



Anti-Money Laundering and Counter-Terrorism Financing Policy Summary

Why does ANZ have an Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Policy?

To manage ANZ's approach to detection, deterrence and disruption of money laundering, terrorism-financing and proliferation financing activities that may be facilitated through the use of ANZ products or services and to meet regulatory expectations.

It is one of the policies supporting ANZ's Code of Conduct.

How does the Anti-Money Laundering and Counter-Terrorism Financing Policy apply at ANZ?

The policy applies to all employees and contingent workers of Australia and New Zealand Banking Group Limited (ANZ) and its controlled entities (excluding Suncorp Bank).

The implementation of the Policy is supported by Standards and all employees and contingent workers complete mandatory training annually.

Breaches of the policy may lead to disciplinary action, including performance or remuneration consequences, dismissal, as well as criminal, civil or regulatory consequences.

Key obligations

ANZ will:

- identify, assess, mitigate and manage the money laundering, terrorism financing and proliferation financing risks
- complete customer due diligence proportionate to the money laundering, terrorism financing and proliferation financing risks posed by our customers acquired across all channels including non-face-to-face
- complete enhanced and ongoing customer due diligence, obtaining senior management approval for those customers deemed high risk, including politically exposed persons
- monitor for indicators of unusual activity in customer transactions and behaviours, reporting to appropriate authorities' suspicious activity, including where a person may not be who they claim to be
- file all reports required by the relevant anti-money laundering and counter-terrorism financing regulators
- ensure that third parties acting on ANZ's behalf are subject to appropriate due diligence and act in accordance with the ANZ Anti-Money Laundering and Counter-Terrorism Financing Program
- comply with applicable AML/CTF regulatory obligations for transfers of value
- exercise appropriate ongoing governance and oversight from governance bodies and senior management over compliance with the policy
- complete AML/CTF due diligence and training for employees and contingent workers
- retain all records that may be relevant to anti-money laundering and counter-terrorism financing activities for a minimum of 7 years.

Role of Compliance

Compliance will:

- provide leadership, guidance, advice and direction to promote compliance with the policy
- ensure effective reporting, escalation and resolution of anti-money laundering, counter-terrorism and proliferation financing compliance issues.

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