

ANZ GLOBAL REPORTING INITIATIVE 2010

The Global Reporting Initiative (GRI) provides a generally accepted framework for reporting on an organisation's economic, environmental and social performance. ANZ has used the GRI Sustainability Reporting Guidelines (G3) in the development of our corporate responsibility annual reports.

This index provides a comprehensive listing of the GRI indicators reported by ANZ. This index refers to information in our 2010 Shareholder and Corporate Responsibility report, ANZ's Annual Financial Review, as well as publicly available information such as that on our website, anz.com.

We have self assessed our report as an A+ and it has been third party checked by our assurance provider.





Statement GRI Application Level Check

GRI hereby states that **ANZ Banking Group** has presented its report “ANZ Global Reporting Initiative Index 2010” to GRI’s Report Services which have concluded that the report fulfills the requirement of Application Level A+.

GRI Application Levels communicate the extent to which the content of the G3 Guidelines has been used in the submitted sustainability reporting. The Check confirms that the required set and number of disclosures for that Application Level have been addressed in the reporting and that the GRI Content Index demonstrates a valid representation of the required disclosures, as described in the GRI G3 Guidelines.

Application Levels do not provide an opinion on the sustainability performance of the reporter nor the quality of the information in the report.

Amsterdam, 24 June 2011

A handwritten signature in blue ink, appearing to read "Nelmara Arbex", is written over a large, faint watermark of the GRI globe logo.

Nelmara Arbex
Deputy Chief Executive
Global Reporting Initiative



The “+” has been added to this Application Level because ANZ Banking Group has submitted this report for external assurance. GRI accepts the reporter’s own criteria for choosing the relevant assurance provider.

The Global Reporting Initiative (GRI) is a network-based organization that has pioneered the development of the world’s most widely used sustainability reporting framework and is committed to its continuous improvement and application worldwide. The GRI Guidelines set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance. www.globalreporting.org

Disclaimer: Where the relevant sustainability reporting includes external links, including to audio visual material, this statement only concerns material submitted to GRI at the time of the Check on 10 June 2011. GRI explicitly excludes the statement being applied to any later changes to such material.

TABLE OF CONTENTS

PROFILE DISCLOSURES		5
	1. STRATEGY AND ANALYSIS	5
	2. ORGANISATIONAL STRUCTURE	6
	3. REPORT PARAMETERS	8
	3. REPORT, SCOPE & BOUNDARIES	8
	4. GOVERNANCE	11
	4. COMMITMENTS	14
	4. ENGAGEMENT	16
PRODUCT AND SERVICES IMPACT		19
	PRODUCT PORTFOLIO	19
	AUDIT	23
	ACTIVE OWNERSHIP	23
ECONOMIC		25
	MANAGEMENT APPROACH	25
	ECONOMIC PERFORMANCE	25
	MARKET PRESENCE	27
	INDIRECT ECONOMIC IMPACTS	28
ENVIRONMENT		30
	MANAGEMENT APPROACH	30
	MATERIALS	30

TABLE OF CONTENTS

	ENERGY	31
	WATER	32
	BIODIVERSITY	33
	EMISSIONS, EFFLUENTS AND WASTE	34
	PRODUCTS AND SERVICES	36
	COMPLIANCE	37
	TRANSPORT	37
LABOUR PRACTICES AND DECENT WORK		38
	MANAGEMENT APPROACH	38
	EMPLOYMENT	38
	LABOUR/MANAGEMENT RELATIONS	39
	OCCUPATIONAL HEALTH AND SAFETY	41
	TRAINING AND EDUCATION	43
	DIVERSITY AND EQUAL OPPORTUNITY	44
HUMAN RIGHTS		46
	MANAGEMENT APPROACH	46
	INVESTMENT AND PROCUREMENT PRACTICES	46
	NON-DISCRIMINATION	48
	FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING	49
	CHILD LABOUR	49
	FORCED AND COMPULSORY LABOUR	50
	SECURITY PRACTICES	50
	INDIGENOUS RIGHTS	51

