

Whistleblower Policy

Policy Owner: Chief Compliance Officer

Version 11

Policy Level: Level 2 – Global

July 2019

I. BACKGROUND AND PURPOSE

Australia and New Zealand Banking Group Limited (**ANZ**) has a strong values based culture that encourages openness, integrity and accountability.

ANZ's Whistleblower Policy has been developed so that you can freely and without fear of detriment raise concerns regarding situations where you believe that ANZ, including any of its controlled entities or related bodies corporate, globally (together, the **ANZ Group**), or anyone connected to the ANZ Group, have acted in a way that constitutes misconduct (as set out below).

This Policy explains how you can report such concerns, how they will be investigated, what you can expect, and other sources of information that may be helpful to you in reporting your concern.

This Policy will be made available on the ANZ public website and on the intranet (**MAX**) for ANZ staff.

II. PRINCIPLES

1. Higher Standard - This Policy is designed to comply with ANZ's legal obligations. If anything in this Policy is inconsistent with any law imposed on ANZ, including laws of any country in which ANZ operates, that legal obligation or the "higher standard" will prevail over this Policy.

2. Speak Up and Report It! - If you are a current employee of ANZ, please consider whether you would prefer to report your concern via another channel such as your Line Manager, Skip Line Manager, or the Risk, Compliance, or Talent & Culture teams at ANZ. To check if these options are for you, please refer to Report It! and Action/Raise a concern (Talent & Culture) on MAX.

3. ANZ's Expectations of You - ANZ expects you to act honestly and ethically, and to make a report on reasonable grounds.

4. Confidentiality and Consent - ANZ will maintain confidentiality of all reports and your identity as a reporter to the fullest extent possible. While ANZ encourages you to identify yourself to the Whistleblower Program by giving consent, you can still report on an anonymous basis.

5. Investigations and Outcomes - All investigations will be conducted in a timely manner, in accordance with the principles of fairness and natural justice and appropriately documented. Where possible, ANZ will update you on the status and outcomes of your report.

6. Protection from Detrimental Conduct - ANZ will not tolerate detrimental conduct, that causes or is intended to cause harm to you because you or someone else has made or intends to make a report (or because you or someone else might or could make a report). ANZ will take reasonable measures to protect you, as well as individuals conducting, assisting or participating in an investigation from detriment.

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7. Regulators – You have the right to communicate with regulators and law enforcement authorities at any time in relation to your concerns or any matter relating to this Policy.

Some of these Principles are further explained throughout this Policy.

III. SCOPE

A. CAN I MAKE A REPORT UNDER THIS POLICY

You can make a report under this Policy if you are a current or former:

- a) employee of the ANZ Group;
- b) a person who is providing, or has provided goods or services to the ANZ Group, whether paid or unpaid (e.g. volunteering), and this includes contingent workers and suppliers;
- c) employee or a sub-contractor of a person identified in (b) above;
- d) an officer or an associate of the ANZ Group, for example, a director or secretary of ANZ or of a related body corporate of ANZ; or
- e) a relative or family member of any of the individuals identified at (a) to (d) above, and
 - i your concern is not one of the Excluded Matters outlined below;
 - ii you do not feel safe or comfortable to raise your concern via ANZ's other channels as outlined in Principle 2 above; and
 - iii you have a reasonable and genuine concern about actual or suspected misconduct within or by ANZ, or the ANZ Group and anyone at or connected with the ANZ Group.

Examples of what might constitute misconduct include:

1. breaches of ANZ's Code of Conduct;
2. practices or behaviours of concern relating to compliance with policies, procedures or the law (i.e. including anything you think may be illegal);
3. unethical or unprofessional behaviour, including conduct that does not meet ANZ's commitment to do the right thing by its customers, regulators, shareholders and or the community;
4. issues of honesty or integrity, including internal fraud, theft, bribery and corruption;
5. conflicts of interest, including those relating to outside business interests, relationships, improper payments and donations;
6. breaches of privacy or confidentiality, including in relation to ANZ and customer information;
7. potential breaches of human rights standards;
8. concerns that pose a danger to the public or financial system;
9. misconduct or an improper state of affairs or circumstances in relation to the ANZ Group generally, including the tax affairs of the ANZ Group; and
10. a practice or behaviour of concern that relates to your current or past employment within the ANZ Group that has significant implications for the ANZ Group, presents a danger to the public or financial system, or is otherwise a breach of law.

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B. EXCLUDED MATTERS

While everyone is encouraged to speak up and report any concerns to ANZ, not everyone nor all types of concerns are intended to be covered by this Policy. Examples of the matters that are generally not intended to be covered by this Policy are:

Exclusion 1: Customer Complaints

If you are a customer and are concerned with the way ANZ has handled any matter, product, or service, including an existing complaint, please contact ANZ with your concern via phone, email, online or post: <https://www.anz.com.au/support/contact-us/compliments-suggestions-complaints/>.

Exclusion 2: Personal Work-related Grievances

If you are a current or former employee of ANZ and want to report a grievance that directly affects you personally (and only you) in the context of your current or past employment, please contact ANZ's Employee Relations team via ANZ People Assist.

In addition, ANZ has other dedicated processes in place available to employees through which it may be more appropriate to report a particular concern. Please refer to Principle 2 above.

