



OUR CODE OF CONDUCT



ANZ's Purpose is to shape a world where people and communities thrive. Our people and communities expect us to do the right thing and to exercise good judgement. Our Code of Conduct describes how we work at ANZ and sets expected standards of behaviour consistent with our Purpose. The Code supports our Values of Integrity, Collaboration, Accountability, Respect and Excellence and helps us to make fair, balanced and ethical decisions in our day-to-day work. It is important to understand our Code in letter and spirit. The Code applies to all employees, contractors and consultants working for the ANZ Group.

Code guiding principle

This means that we...

WE ARE ETHICAL AND PROFESSIONAL

- Are trustworthy and create confidence and goodwill with customers
- Always put the interests and needs of customers first when providing advice on products and services
- Undertake our duties with care and diligence and always consider the risks to our customers, communities and ANZ.
- Help protect ANZ, its customers and our community against financial crimes including fraud, tax evasion, money laundering, terrorist financing or breaches of economic sanctions
- Never engage in anticompetitive conduct
- Behave professionally and appropriately at work and work-related functions
- Only provide advice to customers that we are qualified and authorised to provide
- Never engage in conduct (including outside of work) that may cause damage to ANZ's reputation or is incompatible with our employment at ANZ. This includes communications or statements on social media or in other forums

WE ACT WITH INTEGRITY

- Are honest and transparent in our dealings with others
- Never act illegally or conceal breaches of the law or our Code (or help anyone else to do so)
- Use ANZ technology, systems, assets, information and funds appropriately and for approved purposes
- Ensure any expenditure is allowable and reasonable (and if you are a people leader ensure that you appropriately monitor the discretionary expenses of your team)

WE TREAT ALL PEOPLE WITH DIGNITY AND RESPECT

- Treat customers, colleagues, suppliers and other stakeholders with respect and dignity
- Value diversity and difference and never harass, bully or unlawfully discriminate
- Make employment decisions based on merit
- Create a safe working environment. If we see something – we do something



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Code guiding principle

This means that we...

WE MANAGE CONFLICTS OF INTEREST

- Don't make or receive improper payments, benefits or gains
- Never do anything that puts, or appears to put, a personal interest before those of customers or ANZ
- Never view, maintain or perform transactions on our own accounts or those of friends or relatives
- Disclose relationships, or associations with customers, suppliers or other parties (including colleagues) that might give rise to a conflict of interest
- Obtain approval for and record all donations, sponsorships, or financial contributions
- Only accept gifts, reward or entertainment in line with ANZ policy
- Never trade in securities with inside information, or pass such information to others
- Seek approval for any non-ANZ work (paid or unpaid), business interest or directorship

WE PROTECT PRIVACY AND CONFIDENTIALITY

- Only collect, access, use and disclose confidential or personal information for legitimate business purposes, where authorised, or as required by law
- Don't access or view any customer accounts unless it is necessary for legitimate business purposes
- Only provide confidential or personal information to other employees where it is required for work purposes
- Never allow others to log on to ANZ systems using our personal credentials
- Always follow ANZ's information handling and security procedures

WE COMPLY WITH OUR CODE, THE LAW AND ANZ POLICIES AND PROCEDURES

- Know and comply with all laws, policies (including policy requirements and standards) and procedures that apply to our roles
- Complete all mandatory training as directed by ANZ
- Seek guidance if unsure whether or how a particular law, policy or procedure applies
- Immediately disclose any criminal charges or convictions to line management

WE CALL OUT UNACCEPTABLE BEHAVIOUR AND STAND UP FOR WHAT IS RIGHT

- Immediately report any unacceptable, dishonest or unethical behaviour by others (including colleagues, customers or suppliers)
- Make sure people feel safe to speak up, encourage them to do so and don't victimise anyone who does
- Report suspected breaches and concerns to your people leader, People Assist, Operational Risk and Compliance or to the Whistleblower Program (contact details are in the Whistleblower Policy). If we see something – we say something



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Our Code does not anticipate every situation. If unsure, ask yourself – is this aligned with our Purpose and Values? Is it legal? Is it ethical? Use the following ‘**Conduct Sense-Check**’ questions to assist with the thinking behind your everyday decisions and actions.

You may also use ANZ’s [Ethical Decision Making Framework](#) to help guide your decisions, especially if you are facing a complex situation.

CAN YOU ANSWER ‘YES’ TO ALL OF THE BELOW...?

Would I be comfortable speaking publicly about this?

Am I being clear and authentic?

Will the consequences of my actions drive a fair customer outcome?

Am I complying with ANZ’s policies and procedures?



NO/NOT SURE

If you’ve answered ‘**No/Not Sure**’ to one or more of these questions, seek advice from:

- Your People Leader
- People Assist
- Legal
- Operational Risk and/or Compliance
- Whistleblower Program



YES

If you’ve answered **Yes** to all of the questions, then it’s likely that you are aligned to ANZ’s Code of Conduct, Purpose and Values.

How are breaches dealt with? Reported breaches of the Code will be investigated and if substantiated will result in action being taken, which can include formal warnings or termination of employment. No one wants to see that happen, so please treat our Code seriously.



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MORE INFORMATION ABOUT SOME OF YOUR KEY OBLIGATIONS CAN BE FOUND IN THE FOLLOWING POLICIES:

ALL STAFF POLICIES

- [Conflict of Interest Policy](#)
- [Customer Tax Transparency Policy](#)
- [Equal Opportunity, Bullying and Harassment Policy](#)
- [Expense Policy](#)
- [Trading in ANZ Securities Policy](#)
- [Trading in Non-ANZ Securities Policy](#)
- [Use of Systems, Equipment and Information Policy](#)
- [Wellbeing and Safety Policy](#)
- [Whistleblower Policy](#)

ANZ STAFF POLICIES

- [Anti-Bribery and Anti-Corruption Policy](#)
- [Anti-Money Laundering and Counter-Terrorism Financing Policy](#)
- [Sanctions Policy](#)
- [Competition Policy](#)
- [Data Management Policy](#)
- [Fraud Policy](#)
- [Information Security Policy](#)
- [Privacy Policy](#)

SUNCORP BANK STAFF POLICIES AND STANDARDS

- [Anti-Bribery and Corruption Policy](#)
- [Anti-Money Laundering, Counter-Terrorism Financing and Sanctions Policy](#)
- [Competition Risk Policy](#)
- [Data Governance Standard](#)
- [Anti-Fraud Policy](#)
- [Security Management Policy](#)
- [Privacy Management Policy](#)

IF YOU ARE A PEOPLE LEADER OR MANAGE, SUPERVISE OR DIRECT THE WORK OF OTHERS, WE ALSO EXPECT THAT YOU:

- **Lead in accordance with ANZ's purpose** and our behaviours
- **Role model** the behaviour we expect under the Code and our Values
- **Set clear expectations** for your team about the standards of behaviour required under the Code and the potential consequences of unacceptable behaviour
- **Are accountable** for ensuring that the actions and decisions of your team are consistent with the Code and ANZ's Values
- **Promote speaking up** and ensure that your people feel safe to raise any issues or concerns
- **Identify any breaches of the Code** and address these in accordance with ANZ policies and processes