

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.

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. Any changes to the Tax Governance Policy are approved by the Board Audit Committee.

HOW DOES THIS POLICY APPLY AT ANZ?

The Board Audit Committee administers its responsibility via the Group Chief Financial Officer, who has ultimate responsibility for ANZ's tax matters. Day-to-day responsibility is delegated to the Group General Manager Taxation. The ANZ tax function reports to the Group General Manager Taxation and their activities are also overseen by the Group Chief Financial Officer.

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 prevailing 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 is committed not to use tax structures without commercial substance.
- 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 maintains a comprehensive approach for monitoring and reporting global

significant tax risks to the Board Audit Committee and the key controls in place for managing them.

- ANZ retains qualified, experienced and well-resourced tax professionals to manage and oversee the tax control framework and the day-to-day tax affairs of the Group.
- External tax advice is sought for material, uncertain or complex issues or transactions, to minimise tax risks and ensures accuracy in our tax reporting obligations.
- ANZ undertakes periodic internal tax control testing and reports this to the Board Audit Committee.
- Specified products, transactions and events which require tax notification and endorsement, are subject to a robust review and approval process. ANZ does not give any tax advice to customers and does not promote tax avoidance products to its customers.
- Escalation procedures for material tax issues are pivotal which ensures that significant tax risks are reported to the Board Audit Committee.
- ANZ maintains robust accounting systems and strong internal controls to support our tax compliance and reporting obligations.

A NOTE ON TRANSFER PRICING

ANZ has implemented a separate global policy in respect of its transfer pricing international related party dealings, which is in compliance with the Organisation for Economic Co-operation and Development (OECD) guidelines and arm's length principles. 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.

RELATIONSHIP WITH THE REVENUE AUTHORITIES

ANZ aims to maintain an open, co-operative and transparent relationship with Revenue Authorities, which includes:

- Proactively engaging with the Revenue Authorities, keeping them informed of business activities and key development, to disclose significant, uncertain or complex matters.
- Providing information to their questions and enquiries in a timely manner.
- Working openly and collaboratively to resolve issues or disputes.

MATTERS SPECIFIC TO UNITED KINGDOM (UK) TAXATION

- ANZ has adopted and complies with the UK Code of Practice on Taxation for Banks.
- ANZ has zero tolerance for any activity relating to the criminal offence of tax evasion and we are committed to preventing the facilitation of tax evasion, in accordance with Part 3 of the Criminal Finances Act 2017.
- 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 2022.

Last review: May 2022

Reviewed annually by: Group Tax