IV. HOW DO I MAKE A REPORT OR FIND OUT MORE INFORMATION ABOUT THE PROCESS?

You can find out more information about the reporting process, or make a report via email, telephone, post, or using our external online service or even via QR Code. Whichever method you choose below, a Whistleblower Protection Officer will be assigned to your report and will work with the Whistleblower Program Team to assess your report and arrange for an investigation, if appropriate. For further information on the roles and responsibilities of these individuals, please see Part VII below. The different ways you can make a report or find out more information, are:

Whistleblower Protection Officer (WPOs): You can contact a WPO directly. A WPO is an individual within ANZ who has specific responsibilities including protecting those who make a report under this Policy. In all cases, one of the below WPOs will be assigned to your report to so that that it is assessed and where appropriate, investigated:

- a) Group Integrity Lead and Principal WPO :
David McGowan | 📞 +61 3 8655 1757 | ✉️ David.McGowan@anz.com
- b) Chief Compliance Officer
- c) Group General Manager Internal Audit
- d) Head of Regulatory and Conduct Risk

Whistleblower Program Team (WP Team): You can contact the WP Team directly via email: ✉️ whistleblowing@anz.com. The WP Team includes the Group Integrity Lead and forms part of the Group Integrity function at ANZ.

Deloitte: You can make a report through ANZ's External Whistleblower Reporting Service which is managed by Deloitte. You can make a report (including an anonymous report) via:

Website: www.anz.deloitte.com.au

QR code: You can also access this website via the below QR code but you will need a QR reader (which you can download online):

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Hotline: Australia: ☎ 1800 997 448 (Toll Free) | New Zealand: ☎ 0800 376 325 (Toll Free) | Other International: ☎ +61 3 9667 3731

Postal mail: ANZ Whistleblower Service
Reply Paid 12628
A'Beckett Street, Melbourne, Victoria
Australia 8006

Other Eligible Recipients (OER): There are other individuals who are also eligible to receive reports and who are required to handle that information in accordance with this Policy. This includes members of the Executive Committee (ExCo) and directors and company secretaries of the ANZ Group, certain members of Group Tax and Internal Audit and internal actuaries of the ANZ Group. Ultimately all reports received by OERs will be referred to a WPO and the WP Team unless there are exceptional circumstances. ANZ therefore recommends that you make your report via one of the other methods outlined above.

V. WHAT IF MY CONCERNS RELATE TO CONDUCT, PEOPLE OR OPERATIONS OUTSIDE OF AUSTRALIA?

You can make a report regardless of where you are or where the conduct is occurring. If your report concerns conduct, people, or operations located outside of Australia, there may be some specific requirements, depending on which country is involved. Please see the **Country Schedules**. If there is no separate Country Schedule for a country, the general provisions of this Policy apply in full.

VI. I HAVE MADE A REPORT UNDER THIS POLICY. WHAT NEXT?

A. CONFIDENTIALITY AND CONSENT (PRINCIPLE 4)

When you make a report or shortly after, ANZ will seek your consent in relation to how you would prefer information about your identity, including any information that is likely to identify you, to be handled (hereinafter, all such information will be referred to as your **Identity**). You can select one of three options for protecting your Identity:

Confidential - this means that you consent to the WPO and WP Team knowing your Identity and for the WPO and WP Team to disclose your Identity for the purposes of investigating, and for reporting to relevant stakeholders. This is the preferred option because ANZ will be best placed to fully investigate the matter, and provide you with ongoing protection and support.

Partially Anonymous - this means that you have consented to only the WPO and WP Team knowing your Identity. While this approach is possible, it may create some limitations for investigative purposes which the WP Team can talk to you about.

Anonymous - this means you haven't told ANZ, the WP Team or the WPO who you are. This is the least preferred option because ANZ won't be able to seek further information from you, update you, and in some circumstances, it could be difficult to investigate the matter fully or even at all. Knowing your identity may help ANZ improve the effectiveness of the investigation.

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Note that for legal and regulatory reasons, ANZ may need to disclose your Identity to lawyers, regulators and or law enforcement authorities, regardless of the level of consent you have provided.

To help protect you and your Identity, please don't share details of the matter, your report, or what ANZ tells you with others outside of the WP Team. Of course, you have the right to communicate with regulators and law enforcement authorities at any time (see Principle 7 in Part II above).

B. INVESTIGATION AND OUTCOMES (PRINCIPLE 5)

After receiving a report from you, ANZ will:

- Assess your report;
- Consider any conflicts of interest prior to investigating;
- Determine whether and how to investigate; and
- Appoint a Whistleblower Investigator if appropriate.

Whistleblower Investigators are predominantly from ANZ's Group Integrity and/or Employee Relations teams but may include others with the appropriate skills and subject matter expertise where required. Whistleblower Investigators are briefed on your report and the confidentiality requirements. Investigations are to be conducted in a timely, fair and impartial manner, and investigators are required to act independently and competently and to treat all those involved in a report fairly so that that each case is evaluated on its merits. Any individuals who are accused of misconduct in a report (a **Respondent**) will have an opportunity to respond to allegations before any adverse findings of fact in any investigation are made and before any disciplinary action (if appropriate) is taken.

The Whistleblower Investigator may need to contact you for further information for the investigation. If you have not provided your consent to be contacted, or if you decline or can't provide further information, this may affect ANZ's ability to investigate, but we will endeavour to let you know if this is the case. Records of the report and investigation will be securely retained.

If you have provided your consent, the WPO or the WP Team will provide you with updates on progress and the outcomes of your report, subject to any confidentiality constraints. These updates may be written or verbal, depending on what is appropriate in the circumstances.

If you have made a report anonymously, it is very important that you check back in on your report from time to time, as ANZ may have left messages for you in an attempt to update you on the investigation, or to let you know what further information is needed that may be critical to progressing the investigation.

