



THE ANTI-BRIBERY AND ANTI-CORRUPTION

BUSINESS INTEGRITY POLICY

APPROVED
GROUP ABAC OFFICE - JUNE 2021

THE ANTI-BRIBERY AND ANTI-CORRUPTION (ABAC) BUSINESS INTEGRITY POLICY

Quick Reference Guide

ANZ is committed to conducting business with integrity and to refrain from bribery and corruption in all its business dealings. This commitment is described in the Anti-Bribery and Anti-Corruption (ABAC) Business Integrity Policy. At the heart of the Policy are seven Principles that we must adhere to:



Principle 1: We do business with integrity

To always do business with integrity, all employees of ANZ, including third parties such as suppliers, agents and joint venture partners must refrain from bribery and corruption in all business dealings, including with public officials, to which ANZ is a party.



Principle 2: We are transparent with our financial and ownership interests

To be transparent in our financial and ownership interests, employees must always declare such interests and do not give, offer, promise, request, receive, agree to or accept gifts, entertainment, sponsored travel, donations, grants or sponsorships which may impair or be perceived to impair business judgement.



Principle 3: We know our third parties and hold them to our standards of business integrity

To know our third parties and hold them to our standards of business integrity, employees must conduct risk based due diligence on them, and take steps to mitigate any identified risks before engaging such third parties.



Principle 4: We understand the content of the Policy

To ensure our employees understand the content of the Policy, management must design training and awareness programs that meet legal and our ethical standards and implement it on a risk-based approach throughout ANZ.



Principle 5: We keep accurate books, records and accounts

To keep accurate books, records and accounts, employees must maintain records that are truthful, complete, accurate, and accessible.



Principle 6: We always report suspected or observed Policy breaches

In order to report suspected or observed Policy breaches, employees must immediately raise such suspicions or incidences using the channels described in the Policy.



Principle 7: We maintain appropriate anti-bribery and anti-corruption business practices and procedures

Ensure we monitor and supervise ABAC activities appropriately, management must take reasonable and proportional measures to maintain ABAC risk management capacity, review business dealings, report ABAC matters at management and governance committees, and take timely action to address identified risks and concerns.

Note: Printed versions of this document may be obsolete. Please check MAX for the latest version of this policy.

