



Anti-Bribery and Anti-Corruption Policy Summary

Why does ANZ have an Anti-Bribery and Anti-Corruption Policy?

ANZ is committed to:

- complying with all applicable anti-bribery and anti-corruption laws
- applying and maintaining the highest level of ethical behaviour and standards in combating bribery and corruption, and
- shaping a world where people and communities thrive.

The Anti-Bribery and Anti-Corruption Policy defines unacceptable behaviour and activity relating to bribery and corruption and puts in place a framework to ensure that bribery and corruption risks within ANZ's businesses are properly identified, mitigated and managed. It is one of the policies supporting ANZ's Code of Conduct.

How does the Anti-Bribery and Anti-Corruption Policy apply at ANZ?

The policy applies to all employees and contingent workers of Australia and New Zealand Banking Group Limited (ANZ) and its subsidiaries and controlled entities, including when acting at ANZ's direction in operational roles, as directors, or in any other capacity.

The implementation of the policy is supported by detailed requirements which serve as a single and consistent anti-bribery and anti-corruption standard across the ANZ group. As part of the prevention, detection and management of bribery and corruption issues, mandatory training is conducted throughout ANZ, with additional role-specific training tailored to particular roles. Regular risk assessments and monitoring activities are also conducted across the group to identify and manage bribery and corruption risks.

ANZ places great importance on fostering a culture that encourages employees and others to speak up about issues or conduct that concerns them. Everyone at ANZ is encouraged to immediately report any concerns or suspicions relating to bribery and corruption, and may use the mechanisms set out in the [Whistleblower Policy](#), which ensures disclosures are treated appropriately and the person raising the concern is protected and can remain anonymous. Instances of bribery or corruption may be investigated by Group Integrity and breaches of the policy may lead to disciplinary action, including dismissal.

Key obligations

Under the policy, ANZ and its employees and contingent workers will not:

- Directly or indirectly offer, promise, give, request, or agree to receive or accept a bribe in any form (including bribes in the form of a facilitation payment, secret commission or offer of employment)
- Offer or accept, directly or indirectly, gifts, entertainment, sponsored travel or any other benefit that could improperly influence, or be perceived to improperly influence, any person in order to obtain or retain business or any advantage of any kind for ANZ or any other person
- Offer or provide anything of value to a Public Official or any member of their family in order to improperly influence, or be perceived to improperly influence, in order to obtain or retain business, or secure any improper advantage of any kind for ANZ or any other person
- Make a donation or grant as a way of improperly influencing any person in order to obtain or retain business or an improper advantage of any kind for the benefit of ANZ or any other person
- Enter into, or continue, a business relationship with third parties (for example suppliers, agents, intermediaries, joint venture partners or proposed merger and acquisition targets) without appropriate due diligence being conducted and/or if it cannot be satisfied that the entity or individual will behave in a manner consistent with the policy
- Keep inaccurate books and records or keep accounts or transactions relating to dealings with third parties "off-book" to facilitate or conceal improper payments

Role of Compliance

Compliance will:

- Provide leadership, guidance, training, advice and direction to promote compliance with the policy
- Ensure effective reporting, escalation and resolution of bribery and corruption compliance issues