Each report will have a unique identifier which will be provided to you so you can liaise with the WPO assigned to you in order to seek feedback on the status or outcome of your report.

If you are not satisfied that your report has been investigated and acted upon appropriately, you may contact the Chief Compliance Officer to request a review.

C. PROTECTION FROM DETRIMENTAL CONDUCT (PRINCIPLE 6)

ANZ will not tolerate any detriment that is inflicted on you because you or someone else has made a report, or due to someone suspecting that you or someone else might make a report, regardless of whether you have or are intending to do so. Examples of what may be considered detriment include:

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- a) retaliation, dismissal, suspension, demotion, or having your engagement with ANZ otherwise terminated;
- b) harassment, threats or intimidation;
- c) discrimination, subject to current or future bias, or derogatory treatment;
- d) injury in employment, and harm including psychological harm;
- e) damage or threats to your property, business, financial position or reputation; or
- f) revealing your Identity as a Whistleblower without your consent or contrary to law.

This protection applies to you regardless of whether any concerns raised in a report are found to be true, provided that you are acting honestly and ethically and made the report on reasonable grounds. This protection also applies to individuals conducting, assisting or participating in an investigation.

If someone at ANZ, including any supplier to ANZ, engages in detrimental conduct against you, please **immediately** contact your WPO, the Group Integrity Lead or the WP Team. This includes where you have felt you:

- are disadvantaged or have suffered detriment after making a report;
- are disadvantaged or have suffered detriment for participating in or assisting an investigation; or
- have any concerns regarding your safety for having made a report or in considering making a report.

Where the detrimental conduct against you involves the WPO, you should report the matter to the ANZ Chief Compliance Officer, or the Chair of the ANZ Audit Committee if the WPO is the Chief Compliance Officer.

It is very important that you report any such detriment immediately, as it will help ANZ better protect you to the extent possible. Reports of detrimental conduct will be treated confidentially. Anyone engaging in detrimental conduct may be subject to serious consequences, including disciplinary action and/or termination of engagements or contracts, as applicable. They may also be subject to legal consequences in the form of civil and criminal penalties. You may also be entitled to the following legal protections for making a report:

- protection from civil, criminal or administrative legal action;
- in some circumstances, protection from having to give evidence in legal proceedings; and or
- compensation or some other legal remedy if you have suffered detriment because of someone else's belief or suspicion that you have made a report.

For ANZ staff members, the **Employee Assistance Program (EAP)** also provides free, confidential, short term support services by qualified professionals to employees and their immediate family members either face to face, over the phone or over the internet to employees. The program consists of a number of distinct services which can be found here.

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VII. ROLES AND RESPONSIBILITIES

The following lists some details of the main responsibilities of some of the key positions and teams mentioned in this Policy and what you can expect from them throughout the process:

A. WHISTLEBLOWER PROGRAM TEAM (WP TEAM)

- Comprises of the Group Integrity Lead, Whistleblower Program Lead and Whistleblower Adviser(s) and forms part of the Group Integrity function at ANZ;
- Assist the WPO in the assessment and oversight of reports;
- Assist the WPO in the administration of this Policy;
- Provide advice and support to Other Eligible Recipients;
- Maintain a secure and restricted record of all reports made under this Policy;
- Report to ANZ's Operational Risk Executive Committee (OREC) and to the Audit Committee twice annually, and to the Chief Compliance Officer on reports made in the preceding period, including de-identified details of reports made and actions taken;
- Report to any boards and committees of the ANZ Group in a manner agreed between the Whistleblower Program and the relevant board from time to time;
- Arrange role-specific training as and when required; and
- Conduct an annual review of this Policy so that it remains effective.

B. WHISTLEBLOWER INVESTIGATORS (WI)

- Investigate reports in accordance with their appointment and this Policy;
- Maintain confidentiality of Identity and reports they are investigating;
- Immediately report concerns in relation to any detrimental conduct to the nominated WPO and the WP Team;
- Plan the investigation of matters relating to the report and report back to the WPO on proposed investigation approach before commencing, within 7 days of receiving briefing, together with any proposed strategy to stop, prevent or mitigate the reported misconduct;
- Take steps to protect or preserve evidence such as documents, materials and equipment;
- Gather documents, information and evidence relating to the report;
- Draw objective conclusions based on a fair assessment of the evidence gathered during the investigation;
- Keep comprehensive records of the investigation process;
- Make recommendations to the WPO about how to implement the strategy in relation to how reported misconduct can be stopped, prevented and or mitigated in future; and
- Report back to the WPO on progress of investigation every 14 days after initial 7 day update;
- Make recommendations to the WPO about any appropriate disciplinary actions or contractual actions with respect to any respondent(s);
- Comply with the directions of the WPO in relation to any further follow up, reporting action and requirements including the implementation of any recommendations; and
- Complete any training mandated by the WP Team.

C. WHISTLEBLOWER PROTECTION OFFICER (WPO)

- Receive reports and protect the interests of reporters;
- Determine whether the report falls within the scope of the Policy;
- Determine whether and how a report and should be investigated;

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- Appoint a WI where an investigation is deemed appropriate
- Ensure investigations are conducted in accordance with this Policy;
- Ensure reports are referred to the WP Team in accordance with this Policy;
- Ensure any reports involving a Director or the Chief Executive Officer of ANZ are reported to the Chair of ANZ's board;
- Ensure any reports involving a Director or the Chief Executive Officer (or Country Head) of a related entity in the ANZ Group are, if required, reported to the Chair or country equivalent of that entity's board;
- Update reporters on progress and details of outcomes to the fullest extent possible;
- Maintain confidentiality of Identity and reports received to the fullest extent possible;
- Immediately report concerns in relation to any detrimental conduct to the WP Team;
- Determine appropriate courses of action to remediate or act on the WI's investigation report in conjunction with other stakeholders, if appropriate;
- Make recommendations to prevent future instances of reportable misconduct;
- Complete any training mandated by the WP Team; and
- Seek to ensure the integrity of the Whistleblower Program is maintained.

