



Fraud Policy Summary

Why does ANZ have this policy?

Fraud is the intentional act by one or more individuals, involving the use of deception to obtain an unjust or illegal advantage, and may arise from internal or external sources.

The purpose of this policy is to set out ANZ's approach to proactively minimise the occurrence of fraud and its consequences to our customers, shareholders and employees and to meet legal and regulatory requirements.

This is one of the global policies supporting ANZ's Code of Conduct and Ethics.

How does this policy apply at ANZ?

This policy applies to all employees and contractors of Australia and New Zealand Banking Group Limited (ANZ BGL) and its controlled entities.

The implementation of this policy is supported by global procedures, and all employees and contractors complete mandatory training, repeated every year.

Failure to comply with this policy may lead to disciplinary action, including dismissal, as well as criminal, civil or regulatory liability.

Key obligations

Under this policy ANZ will:

- continue to develop and implement preventive and detective systems, controls, frameworks and demonstrate a proactive approach to fraud risk management to protect its customers, shareholders and employees against the risks of fraud
- identify, assess, document and escalate fraud risks associated with all activities, including products, processes and delivery channels
- identify, assess and document fraud related obligations and key fraud controls used to meet these obligations
- continue to develop and maintain minimum investigation thresholds for all incidents
- report internally and externally (as required) all incidents that are suspected and or above the agreed threshold.
- refer internal fraud matters to the police.

Under this policy employees and contractors will:

- act with honesty and integrity
- understand the relevant fraud risks, both internal and external, within their area and be alert to any fraudulent activity
- complete all fraud awareness training requirements for their business area including those contained within ANZ Essentials.

Last reviewed: January 2020

Reviewed annually by: Financial Crime Portfolio