven by favourable impact from Suncorp Bank acquisition, lower funding costs and portfolio mix benefits, partially offset by higher customer remediation.

Average interest earning assets

Average interest earning assets increased $126.5 billion (12%) driven by:

- Average net loans and advances increased $98.6 billion (15%) driven by the impact of Suncorp Bank acquisition and lending growth across the Australia Retail and Institutional divisions, partially offset by the impact of foreign currency translation.
- Average trading assets and investment securities increased $35.2 billion (23%) driven by higher investment securities in Markets and the impact of Suncorp Bank acquisition.
- Average cash and other liquid assets decreased $7.2 billion (4%) driven by lower central bank term funding held following the maturity of the TFF, partially offset by higher short-dated reverse repurchase agreements and higher settlement balances.

Average deposits and other borrowings

- Average deposits and other borrowings increased $97.3 billion (11%) driven by the impact of Suncorp Bank acquisition, growth in at-call and term deposits and increases in repurchase agreements and commercial paper, partially offset by a decrease in certificates of deposit and the impact of foreign currency translation.

Comparison of March 2025 with September 2024

The increase in net interest income of $701 million (9%) was driven by:

Net interest margin (-3 bps)

- Assets pricing (0 bps): pricing competition in the Australia Retail, Australia Commercial and Institutional (excluding Markets business unit) divisions, offset by favourable home loan lending margin in the New Zealand division.
- Deposits pricing (-1 bps): driven by pricing competition in the New Zealand division, partially offset by margin improvement in the Australia Retail division.
- Wholesale funding (-2 bps): driven by higher funding volumes and funding spreads.
- Assets and funding mix (-1 bps): driven by higher lending growth in the Institutional (excluding Markets business unit) division relative to other divisions.
- Capital and replicating portfolio (+1 bps): driven by higher interest rates, partially offset by lower volumes.
- Markets and treasury activities and other (0 bps): favourable impact from the impact of Suncorp Bank acquisition part way through the September 2024 half was offset by growth in lower-yielding liquid assets and higher customer remediation.

Average interest earning assets

Average interest earning assets increased $110.5 billion (11%) driven by:

- Average net loans and advances increased $63.2 billion (9%) driven by driven by the impact of Suncorp Bank acquisition part way through the September 2024 half, lending growth across the Institutional and Australia Retail divisions and the impact of foreign currency translation.
- Average cash and other liquid assets increased $33.5 billion (21%) driven by higher central bank balances, short-dated reverse repurchase agreements and settlement balances.
- Average trading assets and investment securities increased $13.8 billion (8%) driven by the impact of Suncorp Bank acquisition part way through the September 2024 half and higher investment securities in Markets.

Average deposits and other borrowings

- Average deposits and other borrowings increased $98.1 billion (11%) driven by the impact of Suncorp Bank acquisition part way through the September 2024 half, growth in at-call deposits and term deposits, increases in repurchase agreements and commercial paper and the impact of foreign currency translation. This was partially offset by a decrease in certificates of deposit.

Other operating income

	Half Year		
	Mar 25 $M	Sep 24 $M	Mar 24 $M
Net fee and commission income[1]	**844**	944	910
Markets other operating income	**991**	1,039	1,276
Economic hedges[2]	**236**	(91)	(277)
Revenue and expense hedges[3]	**(52)**	31	75
Other[1,4,5]	**296**	313	264
Total other operating income	**2,315**	2,236	2,248

1. *Excludes the Markets business unit.*
2. *Represents unrealised gains and losses on economic hedges used to manage interest rate and foreign exchange risk and the ineffective portion of designated accounting hedges.*
3. *Represents unrealised gains and losses on revenue and expense hedges used to hedge large foreign exchange currency denominated revenue and expense streams.*
4. *Includes foreign exchange earnings and net income from insurance business.*
5. *Includes share of associates' profit/(loss) of $54 million for the March 2025 half (Sep 24 half: $38 million; Mar 24 half: $96 million).*

The Markets business unit is managed on a total revenue basis, with volatility in the Net interest income component not being a true reflection of overall return for the business. Markets Net interest income and Other operating income are summarised in the table below with corresponding commentaries provided on total Markets income basis.

	Half Year		
Markets income	Mar 25 $M	Sep 24 $M	Mar 24 $M
Net interest income[1]	**82**	(67)	(64)
Other operating income[1]	**991**	1,039	1,276
Total Markets income	**1,073**	972	1,212

1. *Net interest income includes funding costs in the Franchise trading book, primarily on commodity assets, where the related revenue is recognised as Other operating income.*

Comparison of March 2025 with March 2024

Other operating income increased $67 million (3%). Excluding Suncorp Bank, Other operating income increased $33 million (1%). Key factors affecting the result were:

Net fee and commission income

Net fee and commission income decreased $66 million (7%) driven by:

- $32 million decrease in the Australia Retail division driven by higher customer remediation.
- $30 million decrease in the Institutional division (excluding Markets business unit) driven by lower non-lending fees in Corporate Finance.
- $14 million decrease in the New Zealand division driven by lower non-lending fees.
- $21 million increase from the impact of Suncorp Bank acquisition.

Markets income

Markets income decreased $139 million (11%) with a $285 million decrease in Other operating income, partially offset by a $146 million increase in Net interest income. The net $139 million decrease was attributable to the following business activities:

- $119 million decrease in Franchise Revenue across all business lines amid more challenging trading conditions. Commodities revenue decreased due to varied trading conditions in precious metals. Foreign Exchange revenues decreased as higher customer activity was more than offset by lower trading gains in the context of market uncertainty. Rates revenue decreased due to more challenging trading conditions in international markets. Credit and Capital Markets revenue decreased as market participants considered the potential for credit spreads to widen, partially offset by sustained customer issuance activity.
- $37 million decrease in Derivative valuation adjustments revenue driven by lower gains (net of hedges) from credit and funding spread movements.
- $17 million increase in Balance Sheet revenues from higher average levels of investment securities and increased yields, partially offset by fewer short-term interest rate changes.

Economic hedges

Economic hedges income increased $513 million driven by:

- For the March 2025 half, gains on economic hedges related to funding-related swaps, principally from strengthening of the USD against the AUD and NZD, partially offset by the narrowing of USD/AUD currency basis spreads.
- For the March 2024 half, losses on economic hedges related to funding-related swaps, principally from narrowing USD/EUR currency basis spreads. Further losses were driven by the yield curve movement impact on net pay fixed economic hedge positions.

Revenue and expense hedges

Revenue and expense hedges income decreased $127 million driven by:

- For the March 2025 half, the loss on revenue and expense hedges was driven by the depreciation of AUD against the USD, partially offset by gains from appreciation of the AUD against NZD.
- For the March 2024 half, the gain on revenue and expense hedges was mainly due to the appreciation of AUD against the NZD.

Other

Other income increased $32 million (12%) driven by:

- $16 million increase in the Group Centre division driven by:
  - $45 million increase from higher realised gains on economic hedges against foreign currency denominated revenue streams offsetting net unfavourable foreign currency translations elsewhere in the Group,
  - $21 million increase from a loss on disposal of investment in AMMB Holdings Berhad (AmBank) in the March 2024 half,
  - $42 million decrease in share of associates' profit/(loss) driven by the loss of equity accounted earnings following the disposal of AmBank ($65 million), partially offset by an increase in P.T. Bank Pan Indonesia (Panin) ($23 million).
- $14 million increase in the Institutional (excluding Markets business unit) division predominantly driven by higher foreign exchange-related earnings in Transaction Banking, Corporate Finance and Central Functions.
- $9 million increase from the impact of Suncorp Bank acquisition.

Comparison of March 2025 with September 2024

Other operating income increased by $79 million (4%). Excluding Suncorp Bank, Other operating income increased $52 million (2%). Key factors affecting the result were:

Net fee and commission income

Net fee and commission income decreased $100 million (11%) driven by:

- $69 million decrease in the Australia Retail division driven by lower cards revenue due to timing of cards incentives.
- $32 million decrease in the Institutional division (excluding Markets business unit) driven by lower non-lending fees in Corporate Finance.
- $16 million decrease in the Australia Commercial division driven by lower cards revenue due to seasonality of fees and lower non-lending fees.
- $15 million increase from impact of Suncorp Bank acquisition part way through the September 2024 half.

Markets income

Markets income increased $101 million (10%) with a $149 million increase in Net interest income partially offset by a $48 million decrease in Other operating income. The net $101 million increase was attributable to the following business activities:

- $69 million increase in Franchise Revenue driven by Rates, Foreign Exchange and Commodities, partially offset by Credit and Capital Markets. Rates revenue increased driven by higher customer demand for hedging and financing solutions. Foreign Exchange revenue increased due to higher volatility resulting in higher customer demand. Commodities revenue increased, capitalising on physical commodity management capabilities in the context of tariff uncertainty. This was partially offset by Credit and Capital Markets as market participants considered the potential for credit spreads to widen, partially offset by sustained customer issuance activity.
- $54 million increase in Balance Sheet revenues from higher average levels of investment securities and increased yields.
- $22 million decrease in Derivative valuation adjustments revenue driven by lower gains (net of hedges) from credit and funding spread movements.

Economic hedges

Economic hedges income increased $327 million driven by:

- For the March 2025 half, gains on economic hedges related to funding-related swaps, principally from strengthening of the USD against the AUD and NZD, partially offset by the narrowing of USD/AUD currency basis spreads.
- For the September 2024 half, losses on economic hedges related to funding-related swaps, principally from the weakening of the USD and EUR against the AUD and NZD. Further losses were driven by the impact of falling NZD yield curves on net pay fixed economic hedge positions.

Revenue and expense hedges

Revenue and expense hedges income decreased $83 million driven by:

- For the March 2025 half, the loss on revenue and expense hedges was driven by the depreciation of AUD against the USD, partially offset by gains from appreciation of the AUD against NZD.
- For the September 2024 half, the gain on revenue and expense hedges was mainly due to the weakening of the USD against AUD.

Other

Other income decreased $17 million (5%) driven by:

- $28 million decrease in the Australia Retail division due to lower insurance-related income.
- $9 million increase from the impact of Suncorp Bank acquisition part way through the September 2024 half.
- $2 million increase in the Group Centre division driven by:
  - $23 million increase from higher realised gains on economic hedges against foreign currency denominated revenue streams offsetting net unfavourable foreign currency translations elsewhere in the Group.
  - $17 million increase from higher share of associates' profit in Panin.
  - $13 million increase from higher gain on recycling of foreign currency translation reserve from other comprehensive income to profit or loss on dissolution of international entities.
  - $46 million decrease from non-recurring items in the September 2024 half, including release of excess provisions following a legal settlement and a dividend from Bank of Tianjin.

Operating expenses

	Half Year		
	Mar 25 $M	**Sep 24 $M**	**Mar 24 $M**
Personnel	**3,292**	3,098	3,042
Premises	**361**	350	338
Technology	**1,043**	1,008	886
Restructuring	**83**	94	141
Other	**1,009**	940	772
Total operating expenses	**5,788**	5,490	5,179
Total full time equivalent staff	**42,898**	42,142	40,041
Average full time equivalent staff	**42,379**	40,589	40,168

Comparison of March 2025 with March 2024

Operating expenses increased by $609 million (12%). Excluding Suncorp Bank, Operating expenses increased $94 million (2%).

- Personnel expenses increased $250 million (8%) driven by the impact of Suncorp Bank acquisition ($229 million), and inflationary impacts on wages, partially offset by benefits from productivity initiatives.
- Premises expenses increased $23 million (7%) driven by the impact of Suncorp Bank acquisition ($28 million).
- Technology expenses increased $157 million (18%) driven by the impact of Suncorp Bank acquisition ($118 million), higher software licence costs and inflationary impacts on vendor costs. This was partially offset by benefits from technology simplification.
- Restructuring expenses decreased $58 million (41%) driven by reduction in operational changes across the Group.
- Other expenses increased $237 million (31%) driven by the impact of Suncorp Bank acquisition ($140 million), which included the amortisation of acquired intangible assets of $82 million, and higher investment spend.

Comparison of March 2025 with September 2024

Operating expenses increased by $298 million (5%). Excluding Suncorp Bank, Operating expenses decreased $29 million (1%).

- Personnel expenses increased $194 million (6%) driven by the impact of Suncorp Bank acquisition part way through the September 2024 half ($150 million), and inflationary impacts on wages, partially offset by productivity initiatives.
- Premises expenses increased $11 million (3%) driven by the impact of Suncorp Bank acquisition part way through the September 2024 half ($19 million).
- Technology expenses increased $35 million (4%) driven by the impact of Suncorp Bank acquisition part way through the September 2024 half ($33 million), and inflationary impacts on vendor costs, partially offset by investment spend seasonality and productivity initiatives.
- Restructuring expenses decreased $11 million (12%) driven by reduction in operational changes across the Group.
- Other expenses increased $69 million (7%) driven by the impact of Suncorp Bank acquisition part way through the September 2024 half ($125 million), which included the amortisation of acquired intangible assets of $82 million, partially offset by investment spend seasonality.

Credit risk

The Group's assessment of expected credit losses (ECL) from its credit portfolio is subject to judgements and estimates made by management based on a variety of internal and external information, as well as the Group's experience of the performance of the portfolio under a variety of conditions. Refer to Note 1 of the Condensed Consolidated Financial Statements (attached to this U.S. Disclosure Document as part of the Annex) for further information.

Credit impairment charge/(release)

	Half Year		
	Mar 25 $M	**Sep 24 $M**	**Mar 24 $M**
Collectively assessed credit impairment charge/(release)	**(14)**	230	32
Individually assessed credit impairment charge/(release)	**157**	106	38
Total credit impairment charge/(release)	**143**	336	70

Credit impairment charge/(release) analysis

	Half Year		
	Mar 25 $M	**Sep 24 $M**	**Mar 24 $M**
New and increased provisions (net of releases)			
- Collectively assessed	**(14)**	230	32
- Individually assessed	**299**	264	201
Write-backs	**(69)**	(99)	(85)
Recoveries of amounts previously written-off	**(73)**	(59)	(78)
Total credit impairment charge/(release)	**143**	336	70

Credit impairment charge/(release) by division

	Half Year		
	Mar 25 $M	**Sep 24 $M**	**Mar 24 $M**
Collectively assessed			
Australia Retail	**16**	(23)	(6)
Australia Commercial	**(9)**	(1)	9
Institutional	**11**	14	43
New Zealand	**(25)**	(4)	(10)
Suncorp Bank[1]	**(3)**	244	-
Pacific	**(2)**	(2)	(4)
Group Centre	**(2)**	2	-
Total collectively assessed	**(14)**	230	32
Individually assessed			
Australia Retail	**47**	51	49
Australia Commercial	**59**	46	26
Institutional	**17**	(18)	(49)
New Zealand	**21**	28	14
Suncorp Bank	**14**	(1)	-
Pacific	**(1)**	-	(2)
Group Centre	**-**	-	-
Total individually assessed	**157**	106	38
Total credit impairment charge/(release)			
Australia Retail	**63**	28	43
Australia Commercial	**50**	45	35
Institutional	**28**	(4)	(6)
New Zealand	**(4)**	24	4
Suncorp Bank[1]	**11**	243	-
Pacific	**(3)**	(2)	(6)
Group Centre	**(2)**	2	-
Total credit impairment charge/(release)	**143**	336	70

1. *Includes $244 million credit impairment charge recognised on performing loans and advances for the September 2024 half.*

Credit impairment charge/(release) by division, cont'd

	Collectively assessed				Individually assessed			
	Stage 1	Stage 2	Stage 3	Total	Stage 3 - New and increased	Stage 3 - Recoveries and write-backs	Total	Total
March 2025 Half Year	$M	$M	$M	$M	$M	$M	$M	$M
Australia Retail	(14)	(3)	33	**16**	98	(51)	**47**	**63**
Australia Commercial	(34)	22	3	**(9)**	93	(34)	**59**	**50**
Institutional	(42)	45	8	**11**	51	(34)	**17**	**28**
New Zealand	(10)	(19)	4	**(25)**	38	(17)	**21**	**(4)**
Suncorp Bank	(9)	3	3	**(3)**	18	(4)	**14**	**11**
Pacific	(1)	(2)	1	**(2)**	1	(2)	**(1)**	**(3)**
Group Centre	(2)	-	-	**(2)**	-	-	**-**	**(2)**
Total	(112)	46	52	**(14)**	299	(142)	**157**	**143**
September 2024 Half Year								
Australia Retail	(11)	(29)	17	**(23)**	103	(52)	**51**	**28**
Australia Commercial	(1)	(34)	34	**(1)**	80	(34)	**46**	**45**
Institutional	15	1	(2)	**14**	35	(53)	**(18)**	**(4)**
New Zealand	(12)	14	(6)	**(4)**	42	(14)	**28**	**24**
Suncorp Bank	93	150	1	**244**	1	(2)	**(1)**	**243**
Pacific	(4)	5	(3)	**(2)**	3	(3)	-	**(2)**
Group Centre	2	-	-	**2**	-	-	-	**2**
Total	82	107	41	**230**	264	(158)	**106**	**336**
March 2024 Half Year								
Australia Retail	13	(42)	23	**(6)**	91	(42)	**49**	**43**
Australia Commercial	10	(9)	8	**9**	58	(32)	**26**	**35**
Institutional	-	9	34	**43**	21	(70)	**(49)**	**(6)**
New Zealand	11	(30)	9	**(10)**	30	(16)	**14**	**4**
Suncorp Bank	-	-	-	**-**	-	-	-	**-**
Pacific	2	(2)	(4)	**(4)**	1	(3)	**(2)**	**(6)**
Group Centre	-	-	-	**-**	-	-	-	**-**
Total	36	(74)	70	**32**	201	(163)	**38**	**70**

Collectively assessed credit impairment charge/(release)

- **Comparison of March 2025 with March 2024**

  The collectively assessed impairment release of $14 million for the March 2025 half was driven by a revision to modelling assumptions for the severe scenario and a small improvement in base case economic assumptions. This was partially offset by deterioration in credit risk profile particularly in the Institutional and Australia Commercial divisions, portfolio growth, and a net increase in management temporary adjustments for increased uncertainty and economic volatility.

  The collectively assessed impairment charge of $32 million for the March 2024 half was driven by deterioration in credit risk profile across all divisions, and portfolio growth. This was partially offset by a reduction in management temporary adjustments as anticipated risks are now represented in portfolio credit profiles.

- **Comparison of March 2025 with September 2024**

  The collectively assessed impairment release of $14 million for the March 2025 half was driven by a revision to modelling assumptions for the severe scenario and a small improvement in base case economic assumptions. This was partially offset by deterioration in credit risk profile particularly in the Institutional and Australia Commercial divisions, portfolio growth, and a net increase in management temporary adjustments for increased uncertainty and economic volatility.

  The collectively assessed impairment charge of $230 million for the September 2024 half was driven by the acquisition of Suncorp Bank ($244 million). Excluding Suncorp Bank, the collectively assessed impairment release of $14 million was driven by improvement in economic outlook, partially offset by deterioration in credit risk profile across all divisions, and portfolio growth.

Individually assessed credit impairment charge/(release)

- **Comparison of March 2025 with March 2024**

  The individually assessed credit impairment charge increased $119 million driven by the Institutional division ($66 million) due to lower recoveries and write-backs and new impairments on several single name customers, the Australia Commercial division ($33 million) due to impairment flows in the SME Banking and Agri portfolios, and the Suncorp Bank division ($14 million) due to new impairments in the commercial property portfolio.

- **Comparison of March 2025 with September 2024**

  The individually assessed credit impairment charge increased $51 million (48%) is driven by the Institutional division ($35 million) due to lower recoveries and write-backs and new impairments on several single name customers, the Australia Commercial division ($13 million) due to impairment flows in the SME Banking and Agri portfolios, and the Suncorp Bank division ($15 million) due to new impairments in the commercial property portfolio.

Allowance for expected credit losses[1]

	As at		
	Mar 25 $M	Sep 24 $M	Mar 24 $M
Collectively assessed allowance for ECL	**4,280**	4,247	4,046
Individually assessed allowance for ECL	**364**	308	325
Total allowance for ECL	**4,644**	4,555	4,371
Net loans and advances at amortised cost	**3,761**	3,675	3,489
Off-balance sheet commitments - undrawn and contingent	**852**	846	849
Investment securities - debt securities at amortised cost	**31**	34	33
Total allowance for ECL	**4,644**	4,555	4,371

Allowance for expected credit losses by division[1]

	As at		
	Mar 25 $M	Sep 24 $M	Mar 24 $M
Collectively assessed			
Australia Retail	**942**	925	948
Australia Commercial	**1,040**	1,049	1,050
Institutional	**1,491**	1,438	1,458
New Zealand	**507**	539	542
Suncorp Bank	**254**	248	-
Pacific	**45**	45	48
Group Centre	**1**	3	-
Total collectively assessed	**4,280**	4,247	4,046
Individually assessed			
Australia Retail	**52**	54	61
Australia Commercial	**139**	133	121
Institutional	**96**	58	88
New Zealand	**52**	51	38
Suncorp Bank	**14**	-	-
Pacific	**11**	12	17
Group Centre	**-**	-	-
Total individually assessed	**364**	308	325
Allowance for ECL			
Australia Retail	**994**	979	1,009
Australia Commercial	**1,179**	1,182	1,171
Institutional	**1,587**	1,496	1,546
New Zealand	**559**	590	580
Suncorp Bank	**268**	248	-
Pacific	**56**	57	65
Group Centre	**1**	3	-
Total allowance for ECL	**4,644**	4,555	4,371

1. *Includes allowance for ECL for Net loans and advances - at amortised cost, Investment securities - debt securities at amortised cost and Off-balance sheet commitments - undrawn and contingent facilities. For Investment securities - debt securities at FVOCI, the allowance for ECL is recognised in Other comprehensive income with a corresponding charge to profit or loss.*

Allowance for expected credit losses by division, cont'd[1]

	Collectively assessed				Individually assessed	
As at March 2025	**Stage 1 $M**	**Stage 2 $M**	**Stage 3 $M**	**Total $M**	**Stage 3 $M**	**Total $M**
Australia Retail	108	597	237	**942**	52	**994**
Australia Commercial	385	511	144	**1,040**	139	**1,179**
Institutional	1,179	263	49	**1,491**	96	**1,587**
New Zealand	124	307	76	**507**	52	**559**
Suncorp Bank	84	153	17	**254**	14	**268**
Pacific	17	22	6	**45**	11	**56**
Group Centre	-	1	-	**1**	-	**1**
Total	1,897	1,854	529	**4,280**	364	**4,644**
As at September 2024						
Australia Retail	121	600	204	**925**	54	**979**
Australia Commercial	418	489	142	**1,049**	133	**1,182**
Institutional	1,180	217	41	**1,438**	58	**1,496**
New Zealand	137	329	73	**539**	51	**590**
Suncorp Bank	92	150	6	**248**	-	**248**
Pacific	18	23	4	**45**	12	**57**
Group Centre	2	1	-	**3**	-	**3**
Total	1,968	1,809	470	**4,247**	308	**4,555**
As at March 2024						
Australia Retail	131	631	186	**948**	61	**1,009**
Australia Commercial	420	522	108	**1,050**	121	**1,171**
Institutional	1,197	218	43	**1,458**	88	**1,546**
New Zealand	148	315	79	**542**	38	**580**
Suncorp Bank	-	-	-	**-**	-	**-**
Pacific	22	19	7	**48**	17	**65**
Group Centre	-	-	-	**-**	-	**-**
Total	1,918	1,705	423	**4,046**	325	**4,371**

1. Includes allowance for ECL for Net loans and advances - at amortised cost, Investment securities - debt securities at amortised cost and Off-balance sheet commitments - undrawn and contingent facilities. For Investment securities - debt securities at FVOCI, the allowance for ECL is recognised in Other comprehensive income with a corresponding charge to profit or loss.

Comparison of March 2025 with March 2024

- The allowance for ECL increased $273 million (6%) driven by a $234 million increase in collectively assessed allowance for ECL, and a $39 million increase in the individually assessed allowance for ECL. The increase in collectively assessed allowance for ECL was driven by additional allowance for ECL for Suncorp Bank ($254 million), deterioration in credit risk profile across all divisions ($153 million), portfolio growth ($45 million), net increase in management temporary adjustments ($20 million) for increased uncertainty and economic volatility, and the impact of foreign currency translation ($5 million). This was partially offset by improvement in economic outlook ($243 million) from a revision to modelling assumptions for the severe scenario and a small improvement in base case economic assumptions. The increase in individually assessed allowance for ECL was driven by increases in the Australia Commercial division ($18 million) due to higher impairments in the SME Banking portfolio, New Zealand division ($14 million) due to higher impairment flows in the Business & Agri portfolio, Suncorp Bank ($14 million) due to new impairments in the commercial property portfolio, and Institutional division ($8 million) due to increase in new impairments and lower write-backs.

Comparison of March 2025 with September 2024

- The allowance for ECL increased $89 million (2%) driven by a $33 million increase in collectively assessed allowance for ECL and a $56 million increase in individually assessed allowance for ECL. The increase in collectively assessed allowance for ECL was driven by deterioration in credit risk profile across the Institutional and Australia Commercial divisions ($50 million), the impact of foreign currency translation ($47 million), portfolio growth ($17 million), and a net increase in management temporary adjustments ($14 million) for increased uncertainty and economic volatility, partially offset by a revision to modelling assumptions for the severe scenario ($72 million) and a small improvement in base case economic assumptions ($23 million). The increase in individually assessed allowance for ECL was driven by an increase in the Institutional division ($38 million) due to increase in new impairments and lower write-backs, and the Suncorp Bank division ($14 million) due to new impairments in the commercial property portfolio.