D. OTHER ELIGIBLE RECIPIENTS (OER)

- Receive reports and obtain consent from the reporter where possible or relevant and refer report to the WP Team for assessment and, if appropriate, investigation;
- Maintain confidentiality about reports they receive in accordance with this Policy; and
- Immediately report any concerns in relation to any detrimental conduct to the nominated WPO and the WP Team; and
- Complete any training mandated by the WP Team

VIII. OTHER INFORMATION ABOUT THIS POLICY

A. BREACH OF THIS POLICY

A breach of this Policy must be immediately escalated to the Policy Owner, the ANZ Chief Compliance Officer, and is considered a breach of the ANZ Code of Conduct, and may have serious consequences including termination of employment, engagement or services, where appropriate. ANZ will apply the [Performance Improvement and Unacceptable Behaviour Policy](#) to employees in determining the consequences of the breach.

B. LEGAL OBLIGATIONS

If, in performing duties under or otherwise complying with this Policy, you identify a legal obligation that was inconsistent with this Policy, you must report this inconsistency to the Policy Owner.

C. EXEMPTIONS TO THIS POLICY

There are no exemptions to this Policy.

D. APPLICATION

All the companies within the ANZ Group, and everyone who works at or with the ANZ Group, including in the supply of goods and services to all of those companies, is bound by this Policy.

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Country Schedules

1 American Territories (Guam and American Samoa)

A. FURTHER REQUIREMENTS

In addition to the Policy, please note the following if you are reporting from Guam or American Samoa, or your concern or report relates to anyone or conduct connected to ANZ Guam Inc. (**ANZ Guam**), ANZ Amerika Samoa Bank, the ANZ branches in American Samoa, or the ANZ Group's business in those regions:

Part II (Principles), Principle 7 (Regulators)

A reminder that if you are reporting from the American Territories or your concern or report relates to the ANZ Group's business in that region, you are entitled to escalate your report to the financial regulator, **Federal Deposit Insurance Corporation (FDIC)**

Phone: 877-275-3342 | Email: <https://www.fdic.gov/about/contact/ask/> | Website: <https://ask.fdic.gov/FDICCustomerAssistanceForm/>

Part VII (Roles and Responsibilities)

C. Whistleblower Protection Officer (WPO)

In addition to the roles and responsibilities set out in the Policy, the WPO must also inform the Head of Compliance (**HoC**) and the Money Laundering Reporting Officer (**MLRO**) of ANZ Guam. Where a report is related to fraud, bribery, or corruption. The HoC and MLRO are responsible for official reporting to ANZ Guam Board of Directors and regulators as required.

E. Head of Compliance of ANZ Guam (HoC)

The HoC is responsible for consulting with the WPO in relation to appropriate measures and steps to be taken to address any misconduct identified in a report.

B. AMERICAN TERRITORIES POLICY ADMINISTRATION

The Board of ANZ Guam is committed to noting the body of the Policy and approving this American Territories Schedule to the Policy.

2 Cambodia

A. FURTHER REQUIREMENTS

In addition to the Policy, please note the following if you are reporting from Cambodia or your concern or report relates to anyone or conduct connected to the ANZ Group's business in Cambodia, or ANZ Royal (Cambodia) Bank (**ANZR**):

Part VII (Roles and Responsibilities)

C. Whistleblower Protection Officer (WPO)

In addition to the roles and responsibilities set out in the Policy, the WPO must also notify the Head of Compliance of ANZR (HoC), and the WPO will consult with the HoC on appropriate steps to be taken to address the misconduct that is the subject matter of the Report, subject to the confidentiality requirements of this Policy, the law and regulatory requirements in Cambodia.

E. Head of Compliance of ANZR (HoC)

The HoC must inform the independent board member in charge of ANZR of the subject matter of all Reports that have been notified to the HoC by a WPO. The HoC is responsible for consulting with the WPO in relation to appropriate steps to be taken to address the misconduct identified in the Report and to notify the independent board member of any such steps taken to address the misconduct.

3 Fiji

A. FURTHER REQUIREMENTS

In addition to the Policy, please note the following if you are reporting from Fiji, or your concern or report relates to anyone or conduct connected to the ANZ Group's business in Fiji:

Part II (Principles), Principle 7 (Regulators)

A reminder that you are entitled to escalate your report or raise your concern directly to the financial regulator at any time, **Reserve Bank of Fiji (RBF)**:

Phone: (679) 331 3611 | Email: info@rbf.gov.fj | Website: <https://www.rbf.gov.fj/Contact-Us-Feedback>

B. FIJI POLICY ADMINISTRATION

Copies of this Policy and any revisions will be submitted to the RBF within 30 days after the changes have been approved by the ANZ Board.

4 France

A. FURTHER REQUIREMENTS

In addition to the Policy, please note the following if you are reporting from France or your concern or report relates to anyone or conduct connected to the ANZ Group's business in France (**ANZ France**):

Part II (Principles), Principle 7 (Regulators)

A reminder that you are entitled to raise your concerns and make a report directly to the French banking regulator at any time regardless of whether you have already made a report under this Policy:

Autorité de Contrôle Prudentiel et de Résolution (ACPR)

Email: 2780-SIGNALEMENTS-UT@acpr.banque-france.fr

Post: Secrétariat général de l'Autorité de contrôle prudentiel et de résolution
SAIDP - Signalements
75436 PARIS CEDEX 09

It is recommended you seek independent legal advice (at your own cost) before reporting any concern to an external body such as ACPR.