TABLE OF CONTENTS

SOCIETY		52
	MANAGEMENT APPROACH	52
	COMMUNITY	52
	CORRUPTION	55
	PUBLIC POLICY	56
	ANTI-COMPETITIVE BEHAVIOUR	57
	COMPLIANCE	57
PRODUCT RESPONSIBILITY		58
	MANAGEMENT APPROACH	58
	CUSTOMER HEALTH AND SAFETY	58
	PRODUCT AND SERVICES LABELING	59
	MARKETING AND COMMUNICAITONS	62
	CUSTOMER PRIVACY	63
	COMPLIANCE	63

PROFILE DISCLOSURES

PROFILE DISCLOSURES

1. STRATEGY AND ANALYSIS

Indicator	Description	Reported	Commentary
1.1	Statement from the most senior decision-maker of the organization.	Fully	<p>Messages from:</p> <ul style="list-style-type: none"> ▪ John Morschel, ANZ Chairman ▪ Mike Smith, ANZ CEO ▪ More from our CEO, Mike Smith <p>Find out more about our approach to Corporate Responsibility and our performance to date:</p> <ul style="list-style-type: none"> ▪ ANZ's Corporate Responsibility framework ▪ Corporate Responsibility governance ▪ Corporate Responsibility targets ▪ Corporate Responsibility performance
1.2	Description of key impacts, risks, and opportunities.	Fully	<p>Our annual CR review (printed and online) highlights the material issues from the previous financial year, and provides a series of case studies demonstrating how respond to these issues in the development of new initiatives, or by further embedding our responsibilities into our business policies and practices.</p> <p>Find out more about:</p>

PROFILE DISCLOSURES

			<ul style="list-style-type: none"> ▪ Our approach to reporting <p>Our 2010 performance, our CR targets for the year ahead, and our CR governance structure:</p> <ul style="list-style-type: none"> ▪ ANZ's Corporate Responsibility framework ▪ Corporate Responsibility targets ▪ Corporate Responsibility performance ▪ Corporate Responsibility governance <p>Read more about our approach to stakeholder engagement and risk management, and key activity in our previous financial year.</p> <ul style="list-style-type: none"> ▪ Principles Risks & Uncertainties (pgs 74 – 81) ▪ Financial Risk Management (pgs 140-164)
--	--	--	--

2. ORGANISATIONAL STRUCTURE

Indicator	Description	Reported	Commentary
2.1	Name of organization	Fully	<ul style="list-style-type: none"> ▪ ANZ Banking Group
2.2	Primary brands, products and services	Fully	<ul style="list-style-type: none"> ▪ About our business ▪ Our company profile
2.3	Operational structure	Fully	<ul style="list-style-type: none"> ▪ About our business

PROFILE DISCLOSURES

	of organisation		<ul style="list-style-type: none"> ▪ Our company profile
2.4	Location of headquarters	Fully	<ul style="list-style-type: none"> ▪ 833 Collins Street, Melbourne, Australia
2.5	Number and name of countries	Fully	<p>ANZ operates in 32 countries worldwide and employ more than 50,000 people across our region.</p> <ul style="list-style-type: none"> ▪ About our business ▪ Our countries of operation
2.6	Nature of ownership and legal form	Fully	<ul style="list-style-type: none"> ▪ About ANZ ▪ Our company profile ▪ Our economic profile
2.7	Markets served	Fully	<p>ANZ operates in 32 countries across Australia, New Zealand, Asia Pacific, Europe and America.</p> <ul style="list-style-type: none"> ▪ About our business ▪ Our company profile ▪ Our countries of operation
2.8	Scale of the reporting organisation	Fully	<ul style="list-style-type: none"> ▪ About ANZ ▪ Our company profile ▪ Our economic profile
2.9	Significant changes during the reporting period regarding size, structure, or	Fully	<p>In 2010, we completed the acquisition of RBS businesses in six countries; the Philippines, Vietnam, Hong Kong, Taiwan, Singapore and Indonesia. Additionally, we assumed full ownership of ING Australia & ING New Zealand, wealth management and insurance companies.</p>

PROFILE DISCLOSURES

	ownership		<ul style="list-style-type: none"> ▪ RBS acquisition ▪ ING acquisition
2.10	Awards received in the reporting period	Fully	<ul style="list-style-type: none"> ▪ ANZ awards and recognition