Gross impaired assets

	As at		
	Mar 25 $M	Sep 24 $M	Mar 24 $M
Gross impaired assets			
Impaired loans[1]	**1,020**	881	880
Restructured items[2]	**1,152**	786	589
Non-performing commitments, contingencies and derivatives[1]	**80**	26	49
Gross impaired assets	**2,252**	1,693	1,518
Gross impaired assets by division			
Australia Retail	**1,204**	870	669
Australia Commercial	**386**	291	261
Institutional	**319**	284	437
New Zealand	**195**	158	119
Suncorp Bank	**123**	66	-
Pacific	**25**	24	32
Gross impaired assets	**2,252**	1,693	1,518
Gross impaired assets by size of exposure			
Less than $10 million	**1,763**	1,422	1,095
$10 million to $100 million	**489**	271	262
Greater than $100 million	**-**	-	161
Gross impaired assets	**2,252**	1,693	1,518
Individually assessed provisions			
Impaired loans	**(346)**	(303)	(320)
Non-performing commitments, contingencies and derivatives	**(18)**	(5)	(5)
Net impaired assets	**1,888**	1,385	1,193

1. *Impaired loans and non-performing commitments, contingencies and derivatives do not include exposures that are collectively assessed for Stage 3 ECL, which comprise unsecured retail exposures of 90+ days past due and defaulted but well secured wholesale and retail exposures.*
2. *Restructured items are facilities where the original contractual terms have been modified for reasons related to the financial difficulties of the customer and are collectively assessed for Stage 3 ECL. Restructuring may consist of reduction of interest, principal or other payments legally due, or an extension in maturity materially beyond those typically offered to new facilities with similar risk. Upon restructuring, an exposure's delinquency status may be re-aged where certain conditions are met.*

Comparison of March 2025 with March 2024

- Gross impaired assets increased $734 million (48%) driven by increases in the Australia Retail division ($535 million) due to restructured home loan facilities, the Australia Commercial ($125 million) and New Zealand ($76 million) divisions due to portfolio deterioration, and acquisition of Suncorp Bank ($123 million). This was partially offset by a decrease in the Institutional division ($118 million) due to upgrade of several single name exposures.

Comparison of March 2025 with September 2024

- Gross impaired assets increased $559 million (33%) driven by increases in the Australia Retail division ($334 million) due to restructured home loan facilities, the Australia Commercial division ($95 million) due to a new single name impairment in the Agri portfolio, the Suncorp Bank division ($57 million) due to new impairments in the commercial property portfolio, the New Zealand division ($37 million) due to credit deterioration across all portfolios and the Institutional division ($35 million) due to downgrade of several single name exposures.

The Group’s individually assessed provision coverage ratio on impaired assets was 16.2% at 31 March 2025 (Sep 24: 18.2%; Mar 24: 21.4%).

New impaired assets

	Half Year		
	Mar 25 $M	**Sep 24 $M**	**Mar 24 $M**
New impaired assets			
Impaired loans[1]	**621**	498	359
Restructured items[2]	**554**	330	269
Non-performing commitments and contingencies[1]	**79**	31	2
Total new impaired assets	**1,254**	859	630
New impaired assets by division			
Australia Retail	**654**	454	323
Australia Commercial	**223**	132	122
Institutional	**154**	141	98
New Zealand	**140**	119	84
Suncorp Bank	**78**	2	-
Pacific	**5**	11	3
Total new impaired assets	**1,254**	859	630

1. *Impaired loans and non-performing commitments and contingencies do not include exposures that are collectively assessed for Stage 3 ECL, which comprise unsecured retail exposures of 90+ days past due and defaulted but well secured exposures.*
2. *Restructured items are facilities where the original contractual terms have been modified for reasons related to the financial difficulties of the customer and are collectively assessed for Stage 3 ECL. Restructuring may consist of reduction of interest, principal or other payments legally due, or an extension in maturity materially beyond those typically offered to new facilities with similar risk. Upon restructuring, an exposure's delinquency status may be re-aged where certain conditions are met.*

Comparison of March 2025 with March 2024

- New impaired assets increased $624 million (99%) driven by the Australia Retail division ($331 million) due to higher new impairment flows from restructured home loan facilities, the Australia Commercial division ($101 million) due to a new single name impairment in the Agri portfolio, the Suncorp Bank division ($78 million) due to new impairments in the commercial property portfolio, the Institutional division ($56 million) due to downgrade of several single name exposures, and the New Zealand division ($56 million) due to credit deterioration across all portfolios.

Comparison of March 2025 with September 2024

- New impaired assets increased $395 million (46%) driven by the Australia Retail division ($200 million) due to higher new impairment flows from restructured home loan facilities, the Australia Commercial division ($91 million) due to a new single name impairment in the Agri portfolio, the Suncorp Bank division ($76 million) due to new impairments in the commercial property portfolio, the New Zealand division ($21 million) due to credit deterioration across all portfolios and the Institutional division ($13 million) due to downgrade of several single name exposures.

Other potential problem loans

The Group does not use the category "potential problem loans" for loans that continue to accrue interest. The Group's risk grading systems identify customers that attract a higher probability of default and where necessary these customers receive specialist management attention.

Accruing loans - past due 90 days or more

Set out below are net loans and advances that are past due by 90 days or more. A facility is past due when a contracted payment (principal or interest) has not been met or the facility is outside of contractual arrangements (e.g., an overdraft is over the limit). This category comprises loans that are past due 90 days or more, loans that are well secured and continue to accrue interest, or loans that are past due 90 days or more and are portfolio managed (typically unsecured personal loans and credit cards) that can be held on an accrual basis (continuing to accrue interest) for up to 180 days.

	As at		
	Mar 25 $M	**Sep 24 $M**	**Mar 24 $M**
Australia Retail	**2,535**	2,463	2,250
Australia Commercial	**389**	354	357
Institutional	**87**	17	111
New Zealand	**944**	776	712
Suncorp Bank	**583**	543	-
Pacific	**18**	20	58
Group Centre	**-**	-	2
Total accruing loans - past due 90 days or more	**4,556**	4,173	3,490

Comparison of March 2025 with March 2024

- The accruing loans – past due 90 days or more increased $1,066 million (31%) driven by the impact of Suncorp Bank acquisition ($583 million) and increases in the Australia Retail ($285 million) and New Zealand divisions ($232 million) in home loan portfolios.

Comparison of March 2025 with September 2024

- The accruing loans – past due 90 days or more increased $383 million (9%) driven by increases in the New Zealand ($168 million) and Australia Retail ($72 million) divisions in home loan portfolios and an increase in the Institutional division ($70 million).

Concentrations of credit risk/loans and advances by industry category

Credit risk becomes concentrated when a number of customers are engaged in similar activities, have similar economic characteristics, or have similar activities within the same geographic region - therefore, these customers may be similarly affected by changes in economic or other conditions. The Group monitors its credit portfolios to manage risk concentration and rebalance the portfolio. The Group also applies single customer counterparty limits to protect against unacceptably large exposures to one single customer.

For further information relating to the Group's credit risk exposures, refer to Note 17 of the 2024 Financial Report (attached to the 2024 Annual U.S. Disclosure Document as part of Annex A).

Income tax expense

	Half Year		
	Mar 25 $M	**Sep 24 $M**	**Mar 24 $M**
Income tax expense	**1,538**	1,381	1,435
Effective tax rate	**29.5%**	30.4%	29.3%
Australian corporate tax rate	**30.0%**	30.0%	30.0%

Comparison of March 2025 with March 2024

- The effective tax rate increased from 29.3% to 29.5%. The increase of 20 bps was driven by lower equity accounted earnings (29 bps), lower relative contribution from offshore earnings that attract a lower rate of tax (17 bps) and various other small items (29 bps), partially offset by lower withholding tax expense on foreign dividends (22 bps), lower non-deductible interest on convertible instruments (20 bps), and lower prior period adjustments (13 bps).

Comparison of March 2025 with September 2024

- The effective tax rate decreased from 30.4% to 29.5%. The decrease of 90 bps was driven by lower non-deductible interest on convertible instruments (21 bps), lower prior period adjustments (18 bps), lower withholding tax expense on foreign dividends (12 bps), higher relative contribution from offshore earnings that attract a lower rate of tax (5 bps), higher equity accounted earnings (4 bps), and various other small items (30 bps).

CONDENSED CONSOLIDATED BALANCE SHEET INFORMATION

	As at		
	Mar 25 $B	Sep 24 $B	Mar 24 $B
Assets			
Cash and cash equivalents / Settlement balances owed to ANZ / Collateral paid	**212.5**	166.5	149.7
Trading assets and investment securities	**200.8**	186.0	160.0
Derivative financial instruments	**49.6**	54.4	47.5
Net loans and advances	**820.9**	804.0	715.8
Other[1]	**19.2**	18.7	17.1
Total assets	**1,303.0**	1,229.6	1,090.1
Liabilities			
Settlement balances owed by ANZ / Collateral received	**26.2**	22.8	22.4
Deposits and other borrowings	**973.6**	905.2	807.2
Derivative financial instruments	**44.3**	55.3	42.7
Debt issuances	**169.6**	156.4	127.1
Other[2]	**18.6**	21.1	20.5
Total liabilities	**1,232.3**	1,160.8	1,019.9
Total shareholders' equity	**70.7**	68.8	70.2

1. *Other within Total assets comprises Regulatory deposits, Investment in associates, Current tax assets, Deferred tax assets, Goodwill and other intangible assets, Premises and equipment, and Other assets as presented in the Condensed Consolidated Balance Sheet in the Condensed Consolidated Financial Statements (attached to this U.S. Disclosure Document as part of the Annex).*
2. *Other within Total liabilities comprises Current tax liabilities, Deferred tax liabilities, Payables and other liabilities, Employee entitlements, and Other provisions as presented in the Condensed Consolidated Balance Sheet in the Condensed Consolidated Financial Statements (attached to this U.S. Disclosure Document as part of the Annex).*

Comparison of March 2025 with March 2024

- Cash / Settlement balances owed to ANZ / Collateral paid increased $62.8 billion (42%) driven by increases in short-dated reverse repurchase agreements, balances with central banks, overnight interbank deposits, settlement balances owed to ANZ, collateral paid and the impact of foreign currency translation.
- Trading assets and investment securities increased $40.8 billion (26%) driven by increases in government and semi-government bonds and treasury bills, the impact of Suncorp Bank acquisition, increase in commodity assets, and the impact of foreign currency translation.
- Net loans and advances increased $105.1 billion (15%) driven by the impact of Suncorp Bank acquisition, home loan growth and higher business lending, and the impact of foreign currency translation.
- Deposits and other borrowings increased $166.4 billion (21%) driven by the impact of Suncorp Bank acquisition, higher customer deposits, increases in deposits from banks and repurchase agreements, increases in commercial paper and the impact of foreign currency translation.
- Debt issuances increased $42.5 billion (33%) driven by issue of new senior and subordinated debt and the impact of Suncorp Bank acquisition, partially offset by the redemption of ANZ Capital Notes 5.

Comparison of March 2025 with September 2024

- Cash / Settlement balances owed to ANZ / Collateral paid increased $46.0 billion (28%) driven by increases in balances with central banks, short-dated reverse repurchase agreements and the impact of foreign currency translation, partially offset by lower overnight interbank deposits.
- Trading assets and investment securities increased $14.8 billion (8%) driven by increases in government and semi-government bonds and treasury bills, and the impact of foreign currency translation.
- Derivative financial assets and liabilities decreased $4.8 billion (9%) and $11.0 billion (20%) respectively driven by market movements, primarily the appreciation of the USD and the broad decrease in interest rates across major currencies.
- Net loans and advances increased $16.9 billion (2%) driven by home loan growth, and the impact of foreign currency translation.
- Deposits and other borrowings increased $68.4 billion (8%) driven by higher customer deposits, increases in commercial paper, deposits from banks and repurchase agreements, and the impact of foreign currency translation. This was partially offset by lower certificates of deposit.
- Debt issuances increased $13.2 billion (8%) driven by the issue of new senior and subordinated debt, and the impact of foreign currency translation, partially offset by the redemption of ANZ Capital Notes 5.

RESULTS BY DIVISION

For further information on the composition of the divisions refer to “Section 2: Information on the Group - Principal Activities”.

The Group measures the performance of operating segments on a cash profit basis, a non-IFRS measure which represents how the segments are managed internally. To calculate cash profit, the Group excludes items from profit after tax attributable to shareholders. The adjustments relate to impacts of economic hedges and revenue and expense hedges, which represent timing differences that will reverse through earnings in the future, and the amortisation of acquired intangible assets recognised as a result of the Suncorp Bank acquisition. The amortisation is removed from cash profit as the assets and associated amortisation only arise through acquisition accounting and would not occur in the ordinary course of business.

The adjustments made in arriving at cash profit are included in statutory profit which is subject to review within the context of the external auditor’s review of the Condensed Consolidated Financial Statements. Cash profit is not subject to review by the external auditor. Information presented on a cash basis should not be considered as an indication of, or as a substitute for, statutory measures of the financial performance of the operating segments.

Transactions between divisions across segments within the Group are conducted on an arm’s-length basis and where relevant disclosed as part of the income and expenses of these segments.

The divisions reported are consistent with internal reporting provided to the chief operating decision maker, being the Chief Executive Officer.

March 2025 Half Year	Australia Retail $M	Australia Commercial $M	Institutional $M	New Zealand $M	Suncorp Bank $M	Pacific $M	Group Centre $M	Group Total $M
Net interest income	2,592	1,589	2,033	1,589	823	55	157	8,838
Net fee and commission income	215	138	333	193	21	7	(14)	893
Other income[1,2,4]	54	15	1,053	-	9	37	70	1,238
Operating income[4]	2,861	1,742	3,419	1,782	853	99	213	10,969
Operating expenses[3,4]	(1,781)	(755)	(1,461)	(685)	(433)	(74)	(517)	(5,706)
Cash profit before credit impairment and income tax[4]	1,080	987	1,958	1,097	420	25	(304)	5,263
Credit impairment (charge)/release	(63)	(50)	(28)	4	(11)	3	2	(143)
Cash profit before income tax[4]	1,017	937	1,930	1,101	409	28	(302)	5,120
Income tax expense[1,2,3,4]	(312)	(282)	(550)	(309)	(123)	(7)	73	(1,510)
Non-controlling interests	-	-	-	-	-	(1)	(20)	(21)
Cash profit/(loss)[4]	705	655	1,380	792	286	20	(249)	3,589
Economic hedges[1,4]								167
Revenue and expense hedges[2,4]								(36)
Amortisation of acquired intangibles[3,4]								(57)
Profit after tax attributable to shareholders								3,663
Financial Position								
Total external assets	343,706	66,327	618,958	127,467	88,785	3,365	54,363	1,302,971
Total external liabilities	187,342	124,811	493,342	122,408	82,483	3,848	218,025	1,232,259

1. *The economic hedges cash profit adjustment relates to the Institutional, New Zealand, Suncorp Bank and Group Centre divisions. In the condensed consolidated income statement, $236 million gain was recognised in Other operating income for the March 2025 half and $69 million of Income tax expense was recognised for the March 2025 half.*
2. *The revenue and expense hedges cash profit adjustment relates to the Group Centre division. In the condensed consolidated income statement, $52 million loss was recognised in Other operating income for the March 2025 half and $16 million of Income benefit was recognised for the March 2025 half.*
3. *The amortisation of acquired intangible assets cash profit adjustment relates to the Suncorp Bank division. In the condensed consolidated income statement, $82 million was recognised in Operating expenses for the March 2025 half and $25 million of Income tax benefit was recognised for the March 2025 half.*
4. *Items that are not considered integral to the ongoing performance of the operating segments are removed from the operating segments. The resulting profit by operating segment, referred to as cash profit, is a non-IFRS measure which represents how the segments are managed internally.*

September 2024 Half Year	Australia Retail $M	Australia Commercial $M	Institutional $M	New Zealand $M	Suncorp Bank $M	Pacific $M	Group Centre $M	Group Total $M
Net interest income	2,615	1,584	1,859	1,571	251	60	197	**8,137**
Net fee and commission income	284	154	372	192	6	6	(13)	**1,001**
Other income[1,2,3]	79	19	1,089	(1)	-	41	68	**1,295**
Operating income[3]	2,978	1,757	3,320	1,762	257	107	252	**10,433**
Operating expenses	(1,781)	(744)	(1,431)	(699)	(188)	(68)	(579)	**(5,490)**
Cash profit before credit impairment and income tax[3]	1,197	1,013	1,889	1,063	69	39	(327)	**4,943**
Credit impairment (charge)/release	(28)	(45)	4	(24)	(243)	2	(2)	**(336)**
Cash profit before income tax[3]	1,169	968	1,893	1,039	(174)	41	(329)	**4,607**
Income tax expense[1,2,3]	(356)	(291)	(557)	(294)	52	(11)	61	**(1,396)**
Non-controlling interests	-	-	-	-	-	(1)	(20)	**(21)**
Cash profit/(loss)[3]	813	677	1,336	745	(122)	29	(288)	**3,190**
Economic hedges[1,3]								**(67)**
Revenue and expense hedges[2,3]								**22**
Amortisation of acquired intangibles								**-**
Profit after tax attributable to shareholders								**3,145**
Financial Position								
Total external assets	335,356	65,456	574,998	127,032	87,185	3,162	36,396	**1,229,585**
Total external liabilities	180,801	122,029	460,053	120,203	81,610	3,686	192,443	**1,160,825**
March 2024 Half Year								
Net interest income	2,608	1,580	1,882	1,572	-	63	195	**7,900**
Net fee and commission income	247	146	368	207	-	8	(13)	**963**
Other income[1,2,3]	54	23	1,319	1	-	36	54	**1,487**
Operating income[3]	2,909	1,749	3,569	1,780	-	107	236	**10,350**
Operating expenses	(1,735)	(763)	(1,444)	(677)	-	(70)	(490)	**(5,179)**
Cash profit before credit impairment and income tax[3]	1,174	986	2,125	1,103	-	37	(254)	**5,171**
Credit impairment (charge)/release	(43)	(35)	6	(4)	-	6	-	**(70)**
Cash profit before income tax[3]	1,131	951	2,131	1,099	-	43	(254)	**5,101**
Income tax expense[1,2,3]	(337)	(286)	(609)	(308)	-	(11)	59	**(1,492)**
Non-controlling interests	-	-	-	-	-	(1)	(13)	**(14)**
Cash profit/(loss)[3]	794	665	1,522	791	-	31	(208)	**3,595**
Economic hedges[1,3]								**(197)**
Revenue and expense hedges[2,3]								**52**
Amortisation of acquired intangibles								**-**
Profit after tax attributable to shareholders								**3,450**
Financial Position								
Total external assets	325,775	64,279	513,026	124,986	-	3,195	58,877	**1,090,138**
Total external liabilities	176,484	122,386	407,444	122,310	-	3,791	187,521	**1,019,936**

1. *The economic hedges cash profit adjustment relates to the Institutional, New Zealand, Suncorp Bank and Group Centre divisions. In the condensed consolidated income statement, $91 million loss was recognised in Other operating income for the September 2024 half (Mar 24 half: $277 million loss) and $24 million of Income tax benefit was recognised for the September 2024 half (Mar 24 half: $80 million benefit).*
2. *The revenue and expense hedges cash profit adjustment relates to the Group Centre division. In the condensed consolidated income statement, $31 million gain was recognised in Other operating income for the September 2024 half (Mar 24 half: $75 million gain) and $9 million of Income tax expense was recognised for the September 24 half (Mar 24 half: $23 million expense).*
3. *Items that are not considered integral to the ongoing performance of the operating segments are removed from the operating segments. The resulting profit by operating segment, referred to as cash profit, is a non-IFRS measure which represents how the segments are managed internally.*

Australia Retail

	Half Year		
Australia Retail	**Mar 25 $M**	**Sep 24 $M**	**Mar 24 $M**
Net interest income	**2,592**	2,615	2,608
Other operating income	**269**	363	301
Operating income	**2,861**	2,978	2,909
Operating expenses	**(1,781)**	(1,781)	(1,735)
Cash profit before credit impairment and income tax	**1,080**	1,197	1,174
Credit impairment (charge)/release	**(63)**	(28)	(43)
Cash profit before income tax	**1,017**	1,169	1,131
Income tax expense	**(312)**	(356)	(337)
Cash profit	**705**	813	794
Balance Sheet			
Net loans and advances	**340,953**	332,501	322,364
Other external assets	**2,753**	2,855	3,411
External assets	**343,706**	335,356	325,775
Customer deposits	**183,357**	176,813	172,312
Other external liabilities	**3,985**	3,988	4,172
External liabilities	**187,342**	180,801	176,484
Risk weighted assets	**121,111**	116,931	130,184
Average gross loans and advances[1]	**337,660**	328,413	318,649
Average deposits and other borrowings[1]	**180,088**	174,248	168,912
Ratios			
Return on average RWA	**1.19%**	1.30%	1.22%
Net interest margin	**1.84%**	1.89%	1.94%
Operating expenses to operating income	**62.3%**	59.8%	59.6%
Operating expenses to average assets	**1.05%**	1.08%	1.08%
Individually assessed credit impairment charge/(release)	**47**	51	49
Individually assessed credit impairment charge/(release) as a % of average GLA[2]	**0.03%**	0.03%	0.03%
Collectively assessed credit impairment charge/(release)	**16**	(23)	(6)
Collectively assessed credit impairment charge/(release) as a % of average GLA[2]	**0.01%**	(0.01%)	0.00%
Gross impaired assets	**1,204**	870	669
Gross impaired assets as a % of GLA	**0.35%**	0.26%	0.21%
Total FTE	**10,950**	10,832	11,383

1. *Averages are calculated using predominantly daily averages.*
2. *Credit impairment charge/(release) used in the ratio relates to gross loans and advances and off-balance sheet commitments - undrawn and contingent liabilities.*

Comparison of March 2025 with March 2024

Cash profit decreased by $89 million (11%).

Key factors affecting the result were:

- Lending volumes increased driven by home loan growth.
- Net interest margin decreased 10 bps driven by margin contraction from home loan pricing competition, and higher net funding costs. This was partially offset by favourable deposit margins and higher earnings on replicating portfolio.
- Other operating income decreased $32 million (11%) driven by higher customer remediation.
- Operating expenses increased $46 million (3%) driven by driven by inflationary impacts and incremental costs associated with strategic initiatives, partially offset by benefits from productivity initiatives and lower restructuring spend.
- Credit impairment charge increased $20 million (47%) primarily driven by higher collectively assessed credit impairment.

Comparison of March 2025 with September 2024

Cash profit decreased by $108 million (13%).

Key factors affecting the result were:

- Lending volumes increased driven by home loan growth.
- Net interest margin decreased 5 bps driven by margin contraction from home loan pricing competition and higher net funding costs. This was partially offset by favourable deposit margins, and higher earnings on replicating portfolio.
- Other operating income decreased $94 million (26%) driven by timing of recognition of cards incentives and lower insurance-related income.
- Operating expenses remained flat driven by inflationary impacts and higher restructuring expense, offset by benefits from productivity initiatives and investment spend seasonality.
- Credit impairment charge increased $35 million driven by higher collectively assessed credit impairment.

Australia Commercial

	Half Year		
Australia Commercial	**Mar 25 $M**	**Sep 24 $M**	**Mar 24 $M**
Net interest income	**1,589**	1,584	1,580
Other operating income	**153**	173	169
Operating income	**1,742**	1,757	1,749
Operating expenses	**(755)**	(744)	(763)
Cash profit before credit impairment and income tax	**987**	1,013	986
Credit impairment (charge)/release	**(50)**	(45)	(35)
Cash profit before income tax	**937**	968	951
Income tax expense	**(282)**	(291)	(286)
Cash profit	**655**	677	665
Balance Sheet			
Net loans and advances	**65,995**	65,025	63,874
Other external assets	**332**	431	405
External assets	**66,327**	65,456	64,279
Customer deposits	**119,388**	116,273	116,463
Other external liabilities	**5,423**	5,756	5,923
External liabilities	**124,811**	122,029	122,386
Risk weighted assets	**46,637**	45,460	46,601
Average gross loans and advances[1]	**66,219**	65,752	63,880
Average deposits and other borrowings[1]	**120,150**	116,314	115,357
Ratios			
Return on average RWA	**2.86%**	2.94%	2.83%
Net interest margin[2]	**2.53%**	2.59%	2.60%
Operating expenses to operating income	**43.3%**	42.3%	43.6%
Operating expenses to average assets	**1.20%**	1.21%	1.25%
Individually assessed credit impairment charge/(release)	**59**	46	26
Individually assessed credit impairment charge/(release) as a % of average GLA[3]	**0.18%**	0.14%	0.08%
Collectively assessed credit impairment charge/(release)	**(9)**	(1)	9
Collectively assessed credit impairment charge/(release) as a % of average GLA[3]	**(0.03%)**	(0.00%)	0.03%
Gross impaired assets	**386**	291	261
Gross impaired assets as a % of GLA	**0.58%**	0.44%	0.40%
Total full time equivalent staff	**3,361**	3,294	3,442

1. *Averages are calculated using predominantly daily averages.*
2. *Australia Commercial division generates positive net interest income from surplus deposits held. Accordingly, $60.1 billion of average deposits for the March 2025 half (Sep 24 half: $57.0 billion; Mar 24: $58.1 billion) have been included with average net interest earning assets for the net interest margin calculation to align with internal management reporting view.*
3. *Credit impairment charge/(release) used in the ratio relates to gross loans and advances and off-balance sheet commitments - undrawn and contingent liabilities.*

Comparison of March 2025 with March 2024

Cash profit decreased by $10 million (2%).

Key factors affecting the result were:

- Lending volumes increased driven by Diversified & Specialist Businesses.
- Net interest margin decreased 7 bps driven by asset margin contraction from pricing competition, unfavourable deposit margin and mix with a shift towards lower margin savings and term deposits. This was partially offset by higher earnings on replicating portfolio, and lower net funding costs.
- Other operating income decreased $16 million (9%) driven by lower non-lending fees.
- Operating expenses decreased $8 million (1%) driven by benefits from productivity initiatives and lower restructuring expense partially offset by inflationary impacts.
- Credit impairment charge increased $15 million (43%) driven by higher individually assessed credit impairment charge due to impairment flows in the SME Banking and Agri portfolios, partially offset by lower collectively assessed credit impairment.