Part III (Scope) Section A (Can I Make a Report Under this Policy?)

In addition to the examples of misconduct provided in the Policy, in France, other examples of misconduct you may wish to report on can include potential or actual breaches of the:

- a) European regulations;
- b) French Insurance Code;
- c) French Mutual Insurance Code;
- d) French Social Security Code; or
- e) French Monetary and Financial Codes.

However, the list is not intended to be exhaustive. Please report any concern that you believe constitutes misconduct.

Part V (What if My Concerns Relate to Conduct, People, or Operations Outside of Australia?)

Please be aware that reports made from France via the whistleblowing channel are subject to French law and the guidelines of the data protection authority, Commission Nationale de l'informatique et des Libertés (**CNIL**) guidelines, and must comply with the following requirements:

- a) You must use the whistleblowing channel in a disinterested (unbiased) manner;
- b) The whistleblowing channel must be used in good faith. Consequently, a malicious report may result in disciplinary action and civil and/or criminal prosecution. Conversely, the mere fact that a concern reported proves to be unfounded, inaccurate or is not further processed or investigated, will not expose the whistleblower to such action if the report has been submitted in good faith.

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- c) Further to Principle 3 set out in Part II of the Policy (ANZ's Expectations Of You), whereby ANZ expects you to act honestly and ethically and make a report on reasonable grounds, in France, there are further requirements that dictate what types of reports will be considered. These are reports that, if possible, have objectivity in the reported events.
- d) No one will face any consequences for not using the whistleblowing channel.
- e) While anonymous reporting is generally not encouraged in France, the CNIL recommends that an anonymous report can be dealt with under the following conditions:
 - i the seriousness of the facts is established; and
 - ii the report is sufficiently documented.

If these conditions are met, your report will be handled with special precautions under French law.

If an anonymous report is found to be malicious, this may result in disciplinary action and prosecution as per item 2 listed above.

Notwithstanding the fact that anonymous reporting may not be allowed in your specific case, your identity will of course be processed and kept confidential by the individuals specifically in charge of receiving and investigating the reports within ANZ and its provider as set out in the Policy. Those individuals are limited in number, specifically trained to receive and investigate those reports, and subject to strong contractual confidentiality obligations.

- f) In any case, your identity as a whistleblower will not be disclosed without your consent, except to a judicial authority.

The same confidentiality obligations apply to the identity of any other the individuals concerned by a report, which will not be disclosed, except to the judicial authority once the alert is established.

Note however that Deloitte, in its capacity as data processor and service provider managing a whistleblowing channel for ANZ, will have access to the identity of the whistleblower and of the other individuals concerned by a report, to the extent necessary to carry out its work in relation to the management of the whistleblowing channel and in accordance with its confidentiality obligations.

Your Personal Data

For further information in relation to how your personal data will be handled, please contact ANZ's Data Protection Representative:

- By email : gdpereurope@anz.com
- By telephone: +44 (0) 203 229 2595
- By post: ANZ Bank, 40 Bank Street, London E14 SEJ

B. FRANCE POLICY ADMINISTRATION

The ANZ Paris branch will submit this Policy to the ACPR as part of its Internal Control Report on an annual basis.

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5 Germany

A. FURTHER REQUIREMENTS

In addition to the Policy, please note the following if you are reporting from Germany or your concern or report relates to anyone or conduct connected to the ANZ Group's business or branch in Germany (**ANZ Germany**):

Part II (Principles), Principle 7 (Regulators)

A reminder you are entitled to escalate your report to the German banking regulator, **Federal Financial Supervisory Authority (BaFin)** directly at any time:

Phone: +49 (0) 22 84 10 82 355

Email: https://www.bafin.de/SharedDocs/Kontakt Daten/EN/BaFin/Kontakt/kontakt_baf_in_hinweisgeberstelle_en.html?nn=8119390

Post: Bundesanstalt für Finanzdienstleistungsaufsicht

Hinweisgeberstelle

Graurheindorfer Straße 108

53117 Bonn

By electronic whistleblowing system: <https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=2BaF6&language=eng>

Part VI (I Have Made A Report Under This Policy. What Next?), Section B (Confidentiality and Consent)

In addition to the process set out in the Policy after you have made a report, if you are reporting from Germany, you will receive an acknowledgement of receipt of the report within seven days.

Your Personal Data

For further information in relation to how your personal data will be handled, please contact ANZ's Data Protection Representative:

- By email : gdp europe@anz.com
- By telephone: +44 (0) 203 229 2595
- By post: ANZ Bank, 40 Bank Street, London E14 SEJ

6 Hong Kong (HK)

A. FURTHER REQUIREMENTS

In addition to the Policy, please note the following if you are reporting from Hong Kong, or your concern or report relates to anyone or conduct connected to the ANZ Group's business in HK:

Part VII (Roles and Responsibilities)

C. Whistleblower Protection Officer (WPO)

In addition to the roles and responsibilities set out in the Policy:

- Where a report relates to theft, forgery, corruption or other illegal activity, the WPO must contact the HK Compliance team (to the extent permitted by law); and the HK Compliance team will work with the WPO to determine if the matter needs to be reported to the HK regulator, the Hong Kong Monetary Authority (**HKMA**); and
- Where a report contains allegations in relation to suspected external or internal fraud, and or where an investigation confirms or suspects external or internal fraud, that could lead to material potential financial loss to ANZ, its customers, or have significant impact on ANZ's reputation, the WPO must notify the HK Compliance Head immediately (to the extent permitted by law), who may in turn be required to notify the HKMA on the same day.