3. REPORT PARAMETERS

Indicator	Description	Reported	Commentary
3.1	Reporting period	Fully	<ul style="list-style-type: none"> ▪ 1 October 2009 to 30 September 2010
3.2	Date of most recent previous report	Fully	<ul style="list-style-type: none"> ▪ November 2010 ▪ 2010 Corporate Responsibility and Shareholder Review
3.3	Reporting cycle	Fully	<ul style="list-style-type: none"> ▪ Annual and half year
3.4	Contact point	Fully	<ul style="list-style-type: none"> ▪ Contact us

3. REPORT, SCOPE & BOUNDARIES

Indicator	Description	Reported	Commentary
3.5	Defining our report	Fully	We are committed to providing stakeholders with open, transparent and timely disclosure of the material economic, social and environmental issues facing our business. Each year we conduct extensive engagement with internal and external stakeholders to understand the material issues

PROFILE DISCLOSURES

			<p>that are important to our business. This process then informs the development of our specific and public group-wide CR targets, and guides our reporting on an interim and annual basis.</p> <p>In 2010, for the first time we combined our Shareholder and Corporate Responsibility Review to provide an integrated view of how we think about and manage our business. This responds to our stakeholders expectations that we report on the economic, social and environmental issues and opportunities relevant to our business, and provide stakeholders with a more complete and balanced picture of our financial and non-financial performance and results.</p> <p>Read more about our:</p> <ul style="list-style-type: none"> ▪ Corporate Responsibility framework, ▪ our approach to stakeholder engagement ▪ reporting
3.6	Boundary of report	Fully	<ul style="list-style-type: none"> ▪ 2010 CR and Shareholder Review ▪ CR framework ▪ Approach to reporting
3.7	Limitations on scope/boundary	Fully	<ul style="list-style-type: none"> ▪ 2010 CR and Shareholder Review ▪ CR framework ▪ Approach to reporting
3.8	Reporting on joint ventures and other entities	Fully	<ul style="list-style-type: none"> ▪ 2010 CR and Shareholder Review <p>Find out more about our CR framework, and our company governance structures:</p> <ul style="list-style-type: none"> ▪ Corporate Responsibility governance ▪ Corporate governance

PROFILE DISCLOSURES

			<ul style="list-style-type: none"> ▪ About our business profile ▪ Where we operate
3.9	Data measurement techniques	Fully	<ul style="list-style-type: none"> ▪ Corporate Responsibility definitions
3.10	Restatements	Fully	Each year in the Annual Report and Accounts (pg 11) we clearly identify any material changes to our business in terms of structure, investments, mergers, acquisitions, etc. When restatements are required - for either our financial, or our environmental or social reporting - they are clearly identified and explained.
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report	Fully	<p>This year, we have combined our Shareholder and Corporate Responsibility Reviews to provide an integrated view of how we think about and manage our business. Our stakeholders, including shareholders and our staff, are increasingly interested in the economic, social and environmental issues and opportunities relevant to our business. The Shareholder and Corporate Responsibility Review describes how ANZ is managing both financial and non-financial issues, giving a more complete and balanced picture of our performance and results.</p> <ul style="list-style-type: none"> ▪ John Morschel, ANZ Chairman
3.12	Location of content	Fully	<ul style="list-style-type: none"> ▪ anz.com/cr ▪ GRI: online index ▪ CR library ▪ 2010 CR and Shareholder Review
3.13	External assurance	Fully	<ul style="list-style-type: none"> ▪ About our approach to assurance ▪ 2010 financial year assurance statement ▪ Environment Assurance Statement