Comparison of March 2025 with September 2024

Cash profit decreased by $22 million (3%).

Key factors affecting the result were:

- Lending volumes increased driven by Diversified & Specialist Businesses.
- Net interest margin decreased 6 bps driven by asset margin contraction from pricing competition, unfavourable deposit margin and mix with a shift towards lower margin savings and term deposits. This was partially offset by higher earnings on replicating portfolio, and lower net funding costs.
- Other operating income decreased $20 million (12%) driven by lower non-lending fees.
- Operating expenses increased $11 million (1%) driven by inflationary impacts, partially offset by benefits from productivity initiatives, and timing of investment spend.
- Credit impairment charge increased $5 million (11%) driven by higher individually assessed credit impairment charge due to impairment flows in the SME Banking and Agri portfolios, partially offset by higher collectively assessed credit impairment release.

Institutional

Institutional	Half Year Mar 25 $M	Sep 24 $M	Mar 24 $M
Net interest income	**2,033**	1,859	1,882
Other operating income	**1,386**	1,461	1,687
Operating income	**3,419**	3,320	3,569
Operating expenses	**(1,461)**	(1,431)	(1,444)
Cash profit before credit impairment and income tax	**1,958**	1,889	2,125
Credit impairment (charge)/release	**(28)**	4	6
Cash profit before income tax	**1,930**	1,893	2,131
Income tax expense	**(550)**	(557)	(609)
Cash profit	**1,380**	1,336	1,522
Consisting of:			
Transaction Banking	**482**	530	553
Corporate Finance	**573**	604	590
Markets	**342**	275	442
Central Functions	**(17)**	(73)	(63)
Cash profit	**1,380**	1,336	1,522
Balance Sheet			
Net loans and advances	**216,581**	210,464	206,268
Other external assets	**402,377**	364,534	306,758
External assets	**618,958**	574,998	513,026
Customer deposits	**292,530**	264,414	249,169
Other external liabilities	**200,812**	195,639	158,275
External liabilities	**493,342**	460,053	407,444
Risk weighted assets	**178,384**	166,906	171,437
Average gross loans and advances[1]	**225,664**	211,735	207,308
Average deposits and other borrowings[1]	**394,567**	353,479	369,517
Ratios			
Return on average RWA	**1.55%**	1.59%	1.77%
Net interest margin	**0.76%**	0.74%	0.76%
Net interest margin (excluding Markets business unit)	**2.24%**	2.36%	2.39%
Operating expenses to operating income	**42.7%**	43.1%	40.5%
Operating expenses to average assets	**0.45%**	0.48%	0.49%
Individually assessed credit impairment charge/(release)	**17**	(18)	(49)
Individually assessed credit impairment charge/(release) as a % of average GLA[2]	**0.02%**	(0.02%)	(0.05%)
Collectively assessed credit impairment charge/(release)	**11**	14	43
Collectively assessed credit impairment charge/(release) as a % of average GLA[2]	**0.01%**	0.01%	0.04%
Gross impaired assets	**319**	284	437
Gross impaired assets as a % of GLA	**0.15%**	0.13%	0.21%
Total FTE	**6,460**	6,272	6,310

1. *Averages are calculated using predominantly daily averages.*
2. *Credit impairment charge/(release) used in the ratio relates to gross loans and advances and off-balance sheet commitments - undrawn and contingent liabilities.*

Comparison of March 2025 with March 2024

Cash profit decreased by $142 million (9%).

Key factors affecting the result were:

- Lending volumes increased driven by Corporate Finance and Transaction Banking, partially offset by Markets.
- Net interest margin (excl. Markets business unit) decreased 15 bps driven by impact from lower cash rates, unfavourable mix impacts from faster growth in average lending compared to average deposits, and lower asset margins.
- Other operating income decreased $301 million (18%) driven by Markets reflecting a less favourable external trading environment.
- Operating expenses increased $17 million (1%) driven by inflationary impacts partially offset by benefits from productivity initiatives and lower restructuring expenses.
- Credit impairment charge increased $34 million driven by higher individually assessed credit impairment charge due to lower write-backs and recoveries and new impairment on a few single name customers, partially offset by lower collectively assessed credit impairment charge.

Comparison of March 2025 with September 2024

Cash profit increased by $44 million (3%).

Key factors affecting the result were:

- Lending volumes increased driven by Corporate Finance and Transaction Banking, partially offset by Markets.
- Net interest margin (excl. Markets business unit) decreased 12 bps driven by impacts from lower cash rates, unfavourable mix impacts from faster growth in average lending compared to average deposits, and lower asset margins.
- Other operating income decreased $75 million (5%) primarily driven by Markets.
- Operating expenses increased $30 million (2%) driven by inflationary impacts partially offset by benefits from productivity initiatives, lower restructuring expense, and timing of investment spend.
- Credit impairment charge increased $32 million driven by higher individually assessed credit impairment charge due to lower write-backs and recoveries and new impairment on a few single name customers.

New Zealand

Table reflects NZD for New Zealand.
AUD results shown on page 69.

	Half Year		
New Zealand	**Mar 25 NZD M**	**Sep 24 NZD M**	**Mar 24 NZD M**
Net interest income	**1,755**	1,716	1,692
Other operating income	**214**	209	224
Operating income	**1,969**	1,925	1,916
Operating expenses	**(759)**	(763)	(729)
Cash profit before credit impairment and income tax	**1,210**	1,162	1,187
Credit impairment (charge)/release	**5**	(26)	(4)
Cash profit before income tax	**1,215**	1,136	1,183
Income tax expense	**(341)**	(322)	(331)
Cash profit	**874**	814	852
Consisting of:			
Personal	**603**	585	545
Business & Agri	**273**	225	305
Central Functions	**(2)**	4	2
Cash profit	**874**	814	852
Balance Sheet			
Net loans and advances	**136,454**	134,399	132,608
Other external assets	**3,756**	3,840	3,664
External assets	**140,210**	138,239	136,272
Customer deposits	**113,584**	109,810	108,789
Other external liabilities	**21,062**	20,997	24,566
External liabilities	**134,646**	130,807	133,355
Risk weighted assets	**65,874**	67,551	72,778
Average gross loans and advances[1]	**136,023**	134,160	132,438
Average deposits and other borrowings[1]	**116,653**	115,566	114,514
Net funds management income	**99**	101	99
Funds under management	**38,861**	39,663	40,514
Average funds under management	**39,431**	39,945	38,745
Ratios			
Return on average RWA	**2.64%**	2.34%	2.31%
Net interest margin	**2.60%**	2.57%	2.56%
Operating expenses to operating income	**38.5%**	39.6%	38.0%
Operating expenses to average assets	**1.09%**	1.11%	1.08%
Individual credit impairment charge/(release)	**23**	31	14
Individual credit impairment charge/(release) as a % of average GLA[2]	**0.03%**	0.05%	0.02%
Collective credit impairment charge/(release)	**(28)**	(5)	(10)
Collective credit impairment charge/(release) as a % of average GLA[2]	**(0.04%)**	(0.01%)	(0.02%)
Gross impaired assets	**215**	171	130
Gross impaired assets as a % of GLA	**0.16%**	0.13%	0.10%
Total full time equivalent staff	**6,680**	6,756	6,754

1. *Averages are calculated using predominantly daily averages.*
2. *Credit impairment charge/(release) used in the ratio relates to gross loans and advances and off-balance sheet commitments - undrawn and contingent liabilities.*

New Zealand results and commentary are reported in NZD. AUD results are shown on page 69.

Comparison of March 2025 with March 2024

Cash profit increased by NZD 22 million (3%).

Key factors affecting the result were:

- Lending volumes increased driven by home loan growth, partially offset by contraction in business and unsecured lending.
- Net interest margin increased 4 bps driven by favourable lending margins, partially offset by unfavourable deposit margin.
- Other operating income decreased NZD 10 million (4%) driven by lower non-lending fees.
- Operating expenses increased NZD 30 million (4%) driven by inflationary impacts partially offset by benefits from productivity initiatives.
- Credit impairment decreased NZD 9 million driven by higher collectively assessed credit impairment release, partially offset by higher individually assessed credit impairment charge.

Comparison of March 2025 with September 2024

Cash profit increased by NZD 60 million (7%).

Key factors affecting the result were:

- Lending volumes increased driven by home loan growth, partially offset by contraction in business and unsecured lending.
- Net interest margin increased 3 bps driven by favourable lending margins, partially offset by unfavourable deposit margin.
- Other operating income increased NZD 5 million (2%) driven by timing of card incentives and seasonality of fees.
- Operating expenses decreased NZD 4 million (1%) driven by lower restructuring expense, productivity benefits and timing of investment spend, partially offset by inflationary impacts.
- Credit impairment decreased NZD 31 million driven by higher collectively assessed credit impairment release and lower individually assessed credit impairment charge.

New Zealand

Table reflects AUD for New Zealand.
NZD results shown on page 67.

	Half Year		
New Zealand	**Mar 25 $M**	**Sep 24 $M**	**Mar 24 $M**
Net interest income	**1,589**	1,571	1,572
Other operating income	**193**	191	208
Operating income	**1,782**	1,762	1,780
Operating expenses	**(685)**	(699)	(677)
Cash profit before credit impairment and income tax	**1,097**	1,063	1,103
Credit impairment (charge)/release	**4**	(24)	(4)
Cash profit before income tax	**1,101**	1,039	1,099
Income tax expense	**(309)**	(294)	(308)
Cash profit	**792**	745	791
Consisting of:			
Personal	**547**	535	507
Business & Agri	**247**	206	283
Central Functions	**(2)**	4	1
Cash profit	**792**	745	791
Balance Sheet			
Net loans and advances	**124,052**	123,504	121,625
Other external assets	**3,415**	3,528	3,361
External assets	**127,467**	127,032	124,986
Customer deposits	**103,260**	100,907	99,779
Other external liabilities	**19,148**	19,296	22,531
External liabilities	**122,408**	120,203	122,310
Risk weighted assets	**59,887**	62,075	66,750
Average gross loans and advances[1]	**123,167**	122,770	123,073
Average deposits and other borrowings[1]	**105,628**	105,751	106,417
Net funds management income	**90**	93	92
Funds under management	**35,328**	36,448	37,159
Average funds under management	**35,704**	36,553	36,005
Ratios			
Return on average RWA	**2.64%**	2.34%	2.31%
Net interest margin	**2.60%**	2.57%	2.56%
Operating expenses to operating income	**38.5%**	39.6%	38.0%
Operating expenses to average assets	**1.09%**	1.11%	1.08%
Individual credit impairment charge/(release)	**21**	28	14
Individual credit impairment charge/(release) as a % of average GLA[2]	**0.03%**	0.05%	0.02%
Collective credit impairment charge/(release)	**(25)**	(4)	(10)
Collective credit impairment charge/(release) as a % of average GLA[2]	**(0.04%)**	(0.01%)	(0.02%)
Gross impaired assets	**195**	158	119
Gross impaired assets as a % of GLA	**0.16%**	0.13%	0.10%
Total full time equivalent staff	**6,680**	6,756	6,754

1. *Averages are calculated using predominantly daily averages.*
2. *Credit impairment charge/(release) used in the ratio relates to gross loans and advances and off-balance sheet commitments - undrawn and contingent liabilities.*

Suncorp Bank

	Half Year		
Suncorp Bank	**Mar 25 $M**	**Sep 24 $M**	**Mar 24 $M**
Net interest income[1]	**823**	251	-
Other operating income	**30**	6	-
Operating income	**853**	257	-
Operating expenses[2]	**(433)**	(188)	-
Cash profit before credit impairment and income tax	**420**	69	-
Credit impairment (charge)/release[3]	**(11)**	(243)	-
Cash profit/(loss) before income tax	**409**	(174)	-
Income tax (expense)/benefit	**(123)**	52	-
Cash profit/(loss)	**286**	(122)	-
Balance Sheet			
Net loans and advances	**71,517**	70,871	-
Other external assets[4]	**17,268**	16,314	-
External assets	**88,785**	87,185	-
Customer deposits	**55,586**	54,715	-
Other external liabilities	**26,897**	26,895	-
External liabilities	**82,483**	81,610	-
Risk weighted assets	**33,280**	33,422	-
Average gross loans and advances[5,6]	**71,327**	23,832	-
Average deposits and other borrowings[5,6]	**62,837**	20,976	-
Ratios			
Return on average RWA	**1.72%**	(2.21%)	n/a
Net interest margin	**2.12%**	1.93%	n/a
Operating expenses to operating income	**50.8%**	73.2%	n/a
Operating expenses to average assets	**1.00%**	1.30%	n/a
Individually assessed credit impairment charge/(release)	**14**	(1)	-
Individually assessed credit impairment charge/(release) as a % of average GLA[7]	**0.04%**	(0.01%)	n/a
Collectively assessed credit impairment charge/(release)[3]	**(3)**	244	-
Collectively assessed credit impairment charge/(release) as a % of average GLA[3,7]	**(0.01%)**	2.05%	n/a
Gross impaired assets	**123**	66	-
Gross impaired assets as a % of GLA	**0.17%**	0.09%	n/a
Total full time equivalent staff	**2,791**	2,798	-

1. *Includes $50 million from unwinding of acquisition related fair value adjustments recognised against loans and advances, deposits and debt issuance over the residual maturities of the underlying financial assets and liabilities for the September 2024 half.*
2. *Includes $36 million accelerated amortisation expense on alignment to the Group's software capitalisation policy for the September 2024 half.*
3. *Includes $244 million credit impairment charge recognised on performing loans and advances for the September 2024 half.*
4. *Includes provisional value of goodwill of $1,205 million as at March 2025 (Sep 24: $1,402 million).*
5. *Averages are calculated using predominantly daily averages.*
6. *Based on 2 months of balances from the date of acquisition for the September 2024 half.*
7. *Credit impairment charge/(release) used in the ratio relates to gross loans and advances and off-balance sheet commitments - undrawn and contingent liabilities.*

LIQUIDITY AND CAPITAL RESOURCES

Liquidity risk

Liquidity risk is the risk that the Group is unable to meet its payment obligations as they fall due, including repaying depositors or maturing wholesale debt, or that the Group has insufficient capacity to fund increases in assets. The timing mismatch of cash flows and the related liquidity risk is inherent in all banking operations and is closely monitored by the Group and managed in accordance with the risk appetite set by the ANZBGL Board.

The Group's approach to liquidity risk management incorporates two key components:

- **Scenario modelling of funding sources**

  The Group's liquidity risk appetite is defined by the ability to meet a range of regulatory requirements and internal liquidity metrics mandated by the ANZBGL Board. The metrics cover a range of scenarios of varying duration and level of severity. The objective of this framework is to:

  - Provide protection against shorter term extreme market dislocation and stress.
  - Maintain structural strength in the balance sheet by ensuring that an appropriate amount of longer-term assets are funded with longer-term funding.
  - Ensure that no undue timing concentrations exist in the Group's funding profile.

  Key components of this framework are the Liquidity Coverage Ratio, which is a severe short term liquidity stress scenario, and the Net Stable Funding Ratio, a longer term structural liquidity measure, both of which are mandated by banking regulators including APRA.

- **Liquid assets**

  The Group holds a portfolio of high-quality unencumbered liquid assets in order to protect the Group's liquidity position in a severely stressed environment, as well as to meet regulatory requirements. High Quality Liquid Assets comprise three categories, with the definitions consistent with Basel 3 LCR:

  - Highest-quality liquid assets ("HQLA1"): Cash, highest credit quality government, central bank or public sector securities eligible for repurchase with central banks to provide same-day liquidity.
  - High-quality liquid assets ("HQLA2"): High credit quality government, central bank or public sector securities, high quality corporate debt securities and high-quality covered bonds eligible for repurchase with central banks to provide same-day liquidity.
  - Alternative liquid assets ("ALA"): Eligible securities listed by the RBNZ.

  The Group monitors and manages the size and composition of its liquid assets portfolio on an ongoing basis in line with regulatory requirements and the risk appetite set by the ANZBGL Board.

	Half Year Average[1]		
	Mar 25 $B	**Sep 24 $B**	**Mar 24 $B**
Market Values Post Discount			
HQLA1	**287.0**	250.6	268.2
HQLA2	**15.4**	12.9	11.6
Alternative liquid assets[2]	**3.6**	2.7	1.9
Total liquid assets	**306.0**	266.2	281.7
Cash flows modelled under stress scenario			
Cash outflows	**294.7**	255.1	262.8
Cash inflows	**63.1**	53.4	51.9
Net cash outflows	**231.6**	201.7	210.9
Liquidity Coverage Ratio[3,4]	**132%**	132%	134%

1. *Half year average basis, calculated as prescribed per APRA Prudential Regulatory Standard (APS 210 Liquidity) and consistent with APS 330 requirements.*
2. *Comprised of liquid assets as defined in the RBNZ's Liquidity Policy - Annex: Liquidity Assets - Prudential Supervision Department Document BS13A12.*
3. *All currency Level 2 LCR.*
4. *LCR remained above the regulatory minimum thresholds throughout the periods.*

Funding

The Group targets a diversified funding base, avoiding undue concentrations by investor type, maturity, market source and currency. During the March 2025 half, the Group issued $21.8 billion of term wholesale funding (excluding unsubordinated debt with shorter tenors of 12 to 18 months).

The following table shows the Group's total liabilities and shareholders' equity:

	As at		
	Mar 25 $B	**Sep 24 $B**	**Mar 24 $B**
Wholesale funding instruments[1]			
Unsubordinated debt	**126.7**	116.7	90.8
Subordinated debt[2]	**42.9**	39.7	36.3
Total term debt issuances	**169.6**	156.4	127.1
Central bank term funding[3]	**2.0**	2.5	11.5
Commercial paper	**62.1**	47.8	45.2
Certificates of deposit	**39.6**	42.2	39.1
Total wholesale funding instruments	**273.3**	248.9	222.9
Customer deposits	**757.8**	716.6	641.3
Other liabilities	**201.2**	195.4	155.6
Shareholders' equity	**70.7**	68.8	70.2
Total liabilities and shareholders' equity	**1,303.0**	1,229.7	1,090.0

1. *Includes wholesale funding from the acquisition of Suncorp Bank in March 2025 and September 2024.*
2. *Includes subordinated debt issued by ANZ Bank New Zealand Limited which constitutes tier 2 capital under RBNZ requirements but does not meet the APRA Tier 2 requirements, and $0.8 billion of perpetual subordinated notes issued by ANZ Holdings (New Zealand) Limited in the September 2024 half.*
3. *Includes RBA TFF that was fully repaid in the September 2024 half (Sep 24: nil; Mar 24: $8.1 billion), RBNZ FLP of $1.8 billion (Sep 24: $2.3 billion; Mar 24: $3.2 billion) and TLF of $0.2 billion (Sep 24: $0.2 billion; Mar 24: $0.3 billion).*

Net Stable Funding Ratio

The following table shows the Level 2 NSFR composition:

	As at		
	Mar 25 $B	Sep 24 $B	Mar 24 $B
Required Stable Funding[1]			
Retail & small and medium enterprises, corporate loans with 65% RSF factor[2]	**266.3**	261.1	218.3
Retail & small and medium enterprises, corporate loans with 85% RSF factor[2]	**231.1**	221.4	206.1
Other lending[3]	**58.7**	58.4	56.2
Liquid assets	**20.7**	17.9	15.1
Other assets[4]	**53.7**	48.4	46.8
Total Required Stable Funding	**630.5**	607.2	542.5
Available Stable Funding[1]			
Retail & small and medium enterprise customer deposits	**364.8**	357.0	308.9
Corporate, public sector entities & operational deposits	**143.4**	133.9	128.5
Central bank & other financial institution deposits	**6.7**	6.9	6.4
Term funding[5]	**100.4**	94.2	81.5
Short term funding & other liabilities	**14.5**	10.5	12.4
Capital	**107.6**	102.3	102.7
Total Available Stable Funding	**737.4**	704.8	640.4
Net Stable Funding Ratio[6]	**117%**	116%	118%

1. *NSFR factored balance as per APRA Prudential Regulatory Standard APS 210 Liquidity.*
2. *Risk weighting as per APRA Prudential Regulatory Standard APS 112 Capital Adequacy: Standardised Approach to Credit Risk.*
3. *Includes loans to financial institutions and central banks and non-performing loans.*
4. *Includes off-balance sheet items, net derivatives and other assets.*
5. *Includes balances from the drawdown of the RBA and RBNZ Funding Facilities (TFF, FLP and TLF).*
6. *The regulatory minimum NSFR is 100%.*

Term debt maturity profile

The amounts disclosed below represent the outstanding principal of term debt issued by the Group, including Suncorp Bank, under its term funding programs, and drawdowns under the RBNZ's TLF and FLP on or before 31 March 2025. For the avoidance of doubt, this profile excludes commercial paper issuance and short-dated issuance of the Group's long-term programs, and the amounts do not include interest cash flows. For the purposes of this maturity profile, foreign currency denominated term debt has been translated into Australian Dollars using spot foreign exchange rates as at 31 March 2025.

Contractual maturity ($M)[1]	FY25	FY26	FY27	FY28	FY29	After 2029	Total
Unsubordinated debt and central bank term funding[2]	18,502	35,153	28,537	22,884	10,517	17,742	133,335
Subordinated debt[3]	1,990	6,722	3,405	3,587	5,573	15,044	36,321
Total	**20,492**	**41,875**	**31,942**	**26,471**	**16,090**	**32,786**	**169,656**

1. *The maturity profile is presented as the total amount of term debt scheduled to mature in the relevant fiscal year ending 30 September. The maturity profile for all callable debt is presented based on the next callable date.*
2. *Includes transferable certificates of deposit and drawdowns of the RBNZ's TLF and FLP included as "Deposits and other borrowings" in the balance sheet.*
3. *The maturity profile excludes additional Tier 1 capital.*

	As at 31 March 2025		
ANZBGL credit ratings	**Short-Term**	**Long-Term**	**Outlook**
Moody's Investors Service	P-1	Aa2	Stable
S & P Global Ratings	A-1+	AA-	Stable
Fitch Ratings	F1+	AA-	Stable

A rating is not a recommendation to buy, sell or hold securities and may be subject to suspension, reduction or withdrawal at any time by an assigning rating agency and any rating should be evaluated independently of any other information.

Capital management

Qualifying Capital	As at Mar 25 $M	Sep 24 $M	Mar 24 $M
Tier 1			
Shareholders' equity and non-controlling interests	**70,712**	68,760	70,202
Prudential adjustments to shareholders' equity	**(601)**	(721)	(648)
Gross Common Equity Tier 1 capital	**70,111**	68,039	69,554
Deductions	**(14,882)**	(13,570)	(11,142)
Common Equity Tier 1 capital	**55,229**	54,469	58,412
Additional Tier 1 capital	**7,443**	8,207	8,297
Tier 1 capital	**62,672**	62,676	66,709
Tier 2 capital	**32,831**	29,189	28,223
Total qualifying capital	**95,503**	91,865	94,932
Capital adequacy ratios (Level 2)			
Common Equity Tier 1	**11.8%**	12.2%	13.5%
Tier 1	**13.4%**	14.0%	15.4%
Tier 2	**7.0%**	6.5%	6.5%
Total capital ratio	**20.4%**	20.6%	21.9%
Risk weighted assets	**468,999**	446,582	432,779

Comparison of March 2025 with September 2024

The Group's CET1 ratio decreased -42 bps to 11.78% during the March 2025 half. Key drivers of the movement in the CET1 ratio were:

- Statutory profit increased the CET1 ratio by +80 bps.
- Higher underlying RWA usage (excluding impact of Markets RWA and foreign currency translation) decreased the CET1 ratio by -30 bps driven by lending growth in the Institutional, Australia Retail and New Zealand divisions, partially offset by lower IRRBB RWA.
- Markets RWA usage decreased the CET1 ratio by -4 bps as increase driven by credit RWA was partially offset by lower traded market risk RWA.
- Payment of the 2024 final dividend reduced the CET1 ratio by -55 bps.
- Capital deductions and offsetting RWA initiatives reduced the CET1 ratio by net -14 bps driven by Suncorp Bank acquisition related adjustment impacts, higher deferred tax assets and loss in FVOCI reserves.
- An increase in the capital floor decreased the CET1 ratio by -19 bps, as volume growth increased standardised RWA more than IRB RWA and IRRBB RWA was lower.

Inclusive of the total NOHC surplus capital the CET1 capital ratio is 12.00%, which includes +4 bps for the NOHC surplus capital and +18 bps for the remaining $832 million of the $2.0 billion share buy-back announced in the September 2024 half.

The additional $250 million operational risk capital overlay (announced on 3 April 2025) increases operational risk RWA by $3.1 billion (inclusive of the capital floor impact the net RWA increase is $2.3 billion) and is applicable from 30 April 2025.

Leverage ratio

At 31 March 2025, the Group's APRA Leverage Ratio was 4.4% which is above the 3.5% APRA minimum for IRB ADIs which includes the ANZ Bank Group. The following table summarises the Group's APRA Leverage Ratio calculation:

	As at		
	Mar 25 $M	Sep 24 $M	Mar 24 $M
Tier 1 Capital (net of capital deductions)	**62,672**	62,676	66,709
On-balance sheet exposures (excluding derivatives and securities financing transaction exposures)	**1,154,165**	1,096,917	984,875
Derivative exposures	**60,663**	52,478	59,357
Securities financing transaction exposures	**74,612**	65,015	58,995
Other off-balance sheet exposures	**138,394**	129,727	124,894
Total exposure measure	**1,427,834**	1,344,137	1,228,121
APRA Leverage Ratio	**4.4%**	4.7%	5.4%

Comparison of March 2025 with September 2024

APRA leverage ratio decreased -27 bps during the March 2025 half. Key drivers of the movement were:

- Net organic capital generation (largely from Level 2 statutory profit and movements in capital deductions), less dividends paid increased the leverage ratio by +8 bps,
- Net Additional Tier 1 capital impact (ANZ Capital Notes 5 redemption) decreased the leverage ratio by -7 bps,
- Growth in exposures (excluding the impacts from foreign currency translation) decreased the leverage ratio by -21 bps driven by lending growth, mainly in the Australia Retail and Institutional divisions, and Markets exposure growth, and
- Net other impacts decreased the leverage ratio by -7 bps.