7 New Zealand

A. FURTHER REQUIREMENTS

In addition to the Policy, please note the following if you are reporting from New Zealand or your concern or report relates to anyone or conduct connected to the ANZ Group's business in New Zealand i.e. ANZ Bank New Zealand Limited (**ANZ NZ**); ANZ New Zealand Investments Limited; ANZ Investments Services (New Zealand) Limited; or UDC Finance Limited, (together, the **ANZ NZ Group**):

Part II (Principles), Principle 7 (Regulators)

A reminder that if you are reporting from New Zealand or your concern or report relates to the ANZ NZ Group, you are entitled to escalate your report to the following regulators:

a) **Reserve Bank of New Zealand**

Phone: +64 4 472 2029 | Email: rbnz-info@rbnz.govt.nz | Write: PO Box 2498, Wellington 6140, New Zealand

b) **Financial Markets Authority**

Phone: 0800 434 567, +64 4 472 9830 | Email: questions@fma.govt.nz | Write: PO Box 1179, Wellington 6140.

In some circumstances, you may also escalate your report to the New Zealand Ombudsman. Please see: <http://www.ombudsman.parliament.nz/what-we-do/protecting-your-rights/protected-disclosures-whistle-blowing>

Part III (Scope) Section A (Can I Make a Report Under this Policy?)

The Policy contains examples of what might constitute types of misconduct that you can report on. This list is not intended to be exhaustive and there may be other examples. For example in New Zealand, other types of misconduct could include any acts, omissions, or courses of conduct that are or could be:

1. a serious risk to public health, public safety or the environment; or
2. a serious risk to the maintenance of New Zealand law, including the prevention, investigation, and detection of offences and the right to a fair trial.

Part III (Scope) Section B (Excluded Matters)

Exclusion: Customer complaints

If you are a customer and are concerned with the way that ANZ NZ or any company within the ANZ NZ Group has handled any matter, product, or service, including an existing complaint, please contact ANZ NZ: https://help.anz.co.nz/app/answers/detail/a_id/117/~/_/lodge-a-complaint

Part VI (I Have Made A Report Under This Policy. What Next?) Section C (Protection from Detrimental Conduct)

In addition to the protections outlined in the Policy, if you are an employee of the ANZ business to which a report relates, and you voluntarily provide supporting information in relation to that report so that the serious misconduct can be investigated, both the information and your identity will be protected under this Policy. Voluntarily providing

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information does not include where you have been compelled to do so by ANZ NZ or the ANZ Group, law or otherwise.

Part VII (Roles and Responsibilities) Section A (Whistleblower Program Team)

The manner of reporting for ANZ NZ is

1. a report for each meeting of the Conduct and Culture Committee of the Board of ANZ NZ, or as otherwise requested by the Board of ANZ NZ regarding reports made in relation to the ANZ NZ Group. The report must respect the requested level of confidentiality of the whistleblowers, and Australian law, but will contain:
 - a) number of Reports;
 - b) channels used;
 - c) themes of the content of the Reports; and
 - d) general details about resolution or outcome of Reports, where appropriate; and
2. a report to each meeting of the Executive Conduct and Committee for ANZ, or as otherwise requested by the Board of ANZ, on reports made in the preceding period, including de-identified details of reports made and actions taken.

B. NEW ZEALAND POLICY ADMINISTRATION

The Board of ANZ NZ is committed to noting the body of the Policy and approving this New Zealand Schedule to the Policy.

8 Papua New Guinea (PNG)

A. FURTHER REQUIREMENTS

In addition to the Policy, please note the following if you are reporting from PNG, or your concern or report relates to anyone or conduct connected to Australia and New Zealand Banking Group (PNG) Limited (**ANZPNG**):

Part II (Principles), Principle 7 (Regulators)

A reminder you are entitled to escalate your report to the financial regulator directly at any time regarding your concern: **Bank of Papua New Guinea (BPNG)**

Phone: +675 322 7200 | Fax: +675 321 1617 | Write: PO Box 121, Port Moresby 111, National Capital District, Papua New Guinea | Website (online contact form): <https://www.bankpng.gov.pg/about-us/contact-us/>

Part VII (Roles and Responsibilities)

C. Whistleblower Protection Officer (WPO)

In addition to the roles and responsibilities set out in the Policy, the WPO must inform the Chair, the Chair of the Audit Committee or Audit and Risk Committee. The Chair (or such other appropriate person) must report to the BPNG any matter where:

- a) there are serious prudential concerns; or
- b) where the illegal, unethical or questionable practices related to the Chair or senior staff.

B. PNG POLICY ADMINISTRATION

The Board of ANZPNG is committed to noting the body of the Policy and approving THIS PNG Schedule to the Policy.

9 Singapore

A. FURTHER REQUIREMENTS

In addition to the Policy, please note the following if you are reporting from Singapore or your concern or report relates to anyone or conduct connected to the ANZ Group's business in Singapore:

Part VI (I Have Made A Report Under This Policy. What Next?)

You should know that in addition to the confidentiality and consent processes set out in the Policy, ANZ is required to comply with certain requirements, known as the Banking Secrecy Requirements, in Singapore. The WPO assigned to your matter will handle the information as set out below.