PROFILE DISCLOSURES

4. GOVERNANCE

Indicator	Description	Reported	Commentary
4.1	Organisation governance structure	Fully	<p>ANZ's corporate governance structure is described in our annual report (pgs 46-63).</p> <ul style="list-style-type: none"> ▪ ANZ Corporate Governance
4.2	Chair of the highest governance body	Fully	<p>Mr John P Morschel has been an independent non-executive director since October 2004. Mr Morschel was appointed Chairman with effect from 1 March 2010, and is an ex-officio member of all Board Committees.</p> <ul style="list-style-type: none"> ▪ Read the Chairman's biography
4.3	Highest governance body structure / composition	Fully	<ul style="list-style-type: none"> ▪ ANZ governance
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the Board.	Fully	<p>ANZ Corporate Responsibility (CR) Committee is a strategic leadership body with Management Board mandate. It performs an oversight and advisory role in achieving the Group's CR agenda and priorities.</p> <p>The Committee is made up of Group Executives with accountability for the businesses and issues most relevant to our CR strategy. The Committee is chaired by ANZ's Chief Executive Officer, Mike Smith.</p> <p>We understand that our shareholders are increasingly interested in our approach to managing social, environmental and economic risks. As such we continue to engage with our shareholders on these matters. In 2010, our Chairman met with one of our largest shareholders to discuss our approach. These matters were also discussed at Board meetings throughout the year.</p>

PROFILE DISCLOSURES

			<p>Find out more about the mechanisms in place to receive feedback from our stakeholders:</p> <ul style="list-style-type: none"> ▪ Commitment to shareholders: Communication (pg 61) ▪ Access to directors (pg 54) ▪ Stakeholder engagement ▪ Employee engagement
4.5	Compensation and performance management of the highest governance body, senior managers, and executives.	Fully	<p>We use a balanced scorecard evaluation of various corporate indicators (including social and environmental) to determine performance-related compensation for all managers and senior executives, including our CEO. These measures are aligned with the achievement of ANZ's business plan, and over time have proven the most appropriate indicators of performance.</p> <ul style="list-style-type: none"> ▪ 2010 Remuneration Report (pgs 15-45) ▪ Our approach to remunerations & benefits ▪ Our approach to performance management
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	Fully	<p>We have policies and procedures in place to help to avoid conflicts of interest at all levels of our business including Directors:</p> <ul style="list-style-type: none"> ▪ Conflict of interest (pg 53) ▪ ANZ Directors Disclosure of Interest Policy and Policy for Handling Conflicts of Interest <p>All employees are required to adhere to our Code of Conduct principles, including 'identifying conflicts of interest and managing them responsibly'.</p>
4.7	Expertise of governance body	Fully	<ul style="list-style-type: none"> ▪ About ANZ Directors' qualifications, experience and special responsibilities (pgs 11-12) ▪ Corporate Governance at ANZ (pgs 46-63)

PROFILE DISCLOSURES

4.8	Mission and values statement	Fully	<p>ANZ's values are Integrity, Collaboration, Accountability, Respect, and Excellence.</p> <p>Our employee Code of Conduct and Ethics applies to everyone who is employed by or works at ANZ including employees (both permanent and temporary), contractors and consultants. The Code is supported by a number of more detailed policies that form part of the ANZ Conduct and Ethics Policy Framework.</p> <p>Our Code and its supporting policy framework set the standard for the way we do business at ANZ and, along with our values, provide guidance to all employees on how to successfully navigate ethical challenges that may be encountered in our work. ANZ's Corporate Responsibility framework describes the role we play in society - helping to create prosperity and build thriving communities while growing our business responsibly - and helps to guide ANZ's decisions, investments and initiatives.</p>
4.9	Procedures of overseeing identification and management of economic, environmental and social performance	Fully	<p>ANZ Corporate Responsibility (CR) Committee is a strategic leadership body with Management Board mandate. It performs an oversight and advisory role in achieving the Group's CR agenda and priorities.</p> <p>The Committee is made up of Group Executives with accountability for the businesses and issues most relevant to our CR strategy. The Committee is chaired by ANZ's Chief Executive Officer, Mike Smith and meets six times each year.</p> <ul style="list-style-type: none"> ▪ Find out about our approach to risk management
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and	Fully	<ul style="list-style-type: none"> ▪ Our approach to assessing Director performance (pgs 54 – 55) ▪ Our approach to Corporate Responsibility reporting and performance