Summary

Refer to “Section 4: Directors, Senior Management/Executives and Employees” on pages 78 to 83 of the Group’s 2024 Annual U.S. Disclosure Document for a comprehensive discussion of the Group’s Directors, Senior Management and Executives, and Corporate Governance.

During the period since the 2024 Annual U.S. Disclosure Document to the date of this U.S. Disclosure Document, there were no material changes to these matters with the exception of the following:

Changes to Directors

Ms Jane Halton ceased as a Non-Executive Director of ANZBGL on 31 March 2025 and Mr Shayne Elliott ceased as Chief Executive Officer and Executive Director of ANZBGL on 11 May 2025. Ms Alison Gerry was appointed a Non-Executive Director of ANZBGL on 9 May 2025. Mr Nuno Matos was appointed as Chief Executive Officer and Executive Director of ANZBGL on 12 May 2025.

The names of the Directors of ANZBGL who held office during and since the end of the half year are:

Mr P. D. O’Sullivan, Chairman

Mr N. G. M. S. A. Matos, Executive Director and Chief Executive Officer, appointed 12 May 2025

Mr S. C. Elliott, Executive Director and Chief Executive Officer, ceased 11 May 2025

Mr J. P. Cincotta, Director

Ms A. R. Gerry, Director, appointed 9 May 2025

Mr R. B. M. Gibb, Director

Ms S. J. Halton, AO PSM Director, ceased 31 March 2025

Mr G. K. Hodges, Director

Ms H. S. Kramer, Director

Ms C. E. O’Reilly, Director

Mr J. P. Smith, Director

Mr S. A. St John, Director

With the exception of Mr Graham Hodges and Mr John Cincotta, each Director of ANZBGL also serves as a Director of ANZGHL.

Changes to Senior Management and Executives

Mr Shayne Elliott ceased as Chief Executive Officer and Executive Director of ANZBGL on 11 May 2025, and will cease his employment with ANZ on 30 September 2025.

Mr Nuno Matos was appointed as Chief Executive Officer and Executive Director of ANZBGL on 12 May 2025. With more than 30 years’ experience across retail, commercial and wholesale banking, Mr Matos was most recently CEO of Wealth and Personal Banking at HSBC where he was responsible for 87,000 employees serving approximately 40 million customers across 35 markets. Mr Matos joined HSBC in 2015 from Santander where he was most recently Global Head of Consumer in its Retail and Commercial Division. At HSBC Mr Matos held senior roles including Chief Executive Officer of HSBC Bank plc and HSBC Europe, where he oversaw the transformation of its European business. He had previously also served as CEO Mexico, one of HSBC’s largest markets, and Regional Head of Retail Banking in Latin America. Mr Matos has worked in many different markets including Hong Kong, the United Kingdom, the United States, Spain, France, Brazil, Mexico and Peru.

Industrial Relations Developments

Australia

In Australia, terms and conditions of employment, including salaries, for some or all employees may be negotiated between unions and management as part of a collective enterprise bargaining agreement (“EBA”), subject to majority employee approval. In Australia, ANZBGL has had an EBA in place for a number of years, setting out minimum terms and conditions of employment for its Group 4, 5 and 6 employees (i.e., junior management and non-management employees), which is approximately 91% of employees in Australia.

In August 2023, ANZBGL agreed to a new EBA called the *ANZ Enterprise Agreement 2023-2027 (Australia)* (“2023 ANZ EBA”) with the Finance Sector Union (“FSU”), to replace the previous *ANZ Enterprise Agreement 2015-2016 (Australia)*, which had been varied in September 2017 and continued to operate until the 2023 ANZ EBA commenced operation. The 2023 ANZ EBA covers the same population of employees but has been updated to reflect new employment laws in Australia and provides employees with improved leave and other benefits. The 2023 ANZ EBA was put to an employee ballot in September 2023 with 91% of employees who voted endorsing it. The 2023 ANZ EBA was approved by the Fair Work Commission and commenced operation on 26 October 2023. The 2023 ANZ EBA has a nominal expiry date of 30 September 2027. Once that date passes, the 2023 ANZ EBA will still continue to operate, but ANZBGL, the FSU and the relevant ANZBGL employees in Australia may then commence bargaining for a new replacement EBA.

On 31 July 2024, completion occurred for the purchase of Suncorp Bank and approximately 3,000 employees transferred from Suncorp Group Ltd to the ANZ Group in Australia (specifically into Norfina Ltd). The 2015 Suncorp Group Enterprise Agreement expired in 2018. Norfina Ltd commenced bargaining with the FSU, employee bargaining representatives and the relevant employees for a replacement agreement in November 2024. It is expected that the replacement agreement will commence in late 2025.

There are no significant disputes between management and labour unions in Australia.

New Zealand

The large majority of New Zealand employees are covered by individual employment agreements. ANZ Bank New Zealand’s collective employment agreement with FIRST Union, which covers approximately 12% of New Zealand employees, was renewed effective as of 1 August 2024, expiring on 31 July 2026. Bargaining for renewal of this agreement will commence in June 2026.

There are no significant disputes between management and labour unions in New Zealand.

Rest of World

There are no significant disputes between management and labour unions in any of the countries located in the Rest of World geography.

INSPECTION OF DOCUMENTS

Any public documents referred to in this U.S. Disclosure Document may be inspected by contacting the Company Secretary in writing, addressed to the Company Secretary, Australia and New Zealand Banking Group Limited, Level 9, 833 Collins Street, Docklands, Victoria 3008, Australia.

ORGANISATIONAL STRUCTURE

ANZBGL is indirectly owned and controlled by ANZGHL. See "Section 2: Information on the Group – Overview" for a diagram summarising the composition of the ANZ Group.

DIVIDEND DISTRIBUTION POLICY

Subject to the limitations set out below, the Board of Directors of ANZBGL will determine the amount and timing of dividend distributions to holders of ordinary shares. As at the date of this U.S. Disclosure Document, ANZ Bank HoldCo, which is in turn wholly owned by ANZGHL, is ANZBGL's sole shareholder.

ANZBGL must not pay a dividend unless:

- ANZBGL's assets exceed its liabilities immediately before the dividend is declared and the excess is sufficient for the payment of the dividend; and
- the payment of the dividend is fair and reasonable to ANZBGL's shareholders as a whole; and
- the payment of the dividend does not materially prejudice ANZBGL's ability to pay its creditors.

Payment of a dividend on ordinary shares may also be restricted or constrained by the terms of ANZBGL's hybrid securities and APRA prudential standards.

RELATED PARTY TRANSACTIONS

Related Entities Transactions

From time to time, ANZBGL or its subsidiaries may enter into agreements with other members of the ANZ Group. Following the Restructure, a number of transactions and arrangements exist between ANZBGL and ANZ Group entities, including leasing arrangements, funding activities and deposits being held by ANZBGL.

Key management personnel loan transactions

Loans made to directors of ANZBGL and other Key Management Personnel ("KMP") of the Group are made in the ordinary course of business and on normal commercial terms and conditions that are no more favourable than those given to other employees or customers, including the term of the loan, security required and the interest rate. No amounts have been written off during the period, or individual provision raised in respect of these balances.

Other transactions of key management personnel and their related parties

Other transactions with KMP and their related parties included amounts paid to the Group in respect of investment management service fees, brokerage and bank fees and charges. These transactions are conducted on normal commercial terms and conditions no more favourable than those given to other employees or customers. The Group has reimbursed KMP for the costs incurred for security and secretarial services associated with the performance of their duties.

There have been no transactions with related parties that are significant to understanding the changes in financial position and performance of the Group since 30 September 2024.

Associates

Transactions conducted with all associates were on terms equivalent to those made on an arm's length basis.

For further information on related party transactions, refer to Note 31 of the 2024 Financial Report (attached to the 2024 Annual U.S. Disclosure Document as part of Annex A).

CHANGE IN CONTROL

There are no arrangements known to the Group, the operation of which may at a subsequent date result in a change in control of the Group.

LEGAL PROCEEDINGS

There are outstanding court proceedings, claims and possible claims for and against the Group. Where relevant, expert legal advice has been obtained and, in the light of such advice, provisions and/or disclosures as deemed appropriate have been made. In some instances, we have not disclosed the estimated financial impact of the individual items either because it is not practicable to do so or because such disclosure may prejudice the interests of the Group.

Refer to Note 32 of the 2024 Financial Report (attached to the 2024 Annual U.S. Disclosure Document as part of Annex A) for a description of contingent liabilities and contingent assets as at 30 September 2024. Refer to Note 17 of the Condensed Consolidated Financial Statements (attached as part of the Annex to this U.S. Disclosure Document) for a description of contingent liabilities and contingent assets as at 31 March 2025.

A summary of some of those contingent liabilities is set out below.

- **Regulatory and customer exposures**

  The Group regularly engages with its domestic and international regulators and other statutory and supervisory bodies. The nature of these regulatory interactions can be wide ranging and include regulatory investigations, surveillance and reviews, reportable situations, formal and informal inquiries and regulatory supervisory activities in Australia and globally. The Group also receives notices and requests for information from its regulators and other bodies from time to time as part of both industry-wide and Group-specific reviews and makes disclosures to its regulators at its own instigation.

  There has been a recent increase in the number of matters on which the Group has engaged with its regulators. Recent interactions relate to matters including:

  - markets transactions and data reporting;
  - anti-money laundering and counter-terrorism financing obligations, processes and procedures; and
  - non-financial risk management practices including customer service processes relating to complaints, hardship, deceased estates and remediation, compliance with mandatory reporting obligations, the application of interest and fees on certain products and the financial accountability regime.

  The possible exposures associated with the Group's regulatory interactions may include civil enforcement actions, criminal proceedings, fines and penalties, imposition of capital or liquidity requirements, customer remediation, the requirement to conduct independent reviews, sanctions or the exercise of other regulatory powers.

  There may also be exposures to customers, third parties and shareholders which are additional to any regulatory exposures. These could include class actions or claims for compensation or other remedies.

  The outcomes and total costs associated with these possible regulatory, customer and other exposures remain uncertain.

- **South African rate action**

  In February 2017, the South African Competition Commission commenced proceedings against local and international banks including ANZBGL alleging breaches of the cartel provisions of the South African Competition Act in respect of trading in the South African rand. The potential civil penalty or other financial impact is uncertain.

- **Esanda dealer car loan litigation**

  In August 2020, a class action was brought against ANZBGL alleging unfair conduct, misleading or deceptive conduct and equitable mistake in relation to the use of flex commissions in dealer arranged Esanda car loans. An agreement to settle the claim was reached in October 2024. ANZBGL will pay $85 million in settlement, which is covered by existing provisions held at 31 March 2025. The settlement is without admission of liability and remains subject to court approval.

- **OnePath superannuation litigation**

  In December 2020, a class action was brought against OnePath Custodians, OnePath Life and ANZBGL alleging that OnePath Custodians breached its obligations under superannuation legislation, and its duties as trustee, in respect of superannuation investments and fees. The claim also alleges that ANZBGL was involved in some of OnePath Custodians' investment breaches. An agreement to settle the claim was reached in October 2024. ANZBGL will contribute $14 million to the settlement, which is covered by existing provisions held at 31 March 2025. The settlement is without admission of liability and remains subject to court approval.

- **New Zealand loan information litigation**

  In September 2021, a representative proceeding was brought against ANZ Bank New Zealand, alleging breaches of disclosure requirements under consumer credit legislation in respect of variation letters sent to certain loan customers. ANZ Bank New Zealand is defending the allegations.

- **Security recovery actions**

  Various claims have been made or are anticipated, arising from security recovery actions taken to resolve impaired assets. These claims will be defended.

- **Warranties and indemnities**

  The Group has provided warranties, indemnities and other commitments in favour of the seller/purchaser and other persons in connection with various acquisitions/disposals of businesses and assets and other transactions, covering a range of matters and risks. It is exposed to claims under those warranties, indemnities and commitments, some of which are currently active. The outcomes and total costs associated with these exposures remain uncertain.

EXCHANGE CONTROLS AND RESTRICTIONS ON PAYMENTS

There are currently no general Australian exchange control regulations in force that restrict the payment of dividends, interest or other remittances to holders of ANZBGL's securities. Economic and trade sanctions are, however, implemented in Australia from time to time to reflect Australian public policy, and operate to prohibit the entry into certain transactions with specified persons or entities without the consent of the applicable Australian regulatory body. In some cases, contravention of these sanctions constitutes a criminal offence.

Under Sections 102.6 and 102.7 of the Australian Criminal Code (contained in the *Criminal Code Act 1995* of Australia) ("Criminal Code Act"), a person commits a criminal offence if the person intentionally receives funds from, makes funds available to, collects funds for or on behalf of, or provides support or resources to a terrorist organisation in circumstances where the person knows, or is reckless as to whether, the organisation is a terrorist organisation.

An organisation is a terrorist organisation if it is directly or indirectly engaged in, preparing, planning, assisting in or fostering the doing of a terrorist act, or is prescribed as a terrorist organisation in regulations under the Criminal Code Act.

Economic and trade sanctions and restrictions on payments that are currently in force in Australia include the following:

1. The *Autonomous Sanctions Act 2011* of Australia and *Autonomous Sanctions Regulations 2011* of Australia prohibit dealing with certain "sanctioned" vessels and "designated" persons or entities by directly or indirectly making assets (including shares and securities) available to or for their benefit without a permit, including:

   a) persons who have been indicted for an offence by or within the jurisdiction of the International Criminal Tribunal for the former Yugoslavia ("ICTY") or who are subject to an Interpol arrest warrant related to such an offence within the jurisdiction of the ICTY, persons who are suspected of assisting persons who have been indicted by the ICTY and are not currently detained by the ICTY, as well as certain supporters of the former Milosevic regime;

   b) persons or entities engaging (or who have engaged) in activities that seriously undermine democracy, respect for human rights and the rule of law in Zimbabwe;

   c) certain persons or entities associated with the weapons of mass destruction or missiles program of North Korea, or have assisted or are assisting North Korea to violate or evade certain United Nations Resolutions;

   d) certain persons associated with the Myanmar regime, including current and former ministers, senior officials in security or corrections agencies, senior officials or executives in a state-owned or military owned enterprise and current or former military officers of particular ranks, and immediate family members of such persons;

   e) certain persons or entities who have contributed or are contributing to Iran's nuclear or missile programs, have assisted or are assisting Iran to violate certain United Nations Resolutions, are engaging in, responsible for or complicit in the oppression of women and girls in Iran, the general oppression of people in Iran or the undermining of good governance or the rule of law in Iran, or are assisting or have assisted Iran to threaten or undermine the sovereignty or territorial integrity of another country;

   f) certain close associates of the former Qadhafi regime, entities under the control of the Qadhafi family and persons or entities who have assisted or are assisting in the violation of certain United Nations Resolutions with respect to Libya and immediate family members of such persons;

   g) certain persons or entities providing support to the Syrian regime or responsible for human rights abuses in Syria;

   h) certain persons or entities associated with the Russian government, including current or former ministers, senior government officials, persons who are or have been engaged in an activity or performing a function that is of economic or strategic significance to Russia, and immediate family members of such persons; and

   i) persons or entities responsible for, or complicit in, the threat to the sovereignty and territorial integrity of Ukraine.

2. The Minister for Foreign Affairs also has the ability to designate a person or entity that, for the purposes of the *Autonomous Sanctions Regulations 2011* of Australia:

   a) has contributed to the proliferation of weapons of mass destruction;

   b) has caused or attempted to cause, assisted with causing or with attempting cause, or has otherwise been complicit in a significant cyber incident;

   c) has engaged in, has been responsible for or has been complicit in an act that constitutes a serious violation or serious abuse of a person's right to life, right not to be subjected to torture or degrading treatment or punishment, or right not to be held in slavery; or

   d) has engaged in, has been responsible for or has been complicit in an act of corruption that is serious,

   and in certain circumstances immediate family members or persons or entities that have obtained a financial or other benefit.

3. Under Part 4 of the *Charter of the United Nations Act 1945* of Australia, the *Charter of the United Nations (Dealing with Assets) Regulations 2008* of Australia provide for sanctions against using or dealing with financial or other assets of persons or entities listed by the Minister for Foreign Affairs in the Commonwealth of Australia Gazette from time to time. Under Part 3 of the *Charter of the United Nations Act 1945* of Australia and pursuant to specific regulations, it is prohibited to make certain supplies (which may include financial supplies) in respect of certain countries, including:

   a) Democratic Republic of the Congo (see the *Charter of the United Nations (Sanctions – Democratic Republic of the Congo) Regulations 2008* of Australia);

   b) North Korea (see the *Charter of the United Nations (Sanctions – Democratic People's Republic of Korea) Regulations 2008* of Australia);

   c) Sudan (see the *Charter of the United Nations (Sanctions – Sudan) Regulations 2008* of Australia);

   d) Iran (see the *Charter of the United Nations (Sanctions – Iran) Regulation 2016* of Australia);

   e) Iraq (see the *Charter of the United Nations (Sanctions – Iraq) Regulations 2008* of Australia);

   f) Al-Qaida, ISIL and the Taliban (see the *Charter of the United Nations (Sanctions – ISIL (Da'esh) and Al-Qaida) Regulations 2008* of Australia and the *Charter of the United Nations (Sanctions – the Taliban) Regulation 2013* of Australia);

   g) Somalia (see the *Charter of the United Nations (Sanctions – Somalia) Regulations 2008* of Australia);

   h) Lebanon (see the *Charter of the United Nations (Sanctions – Lebanon) Regulations 2008* of Australia);

i) Libya (see the *Charter of the United Nations (Sanctions – Libya) Regulations 2011* of Australia);

j) Central African Republic (see the *Charter of the United Nations (Sanctions – Central African Republic) Regulation 2014* of Australia);

k) Yemen (see the *Charter of the United Nations (Sanctions – Yemen) Regulation 2014* of Australia);

l) South Sudan (see the *Charter of the United Nations (Sanctions – South Sudan) Regulation 2015* of Australia);

m) Syria (see the *Charter of the United Nations (Sanctions – Syria) Regulation 2015* of Australia); and

n) Mali (see the *Charter of the United Nations (Sanctions – Mali) Regulations 2018* of Australia).

4. Under the AML/CTF Act, transfer of physical currency or digital currency (cryptocurrency) of $10,000 (or the foreign equivalent) and above must be reported by certain persons (including ANZBGL) to AUSTRAC.

MATERIAL CONTRACTS

There have been no material contracts entered into by the Group in the past two years, other than in the ordinary course of its business, upon which it is substantially dependent.

CYBERSECURITY RISK MANAGEMENT

Cybersecurity Risk Management Processes

ANZBGL has many layers of comprehensive security controls to protect and defend the bank and prevent unauthorised access to ANZBGL’s systems and information.

ANZBGL maintains a multi-disciplinary central security function, whose services include providing advice, guidance and tools that enable preventative and detective capability to analyse threat intelligence, responses to operational threats and incidents, protection of information and systems, and active testing of ANZBGL’s security through independent penetration testing as well as red team exercises (which simulate a threat actor). Service catalogues are reviewed periodically to keep pace with the changing cyber threats and risk landscape. Additional teams across the bank also assist in strengthening and supporting the overall security posture for ANZBGL.

Information Security (including risks and controls related to third parties with which ANZBGL works) is a specific non-financial risk theme within ANZBGL's operational risk framework.

Under this framework, requirements to manage information security risks and controls are defined and monitored by the Group Chief Information Security Officer (“CISO”) and cascaded across the Group, as appropriate. These controls include requirements for periodic risk assessments and as part of change and delivery. Risk management requirements are informed through detailed threat, intelligence and scenario analysis to determine adequate coverage of controls.

The Group CISO monitors implementation of the Group’s information security policy and associated standards with the objective of ensuring that the Group’s information security controls, security exposures and risk management processes are effective and sustainable. This is managed via the three lines of defence:

- First Line – The ‘Business’ has first line of defence responsibilities with Assurance functions embedded within divisions and overseen by divisional risk management committees, providing assurance on the appropriate operation of information security management processes. Assurance activities, covering the implementation and effectiveness of controls are based on ANZBGL's operational risk management framework.
- Second Line – ‘Enterprise Risk’ (being the dedicated and independent operational risk and compliance management function) oversees and guides the first line to enable consistent application of information security management processes and the operational risk management framework. Enterprise Risk reviews and challenges the first line self-assurance activities to confirm their effectiveness.
- Third Line – ‘Internal Audit’ conducts independent reviews of the adequacy of the key information security controls and risk management processes in accordance with the audit plan.

The Group CISO is also informed through maintaining a 24/7 sophisticated Security Operations Centre (“SOC”) responsible for ensuring that potential security incidents are correctly identified, analysed, defended, investigated and reported. Critically, the SOC must keep up with the latest threat intelligence and use this information to improve internal detection and defence mechanisms. The Group’s policy also requires service providers to report information security incidents in a timely manner to ANZBGL that may impact the Group.

Further, in addition to an in-house information security workforce, ANZBGL augments its workforce by leveraging its security service providers, on an as needed basis to ensure the Group has specialist niche skills when required and the ability to surge as required in times of heightened threat. This includes independent external auditors, penetration testing, Distributed Denial of Service (DDoS) attack prevention, and periodic engagement of external security consultants to conduct independent assessments and industry benchmarking.

ANZBGL’s incident management framework includes a notification process for regulators (e.g. APRA) in the event of an information security incident or material information security control weakness.

Cybersecurity Risk Management Governance

The ANZBGL Board is ultimately responsible for ANZBGL's information security and is actively engaged in overseeing this function with the CISO periodically presenting key information security updates, information security control effectiveness and risk indicators, and facilitating ANZBGL Board education on security. Operationally, the ANZBGL Board delegates oversight for information security to the Digital Business and Technology Committee (“DBTC”) and the Board Risk Committee (“BRC”). The information security responsibilities of DBTC and BRC are documented in the respective Committee charters.

The role of the DBTC is to assist the ANZBGL Board in the effective discharge of its responsibilities by providing oversight of the Group’s digital transformation, data, technology, technology-related innovation and information/cyber security strategies.

The role of the BRC is to assist the ANZBGL Board in the effective discharge of its responsibilities by providing oversight of the implementation and operation of the Group’s risk management framework, including for business, market, credit, equity and other investment, financial, operational, compliance, liquidity and reputational risk management and for management of the Group’s compliance obligations. The BRC also assists the ANZBGL Board by providing objective non-executive oversight of the implementation by management of the Group’s risk management framework and its related operation, and by enabling an institution-wide view of the Group’s current and future risk position relative to its risk appetite and capital strength.

The BRC is provided with a periodic (usually semi-annual) update on cyber and information security risk, including the changing threat landscape to information security and the regulatory environment, progress on security capability uplift and control testing, and impact on finance, resources and the Group’s security risk position.

The DBTC is provided with a periodic (usually quarterly) update, including information security metrics reporting, progress on security strategy execution, technology governance, operations and cyber related incidents, and initiatives on technology and people capability.

Dr Maria Milosavljevic is the Group’s CISO. The CISO reports directly to the Group Executive, Technology and Business Services. The CISO is an expert in cyber security, with a breadth of experience across data and security having held several roles (including as CISO) in both government and the private sector and has a track record of building and running cyber, data and analytics operations and deep connections with the cyber security community locally and internationally.

AASB - Australian Accounting Standards Board. The term "AASB" is commonly used when identifying Australian Accounting Standards issued by the AASB.

ADI - Authorised Deposit-taking Institution as defined by APRA.

ANZBGL means Australia and New Zealand Banking Group Limited (ACN 005 357 522).

ANZ Bank New Zealand means ANZ Bank New Zealand Limited.

ANZ Bank New Zealand Group means ANZ Bank New Zealand and each of its subsidiaries.

ANZ Bank Group means ANZ Bank HoldCo and each of its subsidiaries, including ANZBGL and ANZ Bank New Zealand.

ANZ Bank HoldCo means ANZ BH Pty Ltd (ACN 658 939 952), a non-operating intermediate holding company owned by ANZGHL and which owns the ANZ Bank Group.

ANZ Board prior to the Restructure means the board of directors of ANZBGL and after the Restructure means the board of directors of ANZGHL.

ANZGHL means ANZ Group Holdings Limited (ACN 659 510 791).

ANZ Non-Bank Group means ANZ Non-Bank HoldCo and each of its subsidiaries, and ANZ ServiceCo.

ANZ Non-Bank HoldCo means ANZ NBH Pty Ltd (ACN 658 941 096), a non-operating intermediate holding company owned by ANZGHL and which owns certain non-banking subsidiaries.

ANZ ServiceCo means ANZ Group Services Pty Ltd (ACN 658 940 900).

APRA - Australian Prudential Regulation Authority.

APRA Leverage Ratio compares Tier 1 Capital to the "exposure measure" (expressed as a percentage) as defined by APS 110. It is a designed as a non-risk based supplement or backstop to the current risk based capital requirements and is intended to restrict the build-up of excessive leverage in the banking system.

APS means banking prudential standard.

Cash and cash equivalents comprise coins, notes, money at call, balances held with central banks, liquid settlement balances (readily convertible to known amounts of cash which are subject to insignificant risk of changes in value) and securities purchased under agreements to resell (reverse repurchase agreements) in less than three months.

Collectively assessed allowance for expected credit loss represents the ECL, which incorporates forward-looking information and does not require an actual loss event to have occurred for a credit loss provision to be recognised.

Company means ANZBGL.