Part VII (Roles and Responsibilities)

C. Whistleblower Protection Officer (WPO)

In addition to the roles and responsibilities of the WPO set out in the Policy, where ANZ would need to disclose any customer data or employee data to third parties for the purposes of managing or investigating a report (for example, ANZ being required to disclose such information for the purposes of obtaining legal advice or otherwise required by a regulator), WPO will consult with ANZ's Singapore Compliance and Legal teams with respect to such proposed disclosure to ensure that any requirements by the Monetary Authority Singapore (**MAS**) and/or any other regulator are met.

10 United Kingdom

A. FURTHER REQUIREMENTS

In addition to the Policy, please note the following if you are reporting from the United Kingdom (**UK**) or your concern or report relates to anyone or conduct connected to the ANZ Group's business in the UK (**ANZ UK**).

Part II (Principles), Principle 7 (Regulators)

You are entitled to escalate your report to the following regulators directly at any time provided the concern or report constitutes a 'Reportable Concern' (as defined below):

a) **Financial Conduct Authority (FCA)**

Ph: +44 (0)20 7066 9200 | Email: whistle@fca.org.uk | Write: Intelligence Department (Ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN.

b) **Prudential Regulation Authority (PRA)**

Ph: +44 (0)203 461 8703 | Email: PRAwhistleblowing@bankofengland.co.uk | Write: Confidential Reporting (Whistleblowing), PRA CSS, 20 Moorgate, London, EC2R 6DA.

A Reportable Concern is:

- a) anything that would be a "UK Protected Disclosure", which is a disclosure made on reasonable grounds and on the basis that the person making the disclosure believes it to be substantially true, it is in the public interest, and contains information that one or more of the following has been, is being, or is likely to be, committed:
- i a criminal offence;
 - ii a failure to comply with any legal obligation;
 - iii a miscarriage of justice;
 - iv the putting of the health and safety of an individual in danger;
 - v damage to the environment; or
 - vi deliberate concealment relating to any of (i) to (v); or
- b) anything that is a breach of ANZ's policies and procedures; and
- c) behaviour that harms or is likely to harm the reputation or financial well-being of ANZ.

A reportable concern can relate to a matter that occurred, occurs or would occur in the UK or another country.

Part IV (Roles and Responsibilities)

In addition to the responsibilities set out for the WPO in the Policy, the WPO has the following additional responsibilities with respect to disclosures arising from or in relation to the ANZ Group's business in the UK:

C. Whistleblower Protection Officer (WPO)

- report at least annually to the ANZ London Branch Executive Committee where a Report has been made by an UK-based employee or contingent Worker; and

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- ensure ANZ London Branch reports to the FCA about each case brought by a UK-based Employee that was contested but lost before an employment tribunal where the claimant successfully based all or part of their claim on detriment suffered as a result of making a Protected Disclosure (UK).

In addition to the Roles and Responsibilities in the Policy, there is also the following role applicable in the ANZ London branch:

E. Whistleblower Champion (UK)

The Whistleblower Champion for the ANZ London branch is a registered as a Senior Manager in under UK regulation and has the following roles and responsibilities:

- ensuring and overseeing the integrity, independence and effectiveness of the whistleblowing policy applicable to the ANZ London Branch;
- where appropriate, ensuring that the Group Integrity Lead reports at least annually to the governing body of ANZ London Branch (ANZ London Branch Executive Committee) where a report has been made by a UK based employee or contingent worker, if appropriate; and
- ensuring that ANZ London Branch reports to the FCA about each case brought by a UK based Employee that was contested but lost before an employment tribunal where the claimant successfully based all or part of their claim on detriment suffered as a result of making a UK Protected Disclosure.

While the Whistleblower Champion does not need to have to have a day-to-day operational role in handling disclosures from whistleblowers or commencing investigations, he or she must have a level of independence and access to independent legal advice and sufficient information to carry out their responsibilities.

Your Personal Data

For further information in relation to how your personal data will be handled, please contact ANZ's Data Protection Representative:

- By email : gdpereurope@anz.com
- By telephone: +44 (0) 203 229 2595
- By post: ANZ Bank, 40 Bank Street, London E14 SEJ

E. UK POLICY ADMINISTRATION

Internal Approval Body	The Whistleblower Champion for ANZBGL London Branch (for oversight of preparation of the UK Annual Whistleblowing Report).
External Approval Body	ANZBGL London Branch is required to prepare a Whistleblowing activity report (UK Annual Whistleblowing Report) to the ANZBGL Board which must also be made available to the FCA or PRA on request, but not made public.

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11 United States (U.S.)

A. FURTHER REQUIREMENTS

In addition to the Policy, please note the following if you are reporting from the U.S. or your concern or report relates to anyone or conduct connected to the ANZ Group's business or branch in the U.S.

Employees located in ANZ's New York office have whistleblower and anti-retaliation protections under a number of U.S. federal, state and local laws (**U.S. Whistleblower Laws**), including laws that relate specifically to securities and financial services organizations.

