

TAX GOVERNANCE POLICY SUMMARY

WHY DOES ANZ HAVE THIS POLICY?

The purpose of this policy is to guide the way in which ANZ manages its global tax obligations. Our approach requires that we:

- conduct our tax affairs in a manner consistent with a low risk appetite,
- have regard for financial and reputational risk; and
- maintain open, co-operative and transparent relationships with Revenue Authorities wherever we operate.

HOW DOES THIS POLICY APPLY AT ANZ?

This policy applies to all employees and contractors of Australia and New Zealand Banking Group Limited and its controlled entities, including when acting at the Group's direction as a director or in any other capacity.

Tax compliance is a fundamental part of the culture and business practices of ANZ and its controlled entities. Policies, procedures and programs have been implemented as part of the tax governance framework to comply with the tax laws in all the countries where we operate.

KEY OBLIGATIONS

Under this policy:

- ANZ's tax affairs must be managed in accordance with the Group's low risk appetite.
- ANZ's tax obligations must always be managed, not only in compliance with the letter of the law, but also in accordance with our understanding of the policy intent of the law in a manner that builds community trust.
- Transactions should exhibit clear commercial outcomes and attributes without reliance on their tax effect for their commercial viability.
- ANZ will not be party to tax based structured financing arrangements involving customers, or any other arrangements that are inconsistent with approved strategic plans or Group initiatives. ANZ employees and contractors are only permitted to communicate with Revenue Authorities on behalf of ANZ if authorised to do so and in a manner which is consistent with ANZ's clearly defined engagement model.
- ANZ maintains a comprehensive approach for monitoring and reporting global tax risks to the Board Audit Committee and the key controls in place for managing them.
- ANZ undertakes periodic internal tax control testing and reports this to the Board Audit Committee.

ROLE OF THE BOARD AUDIT COMMITTEE

The Board Audit Committee is the owner of the Tax Governance Policy and communicates clear expectations regarding tax risk appetite. Board Audit Committee ensures that there is a framework in place to keep them informed about tax risk matters, the effectiveness of the tax control framework and whether tax paid aligns with business results.

A NOTE ON TRANSFER PRICING

ANZ has implemented a separate global policy in respect of its transfer pricing international related party dealings. The Group General Manager Taxation is the owner of the Tax Transfer Pricing Governance Policy.

ANZ does not use transfer pricing as a means to shift income, costs or profits to/from tax-preferred countries, and "tax havens" are not used for tax avoidance purposes but only for legitimate funding and liquidity purposes.

MATTERS SPECIFIC TO UNITED KINGDOM (UK) TAXATION

- ANZ has adopted, and complies with, the UK Code of Practice on Taxation for Banks.
- ANZ regards the publication of this strategy as complying with the duty under paragraph 16(2) of the Finance Act 2016 in respect of UK taxation for the year ended 30 September 2019.

Last review: October 2019

Reviewed annually by: Group Tax