Covered bonds are bonds issued by an ADI to external investors secured against a pool of the ADI's assets (the cover pool) assigned to a bankruptcy remote special purpose entity. The primary assets forming the cover pool are mortgage loans. The mortgages remain on the issuer's balance sheet. The covered bond holders have dual recourse to the issuer and the cover pool assets. The mortgages included in the cover pool cannot be otherwise pledged or disposed of but may be repurchased and substituted in order to maintain the credit quality of the pool. The Group issues covered bonds as part of its funding activities.

CPS means cross-industry prudential standard.

Credit risk is the risk of financial loss resulting from the failure of the Group's customers and counterparties to honour or perform fully the terms of a loan or contract.

Credit risk weighted assets ("Credit RWA") represent assets which are weighted for credit risk according to a set formula as prescribed in APS 112/113.

Customer deposits represent term deposits, other deposits bearing interest, deposits not bearing interest and borrowing corporations' debt excluding securitisation deposits.

Customer remediation includes provisions for expected refunds to customers, remediation project costs and related customer and regulatory claims, penalties and litigation outcomes.

Expected credit losses ("ECL") – The determination of the ECL is dependent on credit deterioration since origination, according to the following three-stage approach:

- Stage 1: At the origination of a financial asset, and subsequently where there has not been a Significant Increase in Credit Risk ("SICR") since origination, an allowance for ECL is recognised reflecting the ECL resulting from default events that are possible within the next 12 months from the reporting date. For instruments with a remaining maturity of less than 12 months, ECL are estimated based on default events that are possible over the remaining time to maturity.
- Stage 2: Where there has been a SICR since origination, an allowance for ECL is recognised reflecting ECL resulting from all possible default events over the expected life of a financial instrument. If credit risk were to improve in a subsequent period such that the increase in credit risk since origination is no longer considered significant, the exposure returns to a Stage 1 classification with ECL measured accordingly.
- Stage 3: Where there is objective evidence of impairment, an allowance equivalent to lifetime ECL is recognised.

Fair value is an amount at which an asset or liability could be exchanged between knowledgeable and willing parties in an arm's length transaction.

Funding for Lending Programme ("FLP") refers to three-year funding announced by the RBNZ in November 2020 and offered to New Zealand banks, which aimed to lower the cost of borrowing for New Zealand businesses and households.

Gross loans and advances ("GLA") is made up of loans and advances, capitalised brokerage and other origination costs less unearned income.

Group means ANZBGL and each of its subsidiaries.

Group's Position refers to the business, operations, results of operations, reputation, prospects, liquidity, capital resources, financial performance and financial condition of the Group.

Impaired assets are those financial assets where doubt exists as to whether the full contractual amount will be received in a timely manner, or where concessional terms have been provided because of the financial difficulties of the customer.

Impaired loans comprise of drawn facilities where the customer's status is defined as impaired.

Individually assessed allowance for expected credit losses is assessed on a case-by-case basis for all individually managed impaired assets taking into consideration factors such as the realisable value of security (or other credit mitigants), the likely return available upon liquidation or bankruptcy, legal uncertainties, estimated costs involved in recovery, the market price of the exposure in secondary markets and the amount and timing of expected receipts and recoveries.

Interest rate risk in the banking book ("IRRBB") relates to the potential adverse impact of changes in market interest rates on the Group's future net interest income. The risk generally arises from:

1. Repricing and yield curve risk - the risk to earnings or market value as a result of changes in the overall level of interest rates and/or the relativity of these rates across the yield curve;
2. Basis risk - the risk to earnings or market value arising from volatility in the interest margin applicable to banking book items; and
3. Optionality risk - the risk to earnings or market value arising from the existence of stand-alone or embedded options in banking book items.

Level 1 in the context of APRA supervision, means ANZBGL consolidated with certain approved subsidiaries.

Level 2 in the context of APRA supervision, means consolidated ANZ Bank Group excluding insurance and funds management entities, commercial non-financial entities, and certain securitisation vehicles.

Level 3 in the context of APRA supervision, means ANZ Group – the conglomerate group at the widest level.

Major Bank Levy refers to a levy that was introduced by the Australian Government with effect from July 2017 and is imposed on liabilities for certain large banks, including the Group.

Net interest margin is net interest income as a percentage of average interest earning assets.

Net loans and advances represent gross loans and advances less allowance for expected credit losses.

Net Stable Funding Ratio ("NSFR") is the ratio of the amount of available stable funding ("ASF") to the amount of required stable funding ("RSF") defined by APRA. The amount of ASF is the portion of an ADI's capital and liabilities expected to be a reliable source of funds over a one-year time horizon. The amount of RSF is a function of the liquidity characteristics and residual maturities of an ADI's assets and off-balance sheet activities. ADIs must maintain an NSFR of at least 100%.

Net tangible assets equals share capital and reserves attributable to shareholders of ANZBGL less unamortised intangible assets (including goodwill and software).

RBA - Reserve Bank of Australia, Australia's central bank.

RBNZ - Reserve Bank of New Zealand, New Zealand's central bank.

Regulatory deposits are mandatory reserve deposits lodged with local central banks in accordance with statutory requirements.

Restructure means the restructure of the ANZ Group, as part of the establishment of the non-operating holding company, implemented by the scheme of arrangement under the *Corporations Act* between ANZBGL and shareholders on 3 January 2023.

Restructured items comprise facilities in which the original contractual terms have been modified for reasons related to the financial difficulties of the customer. Restructuring may consist of reduction of interest, principal or other payments legally due, or an extension in maturity materially beyond those typically offered to new facilities with similar risk.

Return on average RWA is the profit attributable to shareholders of ANZBGL, divided by average RWA.

Risk weighted assets ("RWA") are risk weighted according to each asset's inherent potential for default and what the likely losses would be in the case of default. In the case of non-asset backed risks (i.e. market and operational risk), RWA is determined by multiplying the capital requirements for those risks by 12.5.

Settlement balances owed to/by ANZ represent financial assets and/or liabilities which are in the course of being settled. These may include trade dated assets and liabilities, vostro accounts and securities settlement accounts.

SME means small and medium enterprises.

Suncorp Bank means SBGH Limited (ACN 145 980 838) and each of its subsidiaries, which were acquired on 31 July 2024.

Term Funding Facility ("TFF") refers to three-year funding announced by the RBA on 19 March 2020 and offered to ADIs in order to support lending to Australian businesses at low cost. The TFF was closed to drawdowns on 30 June 2021.

Term Lending Facility ("TLF") refers to three to five-year funding offered by the RBNZ between May 2020 and July 2021 to promote lending to New Zealand businesses.

ANNEX: CONDENSED CONSOLIDATED FINANCIAL STATEMENTS OF THE GROUP FOR THE HALF YEAR ENDED 31 MARCH 2025 AND INDEPENDENT AUDITOR'S REVIEW REPORT ON THE CONDENSED CONSOLIDATED FINANCIAL STATEMENTS.

Australia and New Zealand Banking Group Limited

CONDENSED CONSOLIDATED FINANCIAL STATEMENTS

For the half year ended 31 March 2025

Australia and New Zealand Banking Group Limited

		Half Year			Movement	
	Note	Mar 25 $M	Sep 24 $M	Mar 24 $M	Mar 25 v. Sep 24	Mar 25 v. Mar 24
Interest income[1]		**32,755**	30,846	29,832	6%	10%
Interest expense		**(23,917)**	(22,709)	(21,932)	5%	9%
Net interest income	2	**8,838**	8,137	7,900	9%	12%
Other operating income[2]	2	**2,315**	2,236	2,248	4%	3%
Operating income		**11,153**	10,373	10,148	8%	10%
Operating expenses	3	**(5,788)**	(5,490)	(5,179)	5%	12%
Profit before credit impairment and income tax		**5,365**	4,883	4,969	10%	8%
Credit impairment (charge)/release	8	**(143)**	(336)	(70)	-57%	large
Profit before income tax		**5,222**	4,547	4,899	15%	7%
Income tax expense	4	**(1,538)**	(1,381)	(1,435)	11%	7%
Profit for the period		**3,684**	3,166	3,464	16%	6%
Comprising:						
Profit attributable to shareholders of the Company		**3,663**	3,145	3,450	16%	6%
Profit attributable to non-controlling interests	13	**21**	21	14	0%	50%

1. *Includes interest income calculated using effective interest method on financial assets measured at amortised cost or fair value through other comprehensive income of $30,294 million for the March 2025 half (Sep 24 half: $28,330 million, Mar 24 half: $27,387 million).*
2. *Other operating income includes Net income from insurance business of $46 million for the March 2025 half (Sep 24 half: $74 million; Mar 24 half: $48 million) and Share of associates' profit/(loss) of $54 million for the March 2025 half (Sep 24 half: $38 million; Mar 24 half: $96 million).*

The notes appearing on pages 17 to 48 form an integral part of the Condensed Consolidated Financial Statements.

Australia and New Zealand Banking Group Limited

	Half Year			Movement	
	Mar 25 $M	Sep 24 $M	Mar 24 $M	Mar 25 v. Sep 24	Mar 25 v. Mar 24
Profit for the period	**3,684**	3,166	3,464	16%	6%
Other comprehensive income					
Items that will not be reclassified subsequently to profit or loss					
Investment securities - equity securities at FVOCI	**84**	128	20	-34%	large
Other reserve movements[1]	**39**	42	(59)	-7%	large
Items that may be reclassified subsequently to profit or loss					
Foreign currency translation reserve	**608**	(552)	(378)	large	large
Cash flow hedge reserve	**289**	994	1,075	-71%	-73%
Other reserve movements	**(116)**	(646)	(128)	-82%	-9%
Income tax attributable to the above items	**(77)**	(129)	(273)	-40%	-72%
Share of associates' other comprehensive income[2]	**(5)**	(6)	(17)	-17%	-71%
Total comprehensive income for the period	**4,506**	2,997	3,704	50%	22%
Comprising total comprehensive income attributable to:					
Shareholders of the Company	**4,493**	2,975	3,701	51%	21%
Non-controlling interests[1]	**13**	22	3	-41%	large

1. *Includes foreign currency translation differences attributable to non-controlling interests of -$8 million for the March 2025 half (Sep 24 half: $1 million; Mar 24 half: -$11 million).*
2. *Share of associates' other comprehensive income, that may be reclassified subsequently to profit or loss, includes:*

	Mar 25 half	*Sep 24 half*	*Mar 24 half*
	$M	*$M*	*$M*
FVOCI reserve gain/(loss)	1	(6)	(4)
Defined benefits gain/(loss)	(6)	-	(13)
Total	**(5)**	**(6)**	**(17)**

The notes appearing on pages 17 to 48 form an integral part of the Condensed Consolidated Financial Statements.

Australia and New Zealand Banking Group Limited

		As at			Movement	
Assets	**Note**	**Mar 25 $M**	**Sep 24 $M**	**Mar 24 $M**	**Mar 25 v. Sep 24**	**Mar 25 v. Mar 24**
Cash and cash equivalents[1]		**195,788**	150,965	137,696	30%	42%
Settlement balances owed to ANZ		**6,225**	5,484	3,809	14%	63%
Collateral paid		**10,464**	10,090	8,241	4%	27%
Trading assets		**45,745**	45,755	42,442	0%	8%
Derivative financial instruments		**49,552**	54,370	47,481	-9%	4%
Investment securities		**155,072**	140,262	117,618	11%	32%
Net loans and advances	7	**820,852**	804,032	715,821	2%	15%
Regulatory deposits		**644**	665	696	-3%	-7%
Investments in associates		**1,479**	1,415	1,405	5%	5%
Current tax assets		**43**	19	45	large	-4%
Deferred tax assets		**3,180**	3,302	3,199	-4%	-1%
Goodwill and other intangible assets		**5,780**	5,421	3,907	7%	48%
Premises and equipment		**2,325**	2,388	2,293	-3%	1%
Other assets		**5,822**	5,417	5,485	7%	6%
Total assets		**1,302,971**	1,229,585	1,090,138	6%	20%
Liabilities						
Settlement balances owed by ANZ		**16,085**	16,188	15,026	-1%	7%
Collateral received		**10,129**	6,583	7,409	54%	37%
Deposits and other borrowings	9	**973,630**	905,166	807,189	8%	21%
Derivative financial instruments		**44,279**	55,254	42,728	-20%	4%
Current tax liabilities		**306**	360	195	-15%	57%
Deferred tax liabilities		**190**	64	59	large	large
Payables and other liabilities		**15,726**	18,594	17,982	-15%	-13%
Employee entitlements		**655**	644	579	2%	13%
Other provisions		**1,704**	1,584	1,660	8%	3%
Debt issuances	10	**169,555**	156,388	127,109	8%	33%
Total liabilities		**1,232,259**	1,160,825	1,019,936	6%	21%
Net assets		**70,712**	68,760	70,202	3%	1%
Shareholders' equity						
Ordinary share capital	13	**27,028**	27,065	29,033	0%	-7%
Reserves	13	**(902)**	(1,678)	(1,510)	-46%	-40%
Retained earnings	13	**43,822**	42,602	41,911	3%	5%
Share capital and reserves attributable to shareholders of the Company		**69,948**	67,989	69,434	3%	1%
Non-controlling interests	13	**764**	771	768	-1%	-1%
Total shareholders' equity		**70,712**	68,760	70,202	3%	1%

1. *Includes Settlement balances owed to ANZ that meet the definition of Cash and cash equivalents.*

The notes appearing on pages 17 to 48 form an integral part of the Condensed Consolidated Financial Statements.

Australia and New Zealand Banking Group Limited

	Half Year		
	Mar 25 $M	**Sep 24 $M**	**Mar 24 $M**
Profit after income tax	**3,684**	3,166	3,464
Adjustments to reconcile to net cash provided by/(used in) operating activities:			
Allowance for expected credit losses	**143**	336	70
Depreciation and amortisation	**545**	488	456
Net derivatives/foreign exchange adjustment	**3,541**	2,386	858
(Gain)/loss on sale from divestments	**-**	-	21
Other non-cash movements	**(7)**	12	(22)
Net (increase)/decrease in operating assets:			
Collateral paid	**372**	(2,230)	262
Trading assets	**(15)**	(3,184)	(20)
Net loans and advances	**(11,808)**	(22,881)	(10,665)
Other assets	**(588)**	323	(591)
Net increase/(decrease) in operating liabilities:			
Deposits and other borrowings	**51,750**	47,592	(4,532)
Settlement balances owed by ANZ	**(240)**	1,273	(4,178)
Collateral received	**2,913**	(471)	(2,897)
Other liabilities	**(2,783)**	(186)	2,196
Total adjustments	**43,823**	23,458	(19,042)
Net cash provided by/(used in) operating activities[1]	**47,507**	26,624	(15,578)
Cash flows from investing activities			
Acquisition of Suncorp Bank, net of cash acquired	**-**	(4,914)	-
Investment securities assets:			
Purchases	**(41,649)**	(40,877)	(43,900)
Proceeds from sale or maturity	**31,629**	24,546	22,996
Proceeds from divestments, net of cash disposed	**-**	18	668
Net investments in other assets	**(242)**	(153)	(451)
Net cash provided by/(used in) investing activities	**(10,262)**	(21,380)	(20,687)
Cash flows from financing activities			
Deposits and other borrowings (repaid) / drawn down	**(510)**	(987)	(27)
Debt issuances:[2]			
Issue proceeds	**25,961**	24,364	26,240
Redemptions	**(19,798)**	(8,728)	(16,639)
Dividends paid	**(2,539)**	(2,468)	(2,784)
On-market purchase of treasury shares	**(118)**	-	(126)
Repayment of lease liabilities	**(172)**	(178)	(164)
Capital return	**-**	(2,000)	-
ANZ Bank New Zealand Perpetual Preference Shares	**-**	-	252
Net cash provided by/(used in) financing activities	**2,824**	10,003	6,752
Net increase/(decrease) in cash and cash equivalents	**40,069**	15,247	(29,513)
Cash and cash equivalents at beginning of period	**150,965**	137,696	168,154
Effects of exchange rate changes on cash and cash equivalents	**4,754**	(1,978)	(945)
Cash and cash equivalents at end of period	**195,788**	150,965	137,696

1. *Net cash provided by/(used in) operating activities includes interest received of $32,582 million (Sep 24 half: $30,296 million; Mar 24 half: $29,361 million), interest paid of $24,129 million (Sep 24 half: $22,250 million; Mar 24 half: $21,287 million) and income taxes paid of $1,785 million (Sep 24 half: $1,146 million; Mar 24 half: $1,779 million) for the March 2025 half.*
2. *Non-cash movements on debt issuances include a loss of $7,014 million for the March 2025 half (Sep 24 half: $2,205 million gain; Mar 24 half: $1,494 million loss) from unrealised movements primarily due to fair value hedge adjustments and foreign exchange differences.*

The notes appearing on pages 17 to 48 form an integral part of the Condensed Consolidated Financial Statements.

Australia and New Zealand Banking Group Limited

	Ordinary share capital $M	Reserves $M	Retained earnings $M	Share capital and reserves attributable to shareholders of the Company $M	Non-controlling interests $M	Total shareholders' equity $M
As at 1 October 2023	29,082	(1,796)	41,277	**68,563**	522	**69,085**
Profit or Loss for the year	-	-	3,450	**3,450**	14	**3,464**
Other comprehensive income for the period	-	299	(48)	**251**	(11)	**240**
Total comprehensive income for the period	-	299	3,402	**3,701**	3	**3,704**
Transactions with equity holders in their capacity as equity holders:						
Dividends paid	-	-	(2,771)	**(2,771)**	(13)	**(2,784)**
Other equity movements:						
Employee share and option plans	(49)	-	-	**(49)**	-	**(49)**
ANZ Bank New Zealand Perpetual Preference Shares[1]	-	-	(4)	**(4)**	256	**252**
Other items	-	(13)	7	**(6)**	-	**(6)**
As at 31 March 2024	29,033	(1,510)	41,911	69,434	768	70,202
Profit or Loss for the year	-	-	3,145	**3,145**	21	**3,166**
Other comprehensive income for the period	-	(198)	28	**(170)**	1	**(169)**
Total comprehensive income for the period	-	(198)	3,173	**2,975**	22	**2,997**
Transactions with equity holders in their capacity as equity holders:						
Dividends paid	-	-	(2,496)	**(2,496)**	(19)	**(2,515)**
Other equity movements:						
Employee share and option plans	32	23	4	**59**	-	**59**
Capital return	(2,000)	-	-	**(2,000)**	-	**(2,000)**
Other items	-	7	10	**17**	-	**17**
As at 30 September 2024	27,065	(1,678)	42,602	**67,989**	771	**68,760**
Profit or Loss for the year	-	-	3,663	**3,663**	21	**3,684**
Other comprehensive income for the period	-	804	26	**830**	(8)	**822**
Total comprehensive income for the period	-	804	3,689	**4,493**	13	**4,506**
Transactions with equity holders in their capacity as equity holders:						
Dividends paid	-	-	(2,472)	**(2,472)**	(20)	**(2,492)**
Other equity movements:						
Employee share and option plans	(37)	(28)	3	**(62)**	-	**(62)**
As at 31 March 2025	27,028	(902)	43,822	**69,948**	764	**70,712**

1. *Perpetual preference shares issued by ANZ Bank New Zealand Limited, a member of the Group, are considered non-controlling interests to the Group. Refer to Note 13 Shareholders' equity for further information.*

The notes appearing on pages 17 to 48 form an integral part of the Condensed Consolidated Financial Statements.

1. Basis of preparation

These Condensed Consolidated Financial Statements:

- have been prepared in accordance with the recognition and measurement requirements of *Australian Accounting Standards (AASs)*;
- should be read in conjunction with ANZBGL's Annual Financial Report for the year ended 30 September 2024 and any public announcements made by ANZBGL and its controlled entities (the Group) for the half year ended 31 March 2025 in accordance with the continuous disclosure obligations under the *Corporations Act 2001* and the *ASX Listing Rules*;
- do not include all notes of the type normally included in an annual report;
- are presented in Australian dollars unless otherwise stated; and
- were approved by the Board of Directors on 7 May 2025.

i) Statement of Compliance

These Condensed Consolidated Financial Statements have been prepared in accordance with the *Corporations Act 2001* and AASB 134 *Interim Financial Reporting* which ensured compliance with IAS 34 *Interim Financial Reporting*.

ii) Rounding of amounts

The amounts contained in these Condensed Consolidated Financial Statements have been rounded to the nearest million dollars, except where otherwise indicated, as permitted by *Australian Securities and Investments Commission Corporations Instrument 2016/191*.

iii) Basis of measurement and presentation

The financial information has been prepared in accordance with the historical cost basis except the following assets and liabilities that are stated at their fair values:

- derivative financial instruments and in the case of fair value hedging, a fair value adjustment made to the underlying hedged item;
- financial instruments held for trading;
- financial instruments designated at fair value through profit and loss (FVTPL);
- financial assets at fair value through other comprehensive income (FVOCI).

In accordance with AASB 119 *Employee Benefits*, defined benefit obligations are measured using the Projected Unit Credit method.

iv) Accounting policies

These Condensed Consolidated Financial Statements have been prepared on the basis of accounting policies and using methods of computation consistent with those applied in the 2024 ANZBGL Annual Report.

v) Use of estimates, assumptions and judgements

The preparation of these Condensed Consolidated Financial Statements requires the use of management judgement, estimates and assumptions impacting the application of accounting policies and financial outcomes. Discussion of the critical accounting estimates and judgements, which include complex or subjective decisions or assessments are provided in the 2024 ANZBGL Annual Report and updated as necessary within these Condensed Consolidated Financial Statements. Such estimates and judgements are reviewed on an ongoing basis.

The global economy continues to face challenges associated with inflation and interest rate uncertainties, continuing trade and geopolitical tensions, and impacts from climate change, which contribute to an elevated level of estimation uncertainty involved in the preparation of these financial statements.

The Group made various accounting estimates in these Condensed Consolidated Financial Statements based on forecasts of economic conditions which reflect expectations and assumptions at 31 March 2025 about future events considered reasonable in the circumstances. Thus there is a considerable degree of judgement involved in preparing these estimates. Actual economic conditions are likely to be different from those forecast since anticipated events frequently do not occur as expected, and the effect of these differences may significantly impact accounting estimates included in these financial statements. The significant accounting estimates predominantly impacted by these forecasts and associated uncertainties are expected credit losses and provisions.

In light of the uncertainties above the assumptions and judgements made in relation to significant accounting estimates are discussed further below. Readers should consider these disclosures in light of the uncertainties described above.

1. Basis of preparation, cont'd

Allowance for expected credit losses

The Group measures the allowance for expected credit losses (ECL) using an expected credit loss impairment model as required by AASB 9 *Financial Instruments*.

The Group's allowance for ECL is included in the table below (refer to Note 8 for further information).

	As at		
	Mar 25 $M	**Sep 24 $M**	**Mar 24 $M**
Collectively assessed	**4,280**	4,247	4,046
Individually assessed	**364**	308	325
Total[1]	**4,644**	4,555	4,371

1. *Includes allowance for ECL for Net loans and advances - at amortised cost, Investment securities - debt securities at amortised cost and Off-balance sheet commitments - undrawn and contingent facilities.*

Individually assessed allowance for ECL

During the March 2025 half, the individually assessed allowance for ECL increased $56 million.

In estimating individually assessed ECL, the Group makes judgements and assumptions in relation to expected repayments, the realisable value of collateral, business prospects for the customer, competing claims and the likely cost and duration of the work-out process.

Collectively assessed allowance for ECL

During the March 2025 half, the collectively assessed allowance for ECL increased $33 million, attributable to $50 million from deterioration in credit risk profile, $47 million from foreign currency translation and other impacts, $17 million from portfolio growth and $14 million net increase in management temporary adjustments for increased uncertainty and economic volatility. This was partially offset by $72 million from a revision to modelling assumptions for the severe scenario and $23 million from a small improvement in base case economic assumptions.

In estimating collectively assessed ECL, the Group makes judgements and assumptions in relation to:

- the selection of an estimation technique or modelling methodology; and
- the selection of inputs for those models, and the interdependencies between those inputs.

The judgements and associated assumptions have been made within the context of the uncertainty of how various factors might impact the global economy, and reflect historical experience and other factors that are considered relevant, including expectations of future events that are believed to be reasonable under the circumstances. The Group's ECL estimates are inherently uncertain and, as a result, actual results may differ from these estimates.

The key judgements and assumptions in estimating collectively assessed ECL are presented below.

Base case economic forecast assumptions

Continuing uncertainties described above increase the risk of the economic forecast resulting in an understatement or overstatement of the ECL balance.

The economic drivers of the base case economic forecasts, reflective of ANZ Economics' view of future macro-economic conditions, used at 31 March 2025 are set out below. For years beyond the near-term forecasts below, the ECL models apply simplified assumptions for the economic conditions to calculate lifetime loss. There is a high level of estimation uncertainties when forming these forecasts.

	Calendar year	Forecast calendar year	
	2024	**2025**	**2026**
Australia			
GDP (annual % change)	1.1	2.1	2.5
Unemployment rate (annual average)	4.0	4.1	4.0
Residential property prices (annual % change)	4.4	0.9	3.8
Consumer price index (annual % change)	3.2	2.4	2.6
New Zealand			
GDP (annual % change)	(0.5)	1.0	3.1
Unemployment rate (annual average)	4.7	5.2	4.7
Residential property prices (annual % change)	(1.1)	6.0	5.0
Consumer price index (annual % change)	2.9	2.6	1.9
Rest of World			
GDP (annual % change)	2.8	2.3	1.9
Consumer price index (annual % change)	3.0	2.5	2.1

1. Basis of preparation, cont'd

The base case economic forecasts for Australia embody a pickup in growth reflecting lower interest rates, a pickup in real household disposable income and a normalising international environment. In New Zealand, economic recovery and a return to growth is forecast, and house prices are expected to increase following a period of stabilisation.

Probability weightings

Probability weightings for each scenario are determined by management considering the risks and uncertainties surrounding the base case economic scenario including the uncertainties described above.