Part II (Principles), Principle 7 (Regulators)

A reminder that if you are reporting from the U.S. or your concern or report relates to the ANZ Group's business or branch in the U.S., you are entitled to escalate your report to the following regulators directly at any time (this includes cooperating with, responding to any inquiry from or providing testimony to any regulatory or investigatory agency or authority), and you are entitled to remain anonymous in doing so:

- a) **Financial Industry Regulatory Authority (FINRA) Office of the Whistleblower**
Phone: 1-866-96-FINRA (1-866-963-4672) | Website: www.finra.org/whistleblower
- b) **United States Department of Labor: Occupational Safety and Health Administration (OSHA)**
Phone: 1-800-321-OSHA (6742) | Website: <https://www.osha.gov/whistleblower/WBComplaint.html>
- c) **United States Securities and Exchange Commission (SEC) Office of the Whistleblower**
Phone: (202) 551-4790 | Website: <https://www.sec.gov/whistleblower/submit-a-tip>
- d) **New York State Department of Labor**
Phone: (888) 581-5812 | Website: <https://labor.ny.gov/ui/claimantinfo/ContactInfo.shtm>
- e) **U.S. Commodity Futures Trading Commission**
Phone: (866) 873-5675 | Website: <https://www.whistleblower.gov/overview/submitatip/>

Part III (Scope), Section A (Can I Make A Report Under This Policy?)

There may be additional persons who may be a whistleblower under the U.S. Whistleblower Laws. Please contact FINRA for further information.

Part III (Scope), Section B (Excluded Matters)

Exclusion 2: Personal Work Related Grievances

There are also a number of U.S. Whistleblower Laws related to your personal-work related grievances that are covered in separate policies. To the extent that there are any inconsistencies between this Policy, and the U.S. Whistleblower Laws, the U.S. Whistleblower Laws will apply, as stated in Principle 1 of this Policy.

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Part VI (I Have Made A Report Under This Policy. What Next?), Section C (Protection from Detrimental Conduct)

The U.S. Whistleblower Laws recognise that retaliation is one of the primary risks associated with whistleblowing. In addition to ANZ's prohibition on detrimental conduct which includes retaliation (in any form, including among others, demotion, discharge, suspension or harassment against any staff who makes a report internally or externally), there may be further protections provided to the whistleblower under the U.S. Whistleblower Laws.

Under U.S. law, you have a private right of action if you feel you have suffered retaliation because of any lawful act of making a whistleblower report. You may contact the applicable agency directly under your Legally Protected Communication rights (see below).

a) **Legally-Protected Communications**

In general, no offer letter, employment, severance, arbitration (in certain cases), confidentiality or other agreement may prevent, restrict, limit, impede or otherwise interfere with your rights to:

- engage in legally-protected employee communications, including without limitation protections under Section 7 of the U.S. National Labor Relations Act;
- file a charge or complaint or initiate an investigation with the applicable government agency;
- report a possible violation of any law to a government agency;
- make other disclosures that are protected under U.S. Whistleblower Laws, including for example, to the extent applicable, reporting possible violations of law in accordance with Section 21F of the U.S. Securities Exchange Act of 1934 and related rules;
- respond to a lawful subpoena;
- comply with any other legal obligation;
- communicate with any government agency or otherwise participate in any investigation or proceeding that may be conducted by any government agency, including providing documents or other information, without notice to or permission by ANZ; or
- receive any award for information provided to any government agency.

b) **Protections under the Sarbanes Oxley Act of 2002 (SOX)**

SOX provides certain legal protection to covered whistleblowers. The following disclosure applies to companies subject to SOX and their officers and employees:

- SOX Section 806 contains the first federally-imposed, broad-based whistleblower protection. Any company with securities registered under Section 12 of the Securities Exchange Act is subject to civil penalties if an employee is discharged, demoted, suspended, threatened, harassed or otherwise discriminated against because such employee provided information, caused information to be provided or otherwise assisted with an investigation related to fraudulent acts. SOX Section 1107 provides criminal penalties of up to 10 years imprisonment plus a fine for any retaliation resulting from the cooperation with a law enforcement officer for providing truthful information relating to the commission or possible commission of any federal offense.
- In addition, vendors, suppliers and agents cannot discharge, demote, suspend, threaten, harass, or in any other manner discriminate or retaliate against employees who provide information in investigations – including internal investigations – into certain types of violations of the securities laws and regulations, or who file proceedings relating to similar violations. Also, under SOX Section 1107, any person who knowingly, with the intent to retaliate, takes any action harmful to any person, including interference with the lawful

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employment or livelihood of any person, for providing a law enforcement officer any truthful information relating to the commission or possible commission of any federal offense, may be fined under such title or imprisoned not more than 10 years, or both.

B. U.S. POLICY ADMINISTRATION

This Policy has been reviewed and approved by ANZ, and this U.S. Country Schedule has been reviewed and approved by ANZSI's Supervisory Management Group and ANZSI Chief Compliance Officer and will be periodically reviewed and approved thereafter. ANZ's independent auditors will make a quarterly report to the appropriate ANZSI committee of:

- (1) the number of disclosures made;
- (2) the number of investigations commenced in response to disclosures;
- (3) the number of wrongdoings discovered; and
- (4) all disciplinary actions taken in response to matters discovered through disclosures.

This policy will be reviewed periodically by the ANZSI committee after consultation with the senior compliance officer, taking into account the effectiveness of the policy in promoting reports, but with a view to minimizing the opportunities to cause improper investigations.

U.S. Annexure Owner	ANZSI Chief Compliance Officer
Related policies	ANZ Whistleblower Policy
Supporting guidelines to U.S. Annexure	FINRA Rule 13201 Section 11(c) of the OSH Act Section 748 and 922 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. SEC Rule 21F-2(b)(1)(iii) Section 740 of the New York Labor Law The Freedom of Information Act –FOIA Sections 806 & 1107 of Sarbanes-Oxley Act - SOX Section 23 Commodity Futures Trading Commission – CFTC Section 7 of the U.S. National Labor Relations Act
Review and Approval Body	ANZSI Supervisory Management Group

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