PROFILE DISCLOSURES

	social performance		
--	--------------------	--	--

4. COMMITMENTS

Indicator	Description	Reported	Commentary
4.11	Application of a precautionary approach	Fully	<p>ANZ's Risk Management framework provides a robust structure for the identification and management of risks from the Board to business unit level.</p> <ul style="list-style-type: none"> ▪ Embedding responsible practices in everyday business.
4.12	Externally developed initiatives	Fully	<p>ANZ's Corporate Responsibility framework was developed through consultation with more than 600 of our customers, employees, community groups, regulators and governments throughout our 'super-region'.</p> <p>Our corporate governance approach is informed by internationally recognised best practice principles, framework and tools, including:</p> <ul style="list-style-type: none"> ▪ Equator Principles - We have applied the Equator Principles in all project finance decision making since 2006. The Equator Principles are a set of voluntary standards designed to help banks identify and manage the social and environmental risks associated with project finance transactions. ▪ UN Global Compact - In 2010 we became a signatory to the UN Global Compact and applied the UNGC framework in the development of our human rights standards, 'Respecting people and communities: ANZ's approach to human rights.' ▪ OECD Guidelines for Multi-national Enterprises - Since May 2007, we have supported the OECD Guidelines for Multi-National Enterprises as a comprehensive framework

PROFILE DISCLOSURES

			<p>approach to responsible business management.</p> <p>We also consider global best practice standards in the lending decisions that we make with clients in sensitive sectors. For example, in 2006 we became an Ordinary Member of the Roundtable for Sustainable Palm Oil (RSPO).</p>
4.13	Memberships in associations	Fully	<p>We participate and support a number of external initiatives, including:</p> <ul style="list-style-type: none"> ▪ Carbon Disclosure Project ▪ Equator Principles ▪ Global Reporting Initiative (GRI) and the GRI Australian Focal Point ▪ OECD Guidelines for Multinational Enterprises ▪ Partnerships Brokering Accreditation Scheme ▪ World Business Council for Sustainable Development ▪ United Nations Environment Program Finance Initiative ▪ UN Global Compact and UN Global Compact Australian Network ▪ Principles for Social Investment ▪ Low Carbon Australia <p>Find out more about:</p> <ul style="list-style-type: none"> ▪ Our approach to stakeholder engagement

PROFILE DISCLOSURES

4. ENGAGEMENT

Indicator	Description	Reported	Commentary
4.14	List of stakeholder groups	Fully	<p>Our key stakeholders include: Government, regulators, shareholders, investors, customers, employees and the communities in which we operate. We use the input of stakeholders to strengthen decision making and identify ways to improve products and processes.</p> <p>Find out more about:</p> <ul style="list-style-type: none"> ▪ Our approach to stakeholder engagement
4.15	Identification and selection of stakeholders	Fully	<p>We identify our stakeholders by conducting regular dialogue across a number of business and functional areas. This includes consideration of 'silent' stakeholders such as future generations and the environment. A global stakeholder database is used for managing information and communicating to our stakeholders. It includes around 6,000 individual stakeholders who we have identified as important to our business, including governments, regulators, customer and community groups, suppliers, investors and employees.</p> <p>Find out more about:</p> <ul style="list-style-type: none"> ▪ Our approach to stakeholder engagement
4.16	Approaches to stakeholder engagement	Fully	<p>Each year, we conduct extensive engagement with internal and external stakeholders to understand the material issues that are important to our business. Stakeholder engagement is embedded into our business strategy and decision making processes. We seek to understand the expectations of our stakeholders by learning about them, understanding their motivations, engaging with our toughest critics and developing shared goals where appropriate. This helps us to balance the competing needs of stakeholders, respond to concerns and manage issues in an informed and effective manner.</p>

PROFILE DISCLOSURES

			<p>Our approaches to stakeholder engagement include:</p> <ul style="list-style-type: none"> ▪ dialogue in the form of stakeholder forums, participation in multi-stakeholder initiatives and meetings ▪ consultation through surveys, focus groups and online feedback forms ▪ communication through our CR newsletter and website ▪ partnerships with community organisations <p>We hold forums for specific stakeholder groups each year to seek formal input into our business agenda. These forums are attended by a consistent group of stakeholders, along with new participants, ensuring progress and tracking of issues that have been raised in past forums, together with the identification of new and emerging issues. Ongoing engagement on key strategic and operational decisions is prioritised by involving our stakeholders in internal working groups, focus groups, seminars and surveys.</p> <p>This process then informs the development of our specific and public group-wide CR targets, which are reported on an interim and annual basis as part of our Corporate Responsibility framework reporting.</p>
4.17	Key issues and concerns of stakeholders	Fully	<p>Our annual CR review (printed and online) highlights the material issues from the previous financial year, and provides a series of case studies demonstrating how respond to these issues in the development of new initiatives, or by further embedding our responsibilities into our business policies and practices.</p> <ul style="list-style-type: none"> ▪ 2010 CR and Shareholder Review <p>Read more about our:</p> <ul style="list-style-type: none"> ▪ CR framework