The average weightings have remained unchanged from the September 2024 half with an average base weighting of 46% (Sep 24: 46%; Mar 24: 46%), an average upside weighting of 1% (Sep 24: 1%; Mar 24: 0%), an average downside weighting of 40% (Sep 24: 40%; Mar 24: 41%), and an average severe downside rating of 13% (Sep 24: 13%; Mar 24: 13%).

The assigned probability weightings in Australia, New Zealand and Rest of World are subject to a high degree of inherent uncertainty and therefore the actual outcomes may be significantly different to those projected. The Group considers these weightings in each geography to provide estimates of the possible loss outcomes and taking into account short and long-term inter-relationships within the Group's credit portfolios.

Average weighting applied across the Group are summarised in the table below:

	Mar 25	Sep 24	Mar 24
Group			
Base	**46%**	46%	46%
Upside	**1%**	1%	0%
Downside	**40%**	40%	41%
Severe downside	**13%**	13%	13%

ECL - Sensitivity analysis

Given inherent economic uncertainties and the judgement applied to factors used in determining the expected default of borrowers in future periods, ECL reported by the Group should be considered as a best estimate within a range of possible estimates.

The table below illustrates the sensitivity of the Group's allowance for collectively assessed ECL to key factors used in determining it as at 31 March 2025:

	Balance Sheet $M	(Profit) and Loss Impact $M
If 1% of stage 1 facilities were included in stage 2	4,362	82
If 1% of stage 2 facilities were included in stage 1	4,274	(6)
100% upside scenario	1,580	(2,700)
100% base scenario	1,989	(2,291)
100% downside scenario	3,696	(584)
100% severe downside scenario	9,779	5,499

Provisions

The Group holds provisions for various obligations including restructuring costs, customer remediation, non-lending losses, fraud and forgeries and litigation related claims. These provisions involve judgements regarding the timing and outcome of future events, including estimates of expenditure required to satisfy such obligations. The appropriateness of the underlying assumptions for provisions is reviewed on a regular basis against actual experience and other relevant evidence, including expert legal advice, and adjustments are made to the provisions where appropriate.

2. Income

	Half Year			Movement	
	Mar 25 $M	Sep 24 $M	Mar 24 $M	Mar 25 v. Sep 24	Mar 25 v. Mar 24
Net interest income					
Interest income	**32,755**	30,846	29,832	6%	10%
Interest expense	**(23,697)**	(22,512)	(21,740)	5%	9%
Major bank levy	**(220)**	(197)	(192)	12%	15%
Net interest income	**8,838**	8,137	7,900	9%	12%
Other operating income					
Lending fees[1]	**215**	213	207	1%	4%
Non-lending fees	**1,121**	1,135	1,137	-1%	-1%
Commissions	**29**	38	37	-24%	-22%
Funds management income	**124**	116	125	7%	-1%
Fee and commission income	**1,489**	1,502	1,506	-1%	-1%
Fee and commission expense	**(596)**	(501)	(543)	19%	10%
Net fee and commission income	**893**	1,001	963	-11%	-7%
Net foreign exchange earnings and other financial instruments income[2]	**1,276**	1,054	1,112	21%	15%
Net income from insurance business	**46**	74	48	-38%	-4%
Share of associates' profit/(loss)	**54**	38	96	42%	-44%
Release of foreign currency translation reserve on dissolution of entities	**15**	2	20	large	-25%
Loss on disposal of investment in AmBank	**-**	-	(21)	n/a	large
Other	**31**	67	30	-54%	3%
Other income	**1,422**	1,235	1,285	15%	11%
Other operating income	**2,315**	2,236	2,248	4%	3%
Operating income	**11,153**	10,373	10,148	8%	10%

1. *Lending fees exclude fees treated as part of the effective yield calculation in interest income.*
2. *Includes fair value movements (excluding realised and accrued interest) on derivatives not designated as accounting hedges entered into to manage interest rate and foreign exchange risk, ineffective portions of cash flow hedges, and fair value movements in financial assets and liabilities measured and/or designated at fair value through profit or loss.*

3. Operating expenses

	Half Year			Movement	
	Mar 25 $M	Sep 24 $M	Mar 24 $M	Mar 25 v. Sep 24	Mar 25 v. Mar 24
i) Personnel					
Salaries and related costs	**2,930**	2,747	2,728	7%	7%
Superannuation costs	**246**	226	217	9%	13%
Equity-settled share-based payments	**60**	66	73	-9%	-18%
Other	**56**	59	24	-5%	large
Personnel	**3,292**	3,098	3,042	6%	8%
ii) Premises					
Rent	**48**	37	37	30%	30%
Depreciation	**228**	219	217	4%	5%
Other	**85**	94	84	-10%	1%
Premises	**361**	350	338	3%	7%
iii) Technology					
Depreciation and amortisation	**233**	267	234	-13%	0%
Subscription licences and outsourced services	**633**	606	549	4%	15%
Other	**177**	135	103	31%	72%
Technology	**1,043**	1,008	886	3%	18%
iv) Restructuring	**83**	94	141	-12%	-41%
v) Other					
Advertising and public relations	**104**	113	87	-8%	20%
Professional fees	**400**	432	334	-7%	20%
Freight, stationery, postage and communication	**83**	92	78	-10%	6%
Card processing fees	**45**	54	53	-17%	-15%
Amortisation and impairment of other intangible assets[1]	**82**	7	-	large	n/a
Other	**295**	242	220	22%	34%
Other	**1,009**	940	772	7%	31%
Operating expenses	**5,788**	5,490	5,179	5%	12%

1. *Includes $82 million amortisation of acquired intangible assets recognised as part of the acquisition accounting relating to the Suncorp Bank acquisition during the March 2025 half (Sep 24 half: nil; Mar 24 half: nil).*

4. Income tax expense

Reconciliation of the prima facie income tax expense on pre-tax profit with the income tax expense recognised in the profit and loss.

	Half Year			Movement	
	Mar 25 $M	**Sep 24 $M**	**Mar 24 $M**	**Mar 25 v. Sep 24**	**Mar 25 v. Mar 24**
Profit before income tax	**5,222**	4,547	4,899	15%	7%
Prima facie income tax expense at 30%	**1,567**	1,364	1,470	15%	7%
Tax effect of permanent differences:					
Share of associates' (profit)/loss	**(16)**	(12)	(29)	33%	-45%
Interest on convertible instruments	**58**	60	64	-3%	-9%
Overseas tax rate differential	**(83)**	(70)	(86)	19%	-3%
Provision for foreign tax on dividend repatriation	**11**	15	21	-27%	-48%
Other	**(2)**	13	(14)	large	-86%
Subtotal	**1,535**	1,370	1,426	12%	8%
Income tax (over)/under provided in previous years	**3**	11	9	-73%	-67%
Income tax expense	**1,538**	1,381	1,435	11%	7%
Australia	**774**	728	753	6%	3%
Overseas	**764**	653	682	17%	12%
Income tax expense	**1,538**	1,381	1,435	11%	7%
Effective tax rate	**29.5%**	30.4%	29.3%		

5. Dividends

	Half Year			Movement	
	Mar 25	Sep 24	Mar 24	Mar 25 v. Sep 24	Mar 25 v. Mar 24
Ordinary share dividend ($M)[1]					
Interim dividend	**-**	2,496	-		
Final dividend	**2,472**	-	2,771		
Total	**2,472**	2,496	2,771	-1%	-11%

1. *Excludes dividends paid by subsidiaries to the Group's non-controlling equity holders of $20 million (Sep 24 half: $19 million; Mar 24 half: $13 million).*

Ordinary Shares

ANZBGL paid a 2024 final dividend of $2,472 million to its intermediate holding company, ANZ BH Pty Ltd, a wholly owned subsidiary of ANZGHL, during the March 2025 half.

The Directors proposed a 2025 interim dividend of approximately $2,170 million to be paid on 1 July 2025 to ANZ BH Pty Ltd, with the final amount subject to the outcomes of the ANZGHL Dividend Reinvestment Plan and Bonus Option Plan.

6. Segment reporting

i) Description of segments

The Group operates on a divisional structure with seven divisions: Australia Retail, Australia Commercial, Institutional, New Zealand, Suncorp Bank, Pacific, and Group Centre.

Operating segments presented below are consistent with internal divisional reporting provided to the chief operating decision maker, being the Chief Executive Officer.

Australia Retail

The Australia Retail division provides a full range of banking services to Australian consumers. This includes Home Loans, Deposits, Credit Cards and Personal Loans. Products and services are provided via the branch network, home loan specialists, contact centres, a variety of self-service channels (digital and internet banking, website, ATMs and phone banking) and third-party brokers.

Australia Commercial

The Australia Commercial division provides a full range of banking products and financial services across the following customer segments: SME Banking (small business owners and medium commercial customers), and Diversified & Specialist Businesses (large commercial customers, and high net worth individuals and family groups). It also includes run-off businesses (Central Functions).

Institutional

The Institutional division services institutional and corporate customers, and governments across Australia, New Zealand and International (including Papua New Guinea (PNG)) via the following business units:

- Transaction Banking provides customers with working capital and liquidity solutions including documentary trade, supply chain financing, commodity financing as well as cash management solutions, deposits, payments and clearing.
- Corporate Finance provides customers with loan products, loan syndication, specialised loan structuring and execution, project and export finance, debt structuring and acquisition finance, and sustainable finance solutions.
- Markets provides customers with risk management services in foreign exchange, interest rates, credit, commodities and debt capital markets in addition to managing the Group's interest rate exposure and liquidity position.
- Central Functions consists of enablement functions that help deliver payments services and operational support across both the Institutional division and the wider enterprise.

New Zealand

The New Zealand division comprises the following business units:

- Personal provides a full range of banking and wealth management services to consumer and private banking customers. We deliver our services via our internet and app-based digital solutions and a network of branches, mortgage specialists, private bankers and contact centres.
- Business & Agri provides a full range of banking services through our digital, branch and contact centre channels, and traditional relationship banking and sophisticated financial solutions through dedicated managers. These cover privately owned small, medium and large enterprises, the agricultural business segment, government and government-related entities.
- Central Functions includes treasury and back-office support functions.

Suncorp Bank

The Suncorp Bank division provides banking and related services to retail, commercial, small and medium enterprises and agribusiness customers in Australia.

Pacific

The Pacific division provides products and services to retail and commercial customers (including multi-nationals) and to governments located in the Pacific region, excluding PNG which forms part of the Institutional division.

Group Centre

Group Centre division provides support to the operating divisions, including technology, property, risk management, financial management, treasury, strategy, marketing, human resources, corporate affairs, and shareholder functions. It also includes minority investments in Asia.

ii) Operating segments

The Group measures the performance of operating segments on a cash profit basis. To calculate cash profit, the Group excludes items from profit after tax attributable to shareholders. The adjustments relate to the impacts of economic hedges and revenue and expense hedges, which represent timing differences that will reverse through earnings in the future, and the amortisation of intangible assets recognised as a result of the Suncorp Bank acquisition.

Transactions between divisions across segments within the Group are conducted on an arm's length basis and where relevant disclosed as part of the income and expenses of these segments.

March 2025 Half Year	Australia Retail $M	Australia Commercial $M	Institutional $M	New Zealand $M	Suncorp Bank $M	Pacific $M	Group Centre $M	Group Total $M
Net interest income	2,592	1,589	2,033	1,589	823	55	157	8,838
Net fee and commission income	215	138	333	193	21	7	(14)	893
Other income[1,2]	54	15	1,053	-	9	37	70	1,238
Operating income[1,2]	2,861	1,742	3,419	1,782	853	99	213	10,969
Operating expenses[3]	(1,781)	(755)	(1,461)	(685)	(433)	(74)	(517)	(5,706)
Cash profit before credit impairment and income tax	1,080	987	1,958	1,097	420	25	(304)	5,263
Credit impairment (charge)/release	(63)	(50)	(28)	4	(11)	3	2	(143)
Cash profit before income tax	1,017	937	1,930	1,101	409	28	(302)	5,120
Income tax (expense)/benefit[1,2,3]	(312)	(282)	(550)	(309)	(123)	(7)	73	(1,510)
Non-controlling interests	-	-	-	-	-	(1)	(20)	(21)
Cash profit/(loss)	705	655	1,380	792	286	20	(249)	3,589
Economic hedges[1]								167
Revenue and expense hedges[2]								(36)
Amortisation of acquired intangibles[3]								(57)
Profit after tax attributable to shareholders								3,663
Financial Position								
Total external assets	343,706	66,327	618,958	127,467	88,785	3,365	54,363	1,302,971
Total external liabilities	187,342	124,811	493,342	122,408	82,483	3,848	218,025	1,232,259

1. *The economic hedges cash profit adjustment relates to the Institutional, New Zealand, Suncorp Bank and Group Centre divisions. In the condensed consolidated income statement, $236 million gain was recognised in Other operating income for the March 2025 half (Sep 24 half: $91 million loss; Mar 24 half: $277 million loss) and $69 million of Income tax expense was recognised for the March 2025 half (Sep 24 half: $24 million benefit; Mar 24 half: $80 million benefit).*

2. *The revenue and expense hedges cash profit adjustment relates to the Group Centre division. In the condensed consolidated income statement, $52 million loss was recognised in Other operating income for the March 2025 half (Sep 24 half: $31 million gain; Mar 24 half: $75 million gain) and $16 million of Income benefit was recognised for the March 2025 half (Sep 24 half: $9 million expense; Mar 24 half: $23 million expense).*

3. *The amortisation of acquired intangible assets cash profit adjustment relates to the Suncorp Bank division. In the condensed consolidated income statement, $82 million was recognised in Operating expenses for the March 2025 half (Sep 24 half: nil; Mar 24 half: nil) and $25 million of Income tax benefit was recognised for the March 2025 half (Sep 24 half: nil; Mar 24 half: nil).*

6. Segment reporting, cont'd

September 2024 Half Year	Australia Retail $M	Australia Commercial $M	Institutional $M	New Zealand $M	Suncorp Bank $M	Pacific $M	Group Centre $M	Group Total $M
Net interest income	2,615	1,584	1,859	1,571	251	60	197	**8,137**
Net fee and commission income	284	154	372	192	6	6	(13)	**1,001**
Other income[1,2]	79	19	1,089	(1)	-	41	68	**1,295**
Operating income[1,2]	2,978	1,757	3,320	1,762	257	107	252	**10,433**
Operating expenses	(1,781)	(744)	(1,431)	(699)	(188)	(68)	(579)	**(5,490)**
Cash profit before credit impairment and income tax	1,197	1,013	1,889	1,063	69	39	(327)	**4,943**
Credit impairment (charge)/release	(28)	(45)	4	(24)	(243)	2	(2)	**(336)**
Cash profit before income tax	1,169	968	1,893	1,039	(174)	41	(329)	**4,607**
Income tax (expense)/benefit[1,2]	(356)	(291)	(557)	(294)	52	(11)	61	**(1,396)**
Non-controlling interests	-	-	-	-	-	(1)	(20)	**(21)**
Cash profit/(loss)	813	677	1,336	745	(122)	29	(288)	**3,190**
Economic hedges[1]								**(67)**
Revenue and expense hedges[2]								**22**
Amortisation of acquired intangibles								**-**
Profit after tax attributable to shareholders								**3,145**
Financial Position								
Total external assets	335,356	65,456	574,998	127,032	87,185	3,162	36,396	**1,229,585**
Total external liabilities	180,801	122,029	460,053	120,203	81,610	3,686	192,443	**1,160,825**

March 2024 Half Year	Australia Retail $M	Australia Commercial $M	Institutional $M	New Zealand $M	Suncorp Bank $M	Pacific $M	Group Centre $M	Group Total $M
Net interest income	2,608	1,580	1,882	1,572	-	63	195	**7,900**
Net fee and commission income	247	146	368	207	-	8	(13)	**963**
Other income[1,2]	54	23	1,319	1	-	36	54	**1,487**
Operating income[1,2]	2,909	1,749	3,569	1,780	-	107	236	**10,350**
Operating expenses	(1,735)	(763)	(1,444)	(677)	-	(70)	(490)	**(5,179)**
Cash profit before credit impairment and income tax	1,174	986	2,125	1,103	-	37	(254)	**5,171**
Credit impairment (charge)/release	(43)	(35)	6	(4)	-	6	-	**(70)**
Cash profit before income tax	1,131	951	2,131	1,099	-	43	(254)	**5,101**
Income tax (expense)/benefit[1,2]	(337)	(286)	(609)	(308)	-	(11)	59	**(1,492)**
Non-controlling interests	-	-	-	-	-	(1)	(13)	**(14)**
Cash profit/(loss)	794	665	1,522	791	-	31	(208)	**3,595**
Economic hedges[1]								**(197)**
Revenue and expense hedges[2]								**52**
Amortisation of acquired intangibles								**-**
Profit after tax attributable to shareholders								**3,450**
Financial Position								
Total external assets	325,775	64,279	513,026	124,986	-	3,195	58,877	**1,090,138**
Total external liabilities	176,484	122,386	407,444	122,310	-	3,791	187,521	**1,019,936**

1. *The economic hedges cash profit adjustment relates to the Institutional, New Zealand, Suncorp Bank and Group Centre divisions. In the condensed consolidated income statement, $236 million gain was recognised in Other operating income for the March 2025 half (Sep 24 half: $91 million loss; Mar 24 half: $277 million loss) and $69 million of Income tax expense was recognised for the March 2025 half (Sep 24 half: $24 million benefit; Mar 24 half: $80 million benefit).*
2. *The revenue and expense hedges cash profit adjustment relates to the Group Centre division. In the condensed consolidated income statement, $52 million loss was recognised in Other operating income for the March 2025 half (Sep 24 half: $31 million gain; Mar 24 half: $75 million gain) and $16 million of Income tax benefit was recognised for the March 2025 half (Sep 24 half: $9 million expense; Mar 24 half: $23 million expense).*

7. Net loans and advances

	As at			Movement	
	Mar 25 $M	Sep 24 $M	Mar 24 $M	Mar 25 v. Sep 24	Mar 25 v. Mar 24
Australia					
Overdrafts	**4,479**	4,685	4,031	-4%	11%
Credit cards outstanding	**5,211**	5,565	5,607	-6%	-7%
Commercial bills outstanding	**4,072**	4,401	4,557	-7%	-11%
Term loans - housing	**391,719**	382,030	314,103	3%	25%
Term loans - non-housing	**193,921**	191,266	173,764	1%	12%
Other	**916**	919	927	0%	-1%
Total Australia	**600,318**	588,866	502,989	2%	19%
New Zealand					
Overdrafts	**1,011**	1,003	850	1%	19%
Credit cards outstanding	**1,126**	1,142	1,163	-1%	-3%
Term loans - housing	**103,090**	102,099	100,407	1%	3%
Term loans - non-housing	**34,852**	35,613	36,487	-2%	-4%
Total New Zealand	**140,079**	139,857	138,907	0%	1%
Rest of World					
Overdrafts	**585**	421	530	39%	10%
Credit cards outstanding	**6**	6	6	0%	0%
Term loans - housing	**454**	425	431	7%	5%
Term loans - non-housing	**79,420**	74,405	73,184	7%	9%
Other	**-**	5	115	large	large
Total Rest of World	**80,465**	75,262	74,266	7%	8%
Subtotal	**820,862**	803,985	716,162	2%	15%
Unearned income[1]	**(584)**	(515)	(494)	13%	18%
Capitalised brokerage and other origination costs[1]	**4,335**	4,237	3,642	2%	19%
Gross loans and advances	**824,613**	807,707	719,310	2%	15%
Allowance for ECL (refer to Note 8)	**(3,761)**	(3,675)	(3,489)	2%	8%
Net loans and advances	**820,852**	804,032	715,821	2%	15%

1. *Amortised over the expected life of the loan.*

8. Allowance for expected credit losses

The Group's assessment of expected credit losses (ECL) from its credit portfolio is subject to judgements and estimates made by management based on a variety of internal and external information, as well as the Group's experience of the performance of the portfolio under a variety of conditions.

	As at								
	Mar 25			Sep 24			Mar 24		
	Collectively assessed $M	Individually assessed $M	Total $M	Collectively assessed $M	Individually assessed $M	Total $M	Collectively assessed $M	Individually assessed $M	Total $M
Net loans and advances at amortised cost	**3,415**	**346**	**3,761**	3,372	303	3,675	3,169	320	3,489
Off-balance sheet commitments - undrawn and contingent facilities	**834**	**18**	**852**	841	5	846	844	5	849
Investment securities - debt securities at amortised cost	**31**	**-**	**31**	34	-	34	33	-	33
Total	**4,280**	**364**	**4,644**	4,247	308	4,555	4,046	325	4,371
Other Comprehensive Income									
Investment securities - debt securities at FVOCI[1]	**21**	**-**	**21**	20	-	20	17	-	17

1. For FVOCI assets, the allowance for ECL does not alter the carrying amount which remains at fair value. Instead, the allowance for ECL is recognised in Other comprehensive income with a corresponding charge to profit or loss.

The following tables present the movement in the allowance for ECL.

Net loans and advances at amortised cost

Allowance for ECL is included in Net loans and advances.

			Stage 3		
	Stage 1 $M	Stage 2 $M	Collectively assessed $M	Individually assessed $M	Total $M
As at 1 October 2023	**1,227**	**1,624**	**329**	**366**	**3,546**
Transfer between stages	129	(144)	(49)	64	-
New and increased provisions (net of releases)	(119)	64	120	137	202
Write-backs	-	-	-	(80)	(80)
Bad debts written-off (excluding recoveries)	-	-	-	(146)	(146)
Foreign currency translation and other movements[1]	(5)	(6)	(1)	(21)	(33)
As at 31 March 2024	**1,232**	**1,538**	**399**	**320**	**3,489**
Transfer between stages	140	(156)	(54)	70	-
New and increased provisions (net of releases)[2]	(84)	273	94	191	474
Write-backs	-	-	-	(97)	(97)
Bad debts written-off (excluding recoveries)	-	-	-	(170)	(170)
Foreign currency translation and other movements[1]	(12)	(2)	4	(11)	(21)
As at 30 September 2024	**1,276**	**1,653**	**443**	**303**	**3,675**
Transfer between stages	147	(160)	(61)	74	-
New and increased provisions (net of releases)	(214)	198	109	210	303
Write-backs	-	-	-	(67)	(67)
Bad debts written-off (excluding recoveries)	-	-	-	(172)	(172)
Foreign currency translation and other movements[1]	17	(1)	8	(2)	22
As at 31 March 2025	**1,226**	**1,690**	**499**	**346**	**3,761**

1. Other movements include the impact of discounting on expected cash flows for individually assessed allowances for ECL and the impact of divestments completed during the period.

2. Includes Suncorp Bank acquisition related collectively assessed allowance for ECL. Under accounting standards, these were initially recognised as Stage 1, and where relevant moving to Stage 2 after the date of acquisition, all presented within New and increased provisions (net of releases).

8. Allowance for expected credit losses, cont'd

Off-balance sheet commitments - undrawn and contingent facilities

Allowance for ECL is included in Other provisions.

	Stage 1 $M	Stage 2 $M	Stage 3 Collectively assessed $M	Stage 3 Individually assessed $M	Total $M
As at 1 October 2023	**630**	**162**	**25**	**10**	**827**
Transfer between stages	18	(16)	(2)	-	-
New and increased provisions (net of releases)	7	22	1	-	30
Write-backs	-	-	-	(5)	(5)
Foreign currency translation	(2)	(1)	-	-	(3)
As at 31 March 2024	**653**	**167**	**24**	**5**	**849**
Transfer between stages	16	(15)	(1)	-	-
New and increased provisions (net of releases)	3	5	2	3	13
Write-backs	-	-	-	(2)	(2)
Foreign currency translation and other movements[1]	(14)	(1)	2	(1)	(14)
As at 30 September 2024	**658**	**156**	**27**	**5**	**846**
Transfer between stages	19	(18)	(2)	1	-
New and increased provisions (net of releases)	(60)	26	6	14	(14)
Write-backs	-	-	-	(2)	(2)
Foreign currency translation	23	-	(1)	-	22
As at 31 March 2025	**640**	**164**	**30**	**18**	**852**

1. *Other movements include the impact of divestments completed during the period.*

Investment securities - debt securities at amortised cost

Allowance for ECL is included in Investment securities.

	Stage 1 $M	Stage 2 $M	Stage 3 Collectively assessed $M	Stage 3 Individually assessed $M	Total $M
As at 31 March 2024	33	-	-	-	33
As at 30 September 2024	34	-	-	-	34
As at 31 March 2025	**31**	**-**	**-**	**-**	**31**

Investment securities - debt securities at FVOCI

For FVOCI assets, the allowance for ECL does not alter the carrying amount which remains at fair value. Instead, the allowance for ECL is recognised in Other comprehensive income with a corresponding charge to profit or loss.

	Stage 1 $M	Stage 2 $M	Stage 3 Collectively assessed $M	Stage 3 Individually assessed $M	Total $M
As at 31 March 2024	17	-	-	-	17
As at 30 September 2024	20	-	-	-	20
As at 31 March 2025	**21**	**-**	**-**	**-**	**21**

8. Allowance for expected credit losses, cont'd

Credit impairment charge/(release) analysis

	Half Year			Movement	
	Mar 25 $M	Sep 24 $M	Mar 24 $M	Mar 25 v. Sep 24	Mar 25 v. Mar 24
New and increased provisions (net of releases)[1,2]					
- Collectively assessed[3]	**(14)**	230	32	large	large
- Individually assessed	**299**	264	201	13%	49%
Write-backs[4]	**(69)**	(99)	(85)	-30%	-19%
Recoveries of amounts previously written-off	**(73)**	(59)	(78)	24%	-6%
Total credit impairment charge/(release)	**143**	336	70	-57%	large

1. *Includes the impact of transfers between collectively assessed and individually assessed.*
2. *New and increased provisions (net of releases) includes:*

	Mar 25 half		*Sep 24 half*		*Mar 24 half*	
	Collectively assessed $M	*Individually assessed $M*	*Collectively assessed $M*	*Individually assessed $M*	*Collectively assessed $M*	*Individually assessed $M*
Net loans and advances at amortised cost	*19*	*284*	*213*	*261*	*1*	***201***
Off-balance sheet commitments	*(29)*	*15*	*10*	*3*	*30*	**-**
Investment securities - debt securities at amortised cost	*(5)*	*-*	*4*	*-*	*(1)*	**-**
Investment securities - debt securities at FVOCI	*1*	*-*	*3*	*-*	*2*	**-**
Total	***(14)***	***299***	***230***	***264***	***32***	***201***

3. *Includes Suncorp Bank acquisition related collectively assessed credit impairment charge of $244 million for the September 2024 half.*
4. *Consists of write-backs in Net loans and advances at amortised cost of $67 million for the March 2025 half (Sep 24 half: $97 million; Mar 24 half: $80 million), and Off-balance sheet commitment of $2 million for the March 2025 half (Sep 24 half: $2 million; Mar 24 half: $5 million).*

9. Deposits and other borrowings

	As at			Movement	
	Mar 25 $M	Sep 24 $M	Mar 24 $M	Mar 25 v. Sep 24	Mar 25 v. Mar 24
Australia					
Certificates of deposit	**30,215**	34,011	30,572	-11%	-1%
Term deposits	**102,183**	102,413	86,857	0%	18%
On demand and short-term deposits	**322,209**	309,553	283,400	4%	14%
Deposits not bearing interest	**39,770**	39,964	19,955	0%	99%
Deposits from banks and securities sold under repurchase agreements	**55,917**	44,953	38,425	24%	46%
Commercial paper and other borrowings	**60,203**	46,472	42,267	30%	42%
Total Australia	**610,497**	577,366	501,476	6%	22%
New Zealand					
Certificates of deposit	**1,213**	1,079	1,800	12%	-33%
Term deposits	**54,438**	54,500	52,762	0%	3%
On demand and short-term deposits	**58,246**	56,038	55,569	4%	5%
Deposits not bearing interest	**15,405**	14,586	15,825	6%	-3%
Deposits from banks and securities sold under repurchase agreements	**3,182**	3,207	3,912	-1%	-19%
Commercial paper and other borrowings	**1,931**	1,304	3,152	48%	-39%
Total New Zealand	**134,415**	130,714	133,020	3%	1%
Rest of World					
Certificates of deposit	**8,153**	7,116	6,723	15%	21%
Term deposits	**141,641**	116,603	100,919	21%	40%
On demand and short-term deposits	**18,136**	17,423	20,569	4%	-12%
Deposits not bearing interest	**5,770**	5,554	5,479	4%	5%
Deposits from banks and securities sold under repurchase agreements	**55,018**	50,390	39,003	9%	41%
Total Rest of World	**228,718**	197,086	172,693	16%	32%
Deposits and other borrowings[1]	**973,630**	905,166	807,189	8%	21%

1. *Customer deposits balance of $757,798 million at 31 March 2025 (Sep 24: $716,634 million; Mar 24: $641,335 million) includes Term deposits, On demand and short-term deposits and Deposits not bearing interest.*

10. Debt issuances

	As at			Movement	
	Mar 25 $M	Sep 24 $M	Mar 24 $M	Mar 25 v. Sep 24	Mar 25 v. Mar 24
Total unsubordinated debt	**126,679**	116,723	90,763	9%	40%
Additional Tier 1 Capital (perpetual subordinated securities)[1]					
ANZ Capital Notes (ANZ CN)[2]					
ANZ CN5[3]	**-**	931	930	large	large
ANZ CN6	**1,491**	1,490	1,490	0%	0%
ANZ CN7	**1,300**	1,300	1,299	0%	0%
ANZ CN8	**1,486**	1,485	1,484	0%	0%
ANZ CN9	**1,682**	1,680	1,678	0%	0%
ANZ Capital Securities[4]	**1,544**	1,391	1,434	11%	8%
Tier 2 Capital - Term Subordinated Notes[5]	**32,444**	28,584	26,754	14%	21%
Other subordinated debt securities	**2,929**	2,804	1,277	4%	large
Total subordinated debt	**42,876**	39,665	36,346	8%	18%
Total debt issuances	**169,555**	156,388	127,109	8%	33%

1. *ANZ Capital Notes and ANZ Capital Securities are Basel 3 compliant instruments.*
2. *Each of the ANZ Capital Notes will convert into a variable number of ordinary shares of ANZGHL on a specified mandatory conversion date at a 1% discount (subject to certain conditions being satisfied). If ANZBGL's Common Equity Tier 1 capital ratio is equal to or less than 5.125%, or ANZBGL receives a notice of non-viability from APRA, then the notes will immediately convert into a variable number of ordinary shares of ANZGHL at a 1% discount subject to a maximum conversion number. Subject to certain conditions, the notes are redeemable or convertible into ordinary shares of ANZGHL (on similar terms to mandatory conversion) by ANZBGL at its discretion on an early redemption or conversion date.*

	Issuer	*Issue date*	*Issue amount $M*	*Early redemption or conversion date*	*Mandatory conversion date*
CN5	*ANZBGL*	*28 Sep 2017*	*931*	*20 Mar 2025*	*20 Mar 2027*
CN6	*ANZBGL*	*8 Jul 2021*	*1,500*	*20 Mar 2028*	*20 Sep 2030*
CN7	*ANZBGL*	*24 Mar 2022*	*1,310*	*20 Mar 2029*	*20 Sep 2031*
CN8	*ANZBGL*	*24 Mar 2023*	*1,500*	*20 Mar 2030*	*20 Sep 2032*
CN9	*ANZBGL*	*20 Mar 2024*	*1,700*	*20 Mar 2031*	*20 Sep 2033*

3. *ANZBGL fully redeemed ANZ CN5 on 20 March 2025. As a result, the mandatory conversion date for CN5 is no longer applicable.*
4. *On 15 June 2016, ANZBGL, acting through its London branch, issued USD 1 billion fully-paid perpetual subordinated contingent convertible securities (ANZ Capital Securities). If ANZBGL's Common Equity Tier 1 capital ratio is equal to or less than 5.125%, or ANZBGL receives a notice of non-viability from APRA, then the securities will immediately convert into a variable number of ANZGHL ordinary shares at a 1% discount subject to a maximum conversion number. Subject to certain conditions, on the First Reset Date (15 June 2026) and on each 5-year anniversary, ANZ has the right to redeem all of the securities at its discretion.*
5. *All the term subordinated notes are convertible and are Basel 3 compliant instruments. If ANZBGL receives a notice of non-viability from APRA, then the convertible subordinated notes will immediately convert into a variable number of ordinary shares of ANZGHL at a 1% discount subject to a maximum conversion number.*

11. Credit risk

Maximum exposure to credit risk

For financial assets recognised on the balance sheet, the maximum exposure to credit risk is the carrying amount. In certain circumstances there may be differences between the carrying amounts reported on the balance sheet and the amounts reported in the tables below. Principally, these differences arise in respect of financial assets that are subject to risks other than credit risk, such as equity instruments which are primarily subject to market risk, or bank notes and coins.

For undrawn facilities, this maximum exposure to credit risk is the full amount of the committed facilities. For contingent exposures, the maximum exposure to credit risk is the maximum amount the Group would have to pay if the instrument is called upon.

The table below shows the maximum exposure to credit risk of on-balance sheet, and off-balance sheet positions before taking account of any collateral held or other credit enhancements:

	Reported As at			Excluded[1] As at			Maximum Exposure to Credit Risk As at		
On-balance sheet positions	**Mar 25 $M**	**Sep 24 $M**	**Mar 24 $M**	**Mar 25 $M**	**Sep 24 $M**	**Mar 24 $M**	**Mar 25 $M**	**Sep 24 $M**	**Mar 24 $M**
Net loans and advances	**820,852**	804,032	715,821	**-**	-	-	**820,852**	804,032	715,821
Investment securities									
- debt securities at amortised cost	**6,917**	7,091	7,900	**-**	-	-	**6,917**	7,091	7,900
- debt securities at FVOCI	**146,773**	131,944	108,530	**-**	-	-	**146,773**	131,944	108,530
- equity securities at FVOCI	**1,208**	1,065	1,188	**1,208**	1,065	1,188	**-**	-	-
- debt securities at FVTPL	**174**	162	-	**-**	-	-	**174**	162	-
Other financial assets	**313,230**	271,876	244,928	**14,612**	13,079	8,640	**298,618**	258,797	236,288
Total on-balance sheet positions	**1,289,154**	1,216,170	1,078,367	**15,820**	14,144	9,828	**1,273,334**	1,202,026	1,068,539
Off-balance sheet commitments									
Undrawn and contingent facilities[2]	**319,672**	298,152	289,371	**-**	-	-	**319,672**	298,152	289,371
Total	**1,608,826**	1,514,322	1,367,738	**15,820**	14,144	9,828	**1,593,006**	1,500,178	1,357,910

1. *Excluded comprises bank notes and coins and cash at bank within Other financial assets, and Investment securities - equity securities at FVOCI as they do not have credit exposure.*
2. *Undrawn and contingent facilities include guarantees, letters of credit and performance related contingencies, net of collectively assessed allowance for expected credit losses.*

Credit Quality

The Group's internal Customer Credit Rating (CCR) is used to manage the credit quality of financial assets. To enable wider comparisons, the Group's CCRs are mapped to external rating agency scales as follows:

Credit Quality Description	Internal CCR	ANZ Customer Requirement	Moody's Rating	Standard & Poor's Rating
Strong	CCR 0+ to 4-	Demonstrated superior stability in their operating and financial performance over the long-term, and whose earnings capacity is not significantly vulnerable to foreseeable events.	Aaa - Baa3	AAA - BBB-
Satisfactory	CCR 5+ to 6-	Demonstrated sound operational and financial stability over the medium to long term even though some may be susceptible to cyclical trends or variability in earnings.	Ba1 - B1	BB+ - B+
Weak	CCR 7+ to 8=	Demonstrated some operational and financial instability, with variability and uncertainty in profitability and liquidity projected to continue over the short and possibly medium term.	B2 - Caa	B - CCC
Defaulted	CCR 8- to 10	When doubt arises as to the collectability of a credit facility, the financial instrument (or 'the facility') is classified as defaulted.	N/A	N/A

11. Credit risk, cont'd

Net loans and advances

			Stage 3		
As at March 2025	Stage 1 $M	Stage 2 $M	Collectively assessed $M	Individually assessed $M	Total $M
Strong	507,657	16,096	-	-	523,753
Satisfactory	189,086	44,293	-	-	233,379
Weak	15,709	18,219	-	-	33,928
Defaulted	-	-	6,802	993	7,795
Gross loans and advances at amortised cost	**712,452**	**78,608**	**6,802**	**993**	**798,855**
Allowance for ECL	(1,226)	(1,690)	(499)	(346)	(3,761)
Net loans and advances at amortised cost	**711,226**	**76,918**	**6,303**	**647**	**795,094**
Coverage ratio	**0.17%**	**2.15%**	**7.34%**	**34.84%**	**0.47%**
Loans and advances at fair value through profit or loss					21,568
Loans and advances purchased credit impaired[1]					439
Unearned income					(584)
Capitalised brokerage and other origination costs					4,335
Net carrying amount					**820,852**
As at September 2024					
Strong	485,243	17,072	-	-	502,315
Satisfactory	188,825	46,940	-	-	235,765
Weak	15,538	18,222	-	-	33,760
Defaulted	-	-	5,976	832	6,808
Gross loans and advances at amortised cost	**689,606**	**82,234**	**5,976**	**832**	**778,648**
Allowance for ECL	(1,276)	(1,653)	(443)	(303)	(3,675)
Net loans and advances at amortised cost	**688,330**	**80,581**	**5,533**	**529**	**774,973**
Coverage ratio	**0.19%**	**2.01%**	**7.41%**	**36.42%**	**0.47%**
Loans and advances at fair value through profit or loss					24,786
Loans and advances purchased credit impaired[1]					551
Unearned income					(515)
Capitalised brokerage and other origination costs					4,237
Net carrying amount					**804,032**
As at March 2024					
Strong	405,604	16,931	-	-	422,535
Satisfactory	199,316	39,766	-	-	239,082
Weak	12,541	12,086	-	-	24,627
Defaulted	-	-	5,011	880	5,891
Gross loans and advances at amortised cost	**617,461**	**68,783**	**5,011**	**880**	**692,135**
Allowance for ECL	(1,232)	(1,538)	(399)	(320)	(3,489)
Net loans and advances at amortised cost	**616,229**	**67,245**	**4,612**	**560**	**688,646**
Coverage ratio	**0.20%**	**2.24%**	**7.96%**	**36.36%**	**0.50%**
Loans and advances at fair value through profit or loss					24,027
Unearned income					(494)
Capitalised brokerage and other origination costs					3,642
Net carrying amount					**715,821**

1. *Represents Stage 3 exposures from Suncorp Bank at the date of acquisition recognised net of allowance for ECL.*

11. Credit risk, cont'd

Off-balance sheet commitments - undrawn and contingent facilities

			Stage 3		
As at March 2025	**Stage 1 $M**	**Stage 2 $M**	**Collectively assessed $M**	**Individually assessed $M**	**Total $M**
Strong	217,514	1,189	-	-	218,703
Satisfactory	28,039	3,048	-	-	31,087
Weak	719	1,316	-	-	2,035
Defaulted	-	-	149	80	229
Gross undrawn and contingent facilities subject to ECL	**246,272**	**5,553**	**149**	**80**	**252,054**
Allowance for ECL included in Other provisions	(640)	(164)	(30)	(18)	(852)
Net undrawn and contingent facilities subject to ECL	**245,632**	**5,389**	**119**	**62**	**251,202**
Coverage ratio	**0.26%**	**2.95%**	**20.13%**	**22.50%**	**0.34%**
Undrawn and contingent facilities not subject to ECL[1]					68,470
Net undrawn and contingent facilities					**319,672**
As at September 2024					
Strong	200,720	1,497	-	-	202,217
Satisfactory	26,496	3,249	-	-	29,745
Weak	880	931	-	-	1,811
Defaulted	-	-	101	26	127
Gross undrawn and contingent facilities subject to ECL	**228,096**	**5,677**	**101**	**26**	**233,900**
Allowance for ECL included in Other provisions	(658)	(156)	(27)	(5)	(846)
Net undrawn and contingent facilities subject to ECL	**227,438**	**5,521**	**74**	**21**	**233,054**
Coverage ratio	**0.29%**	**2.75%**	**26.73%**	**19.23%**	**0.36%**
Undrawn and contingent facilities not subject to ECL[1]					65,098
Net undrawn and contingent facilities					**298,152**
As at March 2024					
Strong	193,490	1,204	-	-	194,694
Satisfactory	23,826	3,648	-	-	27,474
Weak	984	719	-	-	1,703
Defaulted	-	-	73	49	122
Gross undrawn and contingent facilities subject to ECL	**218,300**	**5,571**	**73**	**49**	**223,993**
Allowance for ECL included in Other provisions	(653)	(167)	(24)	(5)	(849)
Net undrawn and contingent facilities subject to ECL	**217,647**	**5,404**	**49**	**44**	**223,144**
Coverage ratio	**0.30%**	**3.00%**	**32.88%**	**10.20%**	**0.38%**
Undrawn and contingent facilities not subject to ECL[1]					66,227
Net undrawn and contingent facilities					**289,371**

[1] *Commitments that can be unconditionally cancelled at any time without notice.*

11. Credit risk, cont'd

Investment securities - debt securities at amortised cost

As at March 2025	Stage 1 $M	Stage 2 $M	Stage 3 Collectively assessed $M	Stage 3 Individually assessed $M	Total $M
Strong	5,159	-	-	-	5,159
Satisfactory	147	-	-	-	147
Weak	1,642	-	-	-	1,642
Gross investment securities - debt securities at amortised cost	**6,948**	**-**	**-**	**-**	**6,948**
Allowance for ECL	(31)	-	-	-	(31)
Net investment securities - debt securities at amortised cost	**6,917**	**-**	**-**	**-**	**6,917**
Coverage ratio	**0.45%**	**-**	**-**	**-**	**0.45%**
As at September 2024					
Strong	5,535	-	-	-	5,535
Satisfactory	72	-	-	-	72
Weak	1,518	-	-	-	1,518
Gross investment securities - debt securities at amortised cost	**7,125**	**-**	**-**	**-**	**7,125**
Allowance for ECL	(34)	-	-	-	(34)
Net investment securities - debt securities at amortised cost	**7,091**	-	-	-	**7,091**
Coverage ratio	**0.48%**	-	-	-	**0.48%**
As at March 2024					
Strong	6,018	-	-	-	6,018
Satisfactory	137	-	-	-	137
Weak	1,778	-	-	-	1,778
Gross investment securities - debt securities at amortised cost	**7,933**	**-**	-	-	**7,933**
Allowance for ECL	(33)	-	-	-	(33)
Net investment securities - debt securities at amortised cost	**7,900**	-	-	-	**7,900**
Coverage ratio	**0.42%**	-	-	-	**0.42%**

Investment securities - debt securities at FVOCI

As at March 2025	Stage 1 $M	Stage 2 $M	Stage 3 Collectively assessed $M	Stage 3 Individually assessed $M	Total $M
Strong	146,773	-	-	-	146,773
Investment securities - debt securities at FVOCI	**146,773**	**-**	**-**	**-**	**146,773**
Allowance for ECL recognised in Other comprehensive income	(21)	-	-	-	(21)
Coverage ratio	**0.01%**	**-**	**-**	**-**	**0.01%**
As at September 2024					
Strong	131,944	-	-	-	131,944
Investment securities - debt securities at FVOCI	**131,944**	**-**	**-**	**-**	**131,944**
Allowance for ECL recognised in Other comprehensive income	(20)	-	-	-	(20)
Coverage ratio	**0.02%**	**-**	**-**	**-**	**0.02%**
As at March 2024					
Strong	108,530	-	-	-	108,530
Investment securities - debt securities at FVOCI	**108,530**	**-**	**-**	**-**	**108,530**
Allowance for ECL recognised in Other comprehensive income	(17)	-	-	-	(17)
Coverage ratio	**0.02%**	**-**	**-**	**-**	**0.02%**

11. Credit risk, cont'd

Other financial assets

	As at		
	Mar 25 $M	**Sep 24 $M**	**Mar 24 $M**
Strong	**280,729**	250,471	230,915
Satisfactory[1]	**17,409**	7,954	4,533
Weak	**654**	534	840
Other financial assets[1]	**298,792**	258,959	236,288

1. *Includes Investment securities - debt securities at FVTPL of $174 million (Sep 24: $162 million; Mar 24: nil).*

12. Fair value of financial assets and financial liabilities

Classification of Financial Assets and Financial Liabilities

The Group recognises and measures financial instruments at either fair value or amortised cost, with a significant number of financial instruments on the balance sheet at fair value.

Fair value is the best estimate of the price that would be received to sell an asset, or paid to transfer a liability, in an orderly transaction between market participants at the measurement date.

The following tables set out the classification of financial assets and liabilities according to their measurement bases with their carrying amounts as recognised on the balance sheet.

As at March 2025	At amortised cost $M	At fair value $M	Total $M
Financial assets			
Cash and cash equivalents	**140,504**	**55,284**	**195,788**
Settlement balances owed to ANZ	**6,225**	**-**	**6,225**
Collateral paid	**10,464**	**-**	**10,464**
Trading assets	**-**	**45,745**	**45,745**
Derivative financial instruments	**-**	**49,552**	**49,552**
Investment securities	**6,917**	**148,155**	**155,072**
Net loans and advances	**799,284**	**21,568**	**820,852**
Regulatory deposits	**644**	**-**	**644**
Other financial assets	**4,812**	**-**	**4,812**
Total	**968,850**	**320,304**	**1,289,154**
Financial liabilities			
Settlement balances owed by ANZ	**16,085**	**-**	**16,085**
Collateral received	**10,129**	**-**	**10,129**
Deposits and other borrowings	**918,177**	**55,453**	**973,630**
Derivative financial instruments	**-**	**44,279**	**44,279**
Payables and other liabilities	**11,642**	**4,084**	**15,726**
Debt issuances	**167,313**	**2,242**	**169,555**
Total	**1,123,346**	**106,058**	**1,229,404**
As at September 2024			
Financial assets			
Cash and cash equivalents	113,710	37,255	150,965
Settlement balances owed to ANZ	5,484	-	5,484
Collateral paid	10,090	-	10,090
Trading assets	-	45,755	45,755
Derivative financial instruments	-	54,370	54,370
Investment securities	7,091	133,171	140,262
Net loans and advances	779,246	24,786	804,032
Regulatory deposits	665	-	665
Other financial assets	4,547	-	4,547
Total	920,833	295,337	1,216,170
Financial liabilities			
Settlement balances owed by ANZ	16,188	-	16,188
Collateral received	6,583	-	6,583
Deposits and other borrowings	862,165	43,001	905,166
Derivative financial instruments	-	55,254	55,254
Payables and other liabilities	12,571	6,023	18,594
Debt issuances	154,572	1,816	156,388
Total	1,052,079	106,094	1,158,173

12. Fair value of financial assets and financial liabilities, cont'd

As at March 2024	At amortised cost $M	At fair value $M	Total $M
Financial assets			
Cash and cash equivalents	114,632	23,064	137,696
Settlement balances owed to ANZ	3,809	-	3,809
Collateral paid	8,241	-	8,241
Trading assets	-	42,442	42,442
Derivative financial instruments	-	47,481	47,481
Investment securities	7,900	109,718	117,618
Net loans and advances	691,794	24,027	715,821
Regulatory deposits	696	-	696
Other financial assets	4,563	-	4,563
Total	831,635	246,732	1,078,367
Financial liabilities			
Settlement balances owed by ANZ	15,026	-	15,026
Collateral received	7,409	-	7,409
Deposits and other borrowings	777,102	30,087	807,189
Derivative financial instruments	-	42,728	42,728
Payables and other liabilities	11,039	6,943	17,982
Debt issuances	125,362	1,747	127,109
Total	935,938	81,505	1,017,443

12. Fair value of financial assets and financial liabilities, cont'd

Financial Assets and Financial Liabilities Measured at Fair Value

The fair values of financial assets and financial liabilities are generally determined at the individual instrument level. If the Group holds offsetting risk positions, then the portfolio exception in AASB 13 *Fair Value Measurement* (AASB 13) is used to measure the fair value of such groups of financial assets and financial liabilities. The Group measures the portfolio based on the price that would be received to sell a net long position (an asset) for a particular risk exposure, or to transfer a net short position (a liability) for a particular risk exposure.

a) Fair value designation

The Group designates certain loans and advances, deposits and other borrowings and debt issuances as fair value through profit or loss:

- where they contain separable embedded derivatives and are managed on a fair value basis, the total fair value movements are recognised in profit or loss in the same period as the movement on any associated hedging instruments; or
- in order to eliminate an accounting mismatch which would arise if the assets or liabilities were otherwise carried at amortised cost. This mismatch arises due to measuring the derivative financial instruments (used to mitigate interest rate risk of these assets or liabilities) at fair value through profit or loss.

The Group's approach ensures that it recognises the fair value movements on the assets or liabilities in profit or loss in the same period as the movement on the associated derivatives.

The Group may also designate certain loans and advances, deposits and other borrowings and debt issuances as fair value through profit or loss where they are managed on a fair value basis to align the measurement with how the financial instruments are managed.

b) Fair value approach and valuation techniques

The Group uses valuation techniques to estimate the fair value of assets and liabilities for recognition, measurement and disclosure purposes where no quoted price in an active market for that asset or liability exists. This includes the following:

Asset or Liability	Fair Value Approach
Financial instruments classified as: • Derivative financial assets and financial liabilities (including trading and non-trading) • Repurchase agreements < 90 days • Net loans and advances • Deposits and other borrowings • Debt issuances	Discounted cash flow techniques are used whereby contractual future cash flows of the instrument are discounted using wholesale market interest rates, or market borrowing rates for debt or loans with similar maturities or yield curves appropriate for the remaining term to maturity.
Other financial instruments held for trading: • Securities sold short • Debt and equity securities	Valuation techniques are used that incorporate observable market inputs for financial instruments with similar credit risk, maturity and yield characteristics. Equity securities where an active market does not exist are measured using comparable company valuation multiples (such as price-to-book ratios).
Financial instruments classified as: • Investment securities – debt or equity	Valuation techniques use comparable multiples (such as price-to-book ratios) or discounted cashflow (DCF) techniques incorporating, to the extent possible, observable inputs from instruments with similar characteristics.

There were no significant changes to valuation approaches during the current or prior periods.

c) Fair value hierarchy

The Group categorises assets and liabilities carried at fair value into a fair value hierarchy in accordance with AASB 13 based on the observability of inputs used to measure the fair value:

- Level 1 - valuations based on quoted prices (unadjusted) in active markets for identical assets or liabilities;
- Level 2 - valuations using inputs other than quoted prices included within Level 1 that are observable for a similar asset or liability, either directly or indirectly; and
- Level 3 - valuations where significant unobservable inputs are used to measure the fair value of the asset or liability.

There were no significant changes to levelling approaches during the current or prior periods.