PROFILE DISCLOSURES

			<ul style="list-style-type: none">▪ approach to stakeholder engagement
--	--	--	--

PRODUCT AND SERVICES IMPACT

PRODUCT AND SERVICES IMPACT

PRODUCT PORTFOLIO

Indicator	Description	Reported	Commentary
FS1	Policies with specific environmental and social components applied to business lines	Fully	<p>Our aim is to make balanced, informed and transparent decisions and work with our clients to help them improve their management of business, social and environment risks and to make the most of opportunities.</p> <p>For example, our new Reputation Risk Policy helps guide ANZ employees in making decisions that are particularly important to our reputation, like designing or approving a product, lending money to a new client or entering a joint venture with a third party.</p> <p>We have also developed a series of policies that guide our engagement with customers in socially and environmentally sensitive sectors.</p> <p>We apply the Equator Principles to all direct financing of large infrastructure projects such as dams, mines and pipelines.</p> <ul style="list-style-type: none"> ▪ View a full list of our Group-wide policies
FS2	Procedures for assessing and screening environmental and social risks in business lines	Fully	<p>We have established decision-making frameworks and policies to ensure our lending decisions are guided by sound social and environmental standards and take into account reputation risk. They are supported by strong governance structures and employee training and education.</p> <p>Our Corporate Responsibility Committee monitors current and emerging corporate responsibility risks and opportunities and reports to ANZ's Management Board on response strategies. Effective management of reputation risk issues is a shared key performance indicator for ANZ Management</p>

PRODUCT AND SERVICES IMPACT

			<p>Board.</p> <p>In our efforts to continually improve our support for customers showing early signs of financial stress, our Customer Connect team are piloting two new assistance measures that offer customers with timely and effective access to financial support:</p> <ul style="list-style-type: none"> ▪ Independent debt advice referral service ▪ Early assistance pilot
FS3	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreement or transactions	Fully	<p>All new customer relationships are assessed for social and environmental risk. Existing customer relationships are considered on an annual basis, or more frequently if necessary.</p> <p>Where social and environmental issues are identified through screening or monitoring, our approach and strong preference is to work with the customer to improve their performance.</p> <p>Find out more about:</p> <ul style="list-style-type: none"> ▪ Our approach.
FS4	Process(es) for improving staff competency to implement environmental and social policies and procedures as applied to business lines	Fully	<p>We have developed training programs to help our staff identify and manage any social or environmental risks in our Corporate and Institutional lending decisions.</p> <p>Additionally, we conduct ongoing training for all Global Category Managers to improve their understanding of ANZ's Sustainable Sourcing Framework, its policies, tools and templates, and to help further embed sustainability into all sourcing decisions and category strategies.</p>
FS5	Interactions with clients and other	Fully	<p>We work closely with our customers and stakeholders to better understand issues of concern regarding our Corporate and Institutional lending decisions. Where social and environmental</p>

PRODUCT AND SERVICES IMPACT

	stakeholders regarding environmental and social risks and opportunities		<p>issues are identified, our approach and strong preference is to work with the customer to improve their performance. We monitor developments and work closely with the client, as well as external stakeholders that have raised specific concerns.</p> <p>An example of interaction with stakeholders in 2010 included engaging with a faith-based organisation in Australia following a concern raised about ANZ funding of a hydroelectric project in the Mekong region, Laos. Find out more.</p> <p>An important stakeholder for ANZ is our shareholders and in the past year we have engaged with a number of our major shareholders, who are demonstrating an increasing interest in our approach to managing social and environmental risks. In 2010, our Chairman met with one of our largest shareholders to discuss our approach to responsible business. These matters were also discussed at Board meetings throughout the year.</p>
FS6	Percentage of the portfolio for business lines by specific region, size (e.g. micro/SME/large) and by sector	Fully	<ul style="list-style-type: none"> ▪ Our business structure ▪ Our company profile ▪ Our countries of operation ▪ About our customers ▪ Our approach to sensitive sector lending ▪ Our approach to project financing ▪ ANZ's segment analysis (pgs 173-174) ▪ ANZ acquisitions
FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by	Fully	<p>We have made a significant investment over a number of years to help improve the financial literacy and inclusion in our communities. We have developed innovative programs that are improving the financial capability of people on low incomes and from disadvantaged groups, including Indigenous communities. These programs (Saver Plus, MoneyMinded, MoneyBusiness and Progress Loans) bring real benefits to participants and the community as a whole, while also delivering long-term benefits to our business and our shareholders. In 2010, we contributed more</p>

PRODUCT AND SERVICES IMPACT

	purpose		<p>than \$4.6 million (AUD) to programs to promote financial literacy and inclusion. This includes, \$1.3 million provided to people on low incomes through Progress Loans.</p> <p>In 2010, we launched our 'GIVE' program which highlights the ways we contribute to local communities by giving donations to charities, investing in partnerships with community organisations, volunteering our skills and time to support community causes and responding to emergencies through supporting disaster relief and recovery activities. In 2010, \$16.1 million was contributed to the community, including \$2 million (AUD) was donated to charities through ANZ's various community giving programs; over \$1.2 million (AUD) was donated to emergency relief and recovery efforts; and ANZ staff contributed 90,651 volunteer hours to a wide range of initiatives, projects and not-for-profit organisations.</p> <p>Find out more about ANZ's:</p> <ul style="list-style-type: none"> ▪ Commitment to providing education and employment opportunities ▪ Work to help bridge urban and rural social and economic divides ▪ Support to concession card holders
FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose	Fully	<p>We are focused on practical ways to support our customers in investing in energy efficient technology and renewable energy sources. We are working in partnership with key organisations to provide products and services that assist customers in their transition to a lower carbon economy.</p> <p>Additionally, we continue to invest in renewable energy projects, including the project financing of wind farms, and also the monetisation of renewable energy credits. Find out more.</p>

PRODUCT AND SERVICES IMPACT

AUDIT

Indicator	Description	Reported	Commentary
FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures	Fully	We utilise a program of audit and assurance - both internal and external - across all aspects of our business. Internal audit's approach is risk based and designed to provide independent assurance of the effectiveness of management's control of its own business activities. Each year Internal Audit sample a select set of businesses, processes and policies. External assurance is also conducted yearly.

ACTIVE OWNERSHIP

Indicator	Description	Reported	Commentary
FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organisation has interacted on environmental and social issues	Fully	<p>We assess 100% of all new corporate and institutional customer relationships for social and environmental risk. Existing customer relationships are considered on an annual basis, or more frequently if necessary. Social and environmental issues may be identified by an ANZ employee or as a result of concerns raised by an external stakeholder. Regardless, we will work with our customers to manage any issues. Find out more about our approach.</p> <p>We apply the Equator Principles to 100% of project finance proposals, regardless of their size or location.</p> <p>More information:</p> <ul style="list-style-type: none"> ▪ Detailed summary of our 2010 results.

PRODUCT AND SERVICES IMPACT

			<ul style="list-style-type: none"> ▪ Our approach to stakeholder engagement.
FS11	Percentage of assets subject to positive and negative environmental or social screening	Not	We recently acquired the remaining 51% stake on ING across Australia and New Zealand. ING's investment management was used throughout the 2009/10 reporting period. We are currently exploring the UNPRI framework for screening assets and investments prior to acquisition. This indicator is not currently relevant to our business and we aim to report against this indicator in FY12.
FS12	Voting polic(ies) applied to environmental or social issues for shares over which the reporting organisation holds the right to vote share or advises on voting	Not	We recently acquired the remaining 51% stake on ING across Australia and New Zealand. ING's investment management was used throughout the 2009/10 reporting period. We are currently exploring the UNPRI framework for screening assets and investments prior to acquisition. This indicator is not currently relevant to our business and we aim to report against this indicator in FY12.

ECONOMIC

ECONOMIC

MANAGEMENT APPROACH

Our approach and commitment to managing our business responsibly delivers economic, social and environmental benefits for all our stakeholders – customers, staff, shareholders and our communities. Our economic contribution to society includes our financial and in-kind investment in the community, the creation of long-term employment opportunities, procurement of products and services from suppliers and payment of taxes to governments.

Further information:

- [ANZ's economic profile](#)
- [About our Corporate Responsibility framework](#)
- [About our approach to the community](#)
- [About our employees](#)
- [About our supply chain](#)

ECONOMIC PERFORMANCE

Indicator	Description	Reported	Commentary
EC1	Economic value generated and distributed	Fully	<p>ANZ's economic contribution to society is more than financial profits. We create jobs, pay salaries and invest in the skills of our people. We also pay taxes in the countries where we operate, support business in our supply chain and provide products that satisfy the needs of our customers.</p> <p>We have constructed a table that summarises our economic value by stakeholder group.</p> <p>We use LBG to assess the impact our programs and initiatives are having on the community - to</p>

ECONOMIC

			<p>ensure that our community investments make a real difference to the community, enhance employee engagement and complement our business goals.</p> <p>Find out more about how we contribute to the communities in which we operate through our G.I.V.E program which stands for giving, investing, volunteering, and emergency relief assistance.</p>
EC2	Financial implications of climate change	Fully	<p>ANZ's commitment to thriving communities and responsible lending is demonstrated through our carbon neutral strategy and commitment to the carbon disclosure project. Environmental risks and opportunities are considered in all business decisions – particularly Project Structured Finance. These industries - including Energy - are managed through our sensitive sector policies which apply to all countries and all products and services provided to our customers.</p> <ul style="list-style-type: none"> ▪ Find out more about how we are investing in a renewable energy future, how we support customers in investment in energy efficient technology and renewable energy sources, and their transition to a carbon constrained economy
EC3	Organisation's defined benefit pension plan	Fully	<p>We have established a number of pension, superannuation and post retirement medical benefit schemes across the regions in which we operate.</p> <p>Find out more:</p> <ul style="list-style-type: none"> ▪ Superannuation and other post-employment benefits (pgs 187 – 191)
EC4	Financial assistance from government	Fully	<p>In 2010, we received funding from DEEWR to offset the costs of employing indigenous employment resource consultants. This funding, totaling \$2.8 million will run through until December 2012.</p>

ECONOMIC

MARKET PRESENCE

Indicator	Description	Reported	Commentary
EC5	Entry-level wage/local minimum wage (additional)	Fully	<ul style="list-style-type: none"> ▪ Remuneration and benefits at ANZ: Our reward strategy is to provide market competitive pay and rewards to successfully attract, motivate and retain the highest quality individuals in all regions in which we operate. We provide above market rewards to out-performers through variable pay. Approximately 60% of ANZ's workforce is based in Australia and 20% in New Zealand. ▪ Minimum employment conditions at ANZ: The minimum employment conditions of our staff in Australia are derived from the ANZ Award and collective employment agreement negotiated with the Finance Sector Union. <p>In New Zealand, staff are either covered by our collective employment agreement, negotiated with financial services union Finsec, or covered by individual employment agreements.</p> <p>In some of ANZ's operations in the Asia Pacific region, including Fiji, the Solomon Islands and Papua New Guinea, staff are covered by collective agreements made between ANZ and the representative union or staff bargaining group.</p>
EC6	Spending on locally based suppliers	Fully	<p>ANZ's supply chain is extensive, with over 15000 suppliers providing goods and services to keep our global operations functioning.</p> <p>As we pursue our super-regional strategy, we continue to focus on increasing our relationships with local suppliers. For example, today we support over 2500 suppliers in the Asia Pacific region. We also endeavour to ensure that our approach of setting minimum environmental and social standards and subsequent verification of supplier performance against these standards does not adversely affect these smaller, local suppliers.</p> <p>Management of our supply chain is facilitated through sourcing hubs located in Australia, New</p>

ECONOMIC

			<p>Zealand, Singapore, Hong Kong and India.</p> <ul style="list-style-type: none"> ▪ Our supply chain ▪ Our approach to the supply chain
EC7	Local hiring	Fully	<p>We are focused on attracting, supporting and