12. Fair value of financial assets and financial liabilities, cont'd

The following table presents financial assets and financial liabilities carried at fair value in accordance with the fair value hierarchy:

	Fair value measurements			
As at March 2025	**Level 1 $M**	**Level 2 $M**	**Level 3 $M**	**Total $M**
Assets				
Cash and cash equivalents (measured at fair value)	**-**	**55,284**	**-**	**55,284**
Trading assets[1]	**24,200**	**21,530**	**15**	**45,745**
Derivative financial instruments[1]	**107**	**49,423**	**22**	**49,552**
Investment securities[1]	**114,369**	**32,590**	**1,196**	**148,155**
Net loans and advances (measured at fair value)	**-**	**21,335**	**233**	**21,568**
Total	**138,676**	**180,162**	**1,466**	**320,304**
Liabilities				
Deposits and other borrowings (designated at fair value)	**-**	**55,453**	**-**	**55,453**
Derivative financial instruments[1]	**421**	**43,848**	**10**	**44,279**
Payables and other liabilities	**3,737**	**347**	**-**	**4,084**
Debt issuances (designated at fair value)	**-**	**2,242**	**-**	**2,242**
Total	**4,158**	**101,890**	**10**	**106,058**
As at September 2024				
Assets				
Cash and cash equivalents (measured at fair value)	-	37,255	-	37,255
Trading assets[1]	31,507	14,233	15	45,755
Derivative financial instruments[1]	131	54,214	25	54,370
Investment securities[1]	111,060	21,055	1,056	133,171
Net loans and advances (measured at fair value)	-	24,429	357	24,786
Total	142,698	151,186	1,453	295,337
Liabilities				
Deposits and other borrowings (designated at fair value)	-	43,001	-	43,001
Derivative financial instruments[1]	393	54,846	15	55,254
Payables and other liabilities	5,804	219	-	6,023
Debt issuances (designated at fair value)	-	1,816	-	1,816
Total	6,197	99,882	15	106,094
As at March 2024				
Assets				
Cash and cash equivalents (measured at fair value)	-	23,064	-	23,064
Trading assets[1]	29,315	13,126	1	42,442
Derivative financial instruments[1]	228	47,226	27	47,481
Investment securities[1]	87,121	21,651	946	109,718
Net loans and advances (measured at fair value)	-	23,428	599	24,027
Total	116,664	128,495	1,573	246,732
Liabilities				
Deposits and other borrowings (designated at fair value)	-	30,087	-	30,087
Derivative financial instruments[1]	192	42,521	15	42,728
Payables and other liabilities	6,659	284	-	6,943
Debt issuances (designated at fair value)	-	1,747	-	1,747
Total	6,851	74,639	15	81,505

1. *During the March 2025 half, $8,290 million of assets were transferred from Level 1 to Level 2, (Sep 24: $1,119 million; Mar 24: $2,435 million), and $805 million of assets were transferred from Level 2 to Level 1 (Sep 24: $4,913 million; Mar 24: $4,082 million) due to a change in the observability of market price and/or valuation inputs. There were no other material transfers between Level 1, Level 2 and Level 3 during the period. Transfers into and out of levels are measured at the beginning of the reporting period in which the transfer occurred, and as such the September 2024 half does not include assets and liabilities acquired as part of the Suncorp Bank acquisition during the period.*

12. Fair value of financial assets and financial liabilities, cont'd

Fair Value Measurements Incorporating Unobservable Market Data

a) Level 3 fair value measurements

Level 3 financial instruments are a net asset of $1,456 million (Sep 24: $1,438 million; Mar 24: $1,558 million). The assets and liabilities which incorporate significant unobservable inputs are:

- equity and debt securities for which there is no active market or traded prices cannot be observed;
- loans and advances measured at fair value for which there is no observable market data; and
- derivatives referencing market rates that cannot be observed primarily due to lack of market activity.

Level 3 Transfers

There were no material transfers into or out of Level 3 during the period.

The material Level 3 financial instruments as at 31 March 2025 are summarised below:

i) Investment Securities - equity holdings classified as FVOCI

Bank of Tianjin (BoT)

The Group holds an investment in the Bank of Tianjin. The investment is valued based on comparative price-to-book (P/B) multiples (a P/B multiple is the ratio of the market value of equity to the book value of equity). The extent of judgement applied in determining the appropriate multiple and comparator group from which the multiple is derived resulted in the Level 3 classification. As at 31 March 2025, the BoT equity holding balance was $1,097 million (Sep 24: $958 million, Mar 24: $848 million). The increase in BoT fair valuation was driven by an increase in the book value and P/B multiple used in the valuation, and the impact of foreign currency translation.

Other equity investments

The Group holds $99 million (Sep 24: $98 million; Mar 24: $98 million) of unlisted equities classified as FVOCI, for which there are no active markets or traded prices available, resulting in a Level 3 classification.

ii) Net loans and advances - classified as FVTPL

Syndicated loans

The Group holds $233 million (Sep 24: $357 million; Mar 24: $599 million) of syndicated loans for sale which are measured at FVTPL for which there is no observable market data available. The decrease in the Level 3 loan balances for the March 2025 half was mainly due to repayments.

b) Sensitivity to Level 3 data inputs

When we make assumptions due to significant inputs to a valuation not being directly observable (Level 3 inputs), then changing these assumptions changes the Group's estimate of the instrument's fair value. Favourable and unfavourable changes are determined by changing the primary unobservable parameters used to derive fair valuation.

Investment securities - equity holdings

The valuations of the equity investments are sensitive to variations in selected unobservable inputs, with valuation techniques used including P/B multiples and discounted cashflow techniques. If for example, a 10% increase or decrease to the primary input into the valuations were to occur (such as the P/B multiple), it would result in a $120 million increase or decrease in the fair value of the portfolio, which would be recognised in shareholders' equity in the Group, with no impact to net profit or loss.

Net loans and advances

Syndicated loan valuations are sensitive to credit spreads in determining their fair valuation. For the syndicated loans which are primarily investment-grade loans, an increase or decrease in credit spreads would have an immaterial impact on net profit or net assets of the Group. For the remaining syndicated loans, the Group may, where deemed necessary, utilise Credit Risk Insurance to mitigate the credit risks associated with those loans. The effect of this would also result in an immaterial impact to the net profit or net assets of the Group.

Other

The remaining Level 3 balance is immaterial and changes in inputs have a minimal impact on net profit and net assets of the Group.

c) Deferred fair value gains and losses

Where fair value is determined using unobservable inputs significant to the fair value of a financial instrument, the Group does not immediately recognise the difference between the transaction price and the amount determined based on the valuation technique (day one gains or losses) in profit or loss. After initial recognition, the Group recognises the deferred amount in profit or loss on a straight-line basis over the life of the transaction or until all inputs become observable. Day one gains and losses which have been deferred are not material.

12. Fair value of financial assets and financial liabilities, cont'd

Financial Assets and Liabilities Not Measured at Fair Value

The financial assets and financial liabilities listed below are measured at amortised cost on the Group's balance sheet. While this is the value at which we expect the assets will be realised and the liabilities settled, the Group provides an estimate of the fair value of the financial assets and financial liabilities at balance date in the table below.

Fair values of financial assets and liabilities carried at amortised cost not included in the table below approximate their carrying values. These financial assets and liabilities are either short term in nature or are floating rate instruments that are re-priced to market interest rates on or near the end of the reporting period.

	Carrying amount in the balance sheet			Fair value
As at March 2025	**At amortised cost $M**	**At fair value $M**	**Total $M**	**$M**
Financial assets				
Investment securities	**6,917**	**148,155**	**155,072**	**155,058**
Net loans and advances	**799,284**	**21,568**	**820,852**	**821,246**
Total	**806,201**	**169,723**	**975,924**	**976,304**
Financial liabilities				
Deposits and other borrowings	**918,177**	**55,453**	**973,630**	**973,721**
Debt issuances	**167,313**	**2,242**	**169,555**	**170,823**
Total	**1,085,490**	**57,695**	**1,143,185**	**1,144,544**
As at September 2024				
Financial assets				
Investment securities	7,091	133,171	140,262	140,249
Net loans and advances	779,246	24,786	804,032	804,136
Total	786,337	157,957	944,294	944,385
Financial liabilities				
Deposits and other borrowings	862,165	43,001	905,166	905,369
Debt issuances	154,572	1,816	156,388	157,727
Total	1,016,737	44,817	1,061,554	1,063,096
As at March 2024				
Financial assets				
Investment securities	7,900	109,718	117,618	117,616
Net loans and advances	691,794	24,027	715,821	714,934
Total	699,694	133,745	833,439	832,550
Financial liabilities				
Deposits and other borrowings	777,102	30,087	807,189	806,994
Debt issuances	125,362	1,747	127,109	127,921
Total	902,464	31,834	934,298	934,915

13. Shareholders' equity

Shareholders' Equity

Shareholders' equity	As at Mar 25 $M	As at Sep 24 $M	As at Mar 24 $M	Movement Mar 25 v. Sep 24	Movement Mar 25 v. Mar 24
Ordinary share capital	**27,028**	27,065	29,033	0%	-7%
Reserves					
Foreign currency translation reserve[1]	**253**	(360)	192	large	32%
Share option reserve	**77**	105	72	-27%	7%
FVOCI reserve	**(991)**	(979)	(632)	1%	57%
Cash flow hedge reserve	**(219)**	(422)	(1,120)	-48%	-80%
Transactions with non-controlling interests reserve	**(22)**	(22)	(22)	0%	0%
Total reserves	**(902)**	(1,678)	(1,510)	-46%	-40%
Retained earnings	**43,822**	42,602	41,911	3%	5%
Share capital and reserves attributable to shareholders of the Company	**69,948**	67,989	69,434	3%	1%
Non-controlling interests	**764**	771	768	-1%	-1%
Total shareholders' equity	**70,712**	68,760	70,202	3%	1%

1. *As a result of the closure of a number of international entities, the associated foreign currency translation reserve was recycled from Other comprehensive income to Income Statement, resulting in a $15 million gain recognised in Other operating income for the March 2025 half (Sep 24 half: $2 million gain; Mar 24 half: $20 million gain).*

Ordinary Share Capital

The Company share capital comprises 3,003,366,782 fully paid shares as at 31 March 2025 (Sep 24: 3,003,366,782; Mar 24: 3,003,366,782).

Non-Controlling Interests

	Profit attributable to non-controlling interests			Equity attributable to non-controlling interests			Dividend paid to non-controlling interests		
	Half Year			As at			Half Year		
	Mar 25 $M	Sep 24 $M	Mar 24 $M	Mar 25 $M	Sep 24 $M	Mar 24 $M	Mar 25 $M	Sep 24 $M	Mar 24 $M
ANZ Bank New Zealand PPS	**19**	19	13	**750**	758	757	**20**	19	13
Other non-controlling interests	**2**	2	1	**14**	13	11	**-**	-	-
Total	**21**	21	14	**764**	771	768	**20**	19	13

14. Changes in composition of the Group

There were no acquisitions or disposals of material controlled entities for the half year ended 31 March 2025.

15. Investments in associates

	Half Year			Movement	
	Mar 25 $M	Sep 24 $M	Mar 24 $M	Mar 25 v. Sep 24	Mar 25 v. Mar 24
Share of associates' profit/(loss)	**54**	38	96	42%	-44%

Contributions to profit	Contribution to Group profit after tax			Ownership interest held by Group		
Associates	Half Year			As at		
	Mar 25 $M	Sep 24 $M	Mar 24 $M	Mar 25 %	Sep 24 %	Mar 24 %
P.T. Bank Pan Indonesia (PT Panin)	**54**	38	31	**39**	39	39
AMMB Holdings Berhad (AmBank)[1]	**-**	-	65	**-**	-	5
Share of associates' profit/(loss)	**54**	38	96			

1. *On 6 March 2024, the Group partially disposed of its interest in AmBank, reducing its investment by $668 million and its ordinary share interest from 22% to 5%. Following the decrease in ownership, the Group ceased equity accounting for AmBank and reclassified the investment of $221 million as Investment securities at fair value through other comprehensive income. On 31 May 2024, the Group disposed of its remaining 5% interest in AmBank.*

16. Related party disclosure

There have been no transactions with related parties that are significant to understanding the changes in financial position and performance of the Group since 30 September 2024.

17. Commitments, contingent liabilities and contingent assets

Credit Related Commitments and Contingencies

	Half Year			Movement	
	Mar 25 $M	**Sep 24 $M**	**Mar 24 $M**	**Mar 25 v. Sep 24**	**Mar 25 v. Mar 24**
Contract amount of:					
Undrawn facilities	**268,797**	249,988	239,898	8%	12%
Guarantees and letters of credit	**23,764**	22,509	23,390	6%	2%
Performance related contingencies	**27,963**	26,501	26,932	6%	4%
Total	**320,524**	298,998	290,220	7%	10%

Other Contingent Liabilities and Contingent Assets

There are outstanding court proceedings, claims and possible claims for and against the Group. Where relevant, expert legal advice has been obtained and, in the light of such advice, provisions and/or disclosures as deemed appropriate have been made. In some instances, we have not disclosed the estimated financial impact of the individual items either because it is not practicable to do so or because such disclosure may prejudice the interests of the Group.

A description of the contingent liabilities and contingent assets as at 31 March 2025 is set out below.

Contingent Liabilities

- **Regulatory and customer exposures**

  The Group regularly engages with its domestic and international regulators and other statutory and supervisory bodies. The nature of these regulatory interactions can be wide ranging and include regulatory investigations, surveillance and reviews, reportable situations, formal and informal inquiries and regulatory supervisory activities in Australia and globally. The Group also receives notices and requests for information from its regulators and other bodies from time to time as part of both industry-wide and Group-specific reviews and makes disclosures to its regulators at its own instigation.

  There has been a recent increase in the number of matters on which the Group has engaged with its regulators. Recent interactions relate to matters including:

  - markets transactions and data reporting;
  - anti-money laundering and counter-terrorism financing obligations, processes and procedures; and
  - non-financial risk management practices including customer service processes relating to complaints, hardship, deceased estates and remediation, compliance with mandatory reporting obligations, the application of interest and fees on certain products and the financial accountability regime.

  The possible exposures associated with the Group's regulatory interactions may include civil enforcement actions, criminal proceedings, fines and penalties, imposition of capital or liquidity requirements, customer remediation, the requirement to conduct independent reviews, sanctions or the exercise of other regulatory powers.

  There may also be exposures to customers, third parties and shareholders which are additional to any regulatory exposures. These could include class actions or claims for compensation or other remedies.

  The outcomes and total costs associated with these possible regulatory, customer and other exposures remain uncertain.

- **South African rate action**

  In February 2017, the South African Competition Commission commenced proceedings against local and international banks including the Company alleging breaches of the cartel provisions of the *South African Competition Act* in respect of trading in the South African rand. The potential civil penalty or other financial impact is uncertain.

- **Esanda dealer car loan litigation**

  In August 2020, a class action was brought against the Company alleging unfair conduct, misleading or deceptive conduct and equitable mistake in relation to the use of flex commissions in dealer arranged Esanda car loans. An agreement to settle the claim was reached in October 2024. The Company will pay $85 million in settlement, which is covered by existing provisions held at 31 March 2025. The settlement is without admission of liability and remains subject to court approval.

- **OnePath superannuation litigation**

  In December 2020, a class action was brought against OnePath Custodians, OnePath Life and the Company alleging that OnePath Custodians breached its obligations under superannuation legislation, and its duties as trustee, in respect of superannuation investments and fees. The claim also alleges that the Company was involved in some of OnePath Custodians' investment breaches. An agreement to settle the claim was reached in October 2024. The Company will contribute $14 million to the settlement, which is covered by existing provisions held at 31 March 2025. The settlement is without admission of liability and remains subject to court approval.

- **New Zealand loan information litigation**

  In September 2021, a representative proceeding was brought against ANZ Bank New Zealand Limited, alleging breaches of disclosure requirements under consumer credit legislation in respect of variation letters sent to certain loan customers. ANZ Bank New Zealand Limited is defending the allegations.

17. Commitments, contingent liabilities and contingent assets, cont'd

- **Security recovery actions**

  Various claims have been made or are anticipated, arising from security recovery actions taken to resolve impaired assets. These claims will be defended.

- **Warranties, indemnities and performance management fees**

  The Group has provided warranties, indemnities and other commitments in favour of the seller/purchaser and other persons in connection with various acquisitions/disposals of businesses and assets and other transactions, covering a range of matters and risks. It is exposed to claims under those warranties, indemnities and commitments, some of which are currently active. The outcomes and total costs associated with these exposures remain uncertain.

  The Group has entered into an arrangement to pay performance fees to external fund managers in the event predetermined performance criteria are satisfied in relation to certain Group investments. The satisfaction of the performance criteria and associated performance fee remains uncertain.

- **Clearing and settlement obligations**

  Certain group companies have a commitment to comply with rules governing various clearing and settlement arrangements which could result in a credit risk exposure and loss if another member institution fails to settle its payment clearing activities. The Group's potential exposure arising from these arrangements is unquantifiable in advance.

  Certain group companies hold memberships of central clearing houses, including ASX Clear (Futures), London Clearing House (LCH) SwapClear, Korea Exchange (KRX), Hong Kong Exchange (HKEX), the Clearing Corporation of India, Taiwan Futures Exchange and the Shanghai Clearing House. These memberships allow the relevant group company to centrally clear derivative instruments in line with cross-border regulatory requirements. Common to all of these memberships is the requirement for the relevant group company to make default fund contributions. In the event of a default by another member, the relevant group company could potentially be required to commit additional default fund contributions which are unquantifiable in advance.

- **Parent entity guarantees**

  Certain group companies have issued letters of comfort and guarantees in respect of certain subsidiaries in the normal course of business. Under these letters and guarantees, the issuing entity undertakes to ensure that those subsidiaries continue to meet their financial obligations, subject to certain conditions including that the subsidiary remains a controlled entity.

- **Sale of Grindlays business**

  On 31 July 2000, the Company completed the sale to Standard Chartered Bank (SCB) of ANZ Grindlays Bank Limited (Grindlays) and certain other businesses. The Company provided warranties and indemnities relating to those businesses.

  The indemnified matters include civil penalty proceedings and criminal prosecutions brought by Indian authorities against Grindlays and certain of its officers, in relation to certain transactions conducted in 1991 that are alleged to have breached the *Foreign Exchange Regulation Act, 1973*. Civil penalties were imposed in 2007 which are the subject of ongoing appeals.

Contingent Assets

- **National Housing Bank**

  The Company is pursuing recovery of the proceeds of certain disputed cheques which were credited to the account of a former Grindlays customer in the early 1990s.

  The disputed cheques were drawn on the National Housing Bank (NHB) in India. Proceedings between Grindlays and NHB concerning the proceeds of the cheques were resolved in early 2002.

  Recovery is now being pursued from the estate of the Grindlays customer who received the cheque proceeds. Any amounts recovered are to be shared between the Company and NHB.

18. Suncorp Bank acquisition

On 31 July 2024, the Group acquired 100% of the shares in SBGH Limited, the immediate holding company of Norfina Limited (formerly known as Suncorp-Metway Limited, and trading as Suncorp Bank).

The Group progressed its purchase price allocation (PPA), to identify and measure the assets acquired and liabilities assumed at acquisition date. The significant adjustments to provisionally determined balances arising from the PPA exercise included the recognition of core deposit and brand intangible assets, fair value adjustments to gross loans and advances to reflect changes in interest rates and credit since loan origination, provisions for contingent liabilities and related indemnities and related deferred tax balances with a corresponding decrease to goodwill of $197 million. The provisional goodwill balance is $1,205 million at 31 March 2025 and is attributable to the assembled workforce and expected synergies arising from the economies of scale from the integration and consolidation of platforms and funding benefits. It will not be deductible for tax purposes.

The impacts on the provisional balances as at 31 July 2024 are disclosed below. Prior periods have not been restated.

The core deposit intangible was valued at $633 million under a discounted cash flow approach using a multi-period excess earnings model to calculate the present value of the funding costs savings obtained, comparing the difference between the cost of existing core deposits and the cost of alternative sources of funding over the expected life of the core deposit base. The discount rates used were calculated using the cost of capital plus a risk premium. The value of the core deposit intangible asset is influenced by its estimated lifespan and by fluctuations in the estimated costs of alternative funding options. The asset will be amortised over its expected life of six years.

The balances continue to be provisionally accounted pending completion of the assessment of the fair values of assumed contingent liabilities and associated indemnities and deferred tax balances, and further adjustments may arise in the September 2025 half.

Assets acquired and liabilities assumed as at 31 July 2024	Provisional at 30 September 2024 $M	1H25 Adjustments $M	Provisional at 31 March 2025 $M
Assets			
Cash and cash equivalents	1,333	-	**1,333**
Collateral paid	80	-	**80**
Trading assets	2,307	-	**2,307**
Derivative financial instruments	310	-	**310**
Investment securities	9,920	-	**9,920**
Gross loans and advances	69,745	(198)	**69,547**
Deferred tax assets	48	(48)	**-**
Intangible assets	103	685	**788**
Other assets	431	83	**514**
Total assets	**84,277**	**522**	**84,799**
Liabilities			
Collateral received	48	-	**48**
Deposits and other borrowings	62,438	(2)	**62,436**
Derivative financial instruments	279	-	**279**
Deferred tax liabilities	-	216	**216**
Payables and other liabilities	731	(6)	**725**
Provisions	89	127	**216**
Debt issuances	15,847	(10)	**15,837**
Total liabilities	**79,432**	**325**	**79,757**
Net assets acquired	**4,845**	**197**	**5,042**
Cash consideration paid[1]	6,247	-	**6,247**
Provisional value of Goodwill	**1,402**	**(197)**	**1,205**

1. *The cash consideration of $6,247 million includes payment for Suncorp Bank's Tier 2 notes ($606 million) and Capital Notes ($564 million).*

19. Significant events since balance date

On 3 April 2025, the Group confirmed that the Company has entered into a court enforceable undertaking with APRA for matters relating to non-financial risk management practices and risk culture across the Group, which includes an additional operational risk capital overlay of $250 million that increases operational risk RWA by $3.1 billion and will apply to both Level 1 and Level 2 from 30 April 2025.

Other than the matter above, there have been no significant events from 31 March 2025 to the date of signing this report.

Directors' Declaration

The Directors of Australia and New Zealand Banking Group Limited declare that:

1. in the Directors' opinion the Condensed Consolidated Financial Statements and Notes to the Condensed Consolidated Financial Statements are in accordance with the *Corporations Act 2001*, including:
    - section 304, that they comply with the Australian Accounting Standards and any further requirements in the *Corporations Regulations 2001*; and
    - section 305, that they give a true and fair view of the financial position of the Group as at 31 March 2025 and of its performance for the half year ended on that date; and
2. in the Directors' opinion as at the date of this declaration there are reasonable grounds to believe that the Company will be able to pay its debts as and when they become due and payable.

Signed in accordance with a resolution of the Directors.

Paul D O'Sullivan
Chairman

Shayne C Elliott
Managing Director

7 May 2025

KPMG

Independent Auditor's Review Report to the shareholders of Australia and New Zealand Banking Group Limited

Conclusion

We have reviewed the accompanying Condensed Consolidated Financial Statements of Australia and New Zealand Banking Group Limited (the Group).

Based on our review, which is not an audit, we have not become aware of any matter that makes us believe that the Condensed Consolidated Financial Statements of Australia and New Zealand Banking Group Limited do not comply with the *Corporations Act 2001*, including:

- giving a true and fair view of the Group's financial position as at 31 March 2025 and of its performance for the half year ended on that date; and
- complying *with Australian Accounting Standard AASB 134 Interim Financial Reporting* and the *Corporations Regulations 2001*.

The Condensed Consolidated Financial Statements comprise:

- The condensed consolidated balance sheet as at 31 March 2025;
- The condensed consolidated income statement, condensed consolidated statement of comprehensive income, condensed consolidated statement of changes in equity and condensed consolidated cash flow statement for the half year ended on that date;
- Notes 1 to 19 including selected explanatory notes; and
- The Directors' Declaration.

The Group comprises Australia and New Zealand Banking Group Limited (the Company) and the entities it controlled at the half year's end or from time to time during the half year.

Basis for Conclusion

We conducted our review in accordance with ASRE 2410 *Review of a Financial Report Performed by the Independent Auditor of the Entity* and *ISRE 2410 Review of Interim Financial Information Performed by the Independent Auditor of the Entity*. Our responsibilities are further described in the *Auditor's Responsibilities for the Review of the Financial Report* section of our report.

We are independent of the Group in accordance with the auditor independence requirements of the *Corporations Act 2001* and the ethical requirements of the *Accounting Professional and Ethical Standards Board's APES 110 Code of Ethics for Professional Accountants (including Independence Standards)* (the Code) that are relevant to our audit of the annual financial report in Australia. We have also fulfilled our other ethical responsibilities in accordance with these requirements.

Responsibilities of the Directors for the Condensed Consolidated Financial Statements

The Directors of the Company are responsible for:

- the preparation of the Condensed Consolidated Financial Statements that give a true and fair view in accordance with *Australian Accounting Standards* and the *Corporations Act 2001*; and
- such internal control as the Directors determine is necessary to enable the preparation of the Condensed Consolidated Financial Statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

Auditor's responsibility for the review of the Condensed Consolidated Financial Statements

Our responsibility is to express a conclusion on the Condensed Consolidated Financial Statements based on our review. ASRE 2410 and ISRE 2410 require us to conclude whether we have become aware of any matter that makes us believe that the Condensed Consolidated Financial Statements do not comply with the *Corporations Act 2001* including giving a true and fair view of the Group's financial position as at 31 March 2025 and its performance for the half year ended on that date, and complying with *Australian Accounting Standard AASB 134 Interim Financial Reporting* and the *Corporations Regulations 2001*.

A review of Condensed Consolidated Financial Statements consists of making enquiries, primarily of persons responsible for financial and accounting matters, and applying analytical and other review procedures. A review is substantially less in scope than an audit conducted in accordance with *Australian Auditing Standards* and *International Standards on Auditing* and consequently does not enable us to obtain assurance that we would become aware of all significant matters that might be identified in an audit. Accordingly, we do not express an audit opinion.

KPMG

Maria Trinci

KPMG

Maria Trinci
Partner

Melbourne
7 May 2025

Lead Auditor's Independence Declaration under Section 307C of the *Corporations Act 2001*

To the Directors of Australia and New Zealand Banking Group Limited

I declare that, to the best of my knowledge and belief, in relation to the review of Australia and New Zealand Banking Group Limited for the half year ended 31 March 2025 there have been:

(i) no contraventions of the auditor independence requirements as set out in the *Corporations Act 2001* in relation to the review; and

(ii) no contraventions of any applicable code of professional conduct in relation to the review.

KPMG

Maria Trinci
Partner

Melbourne
7 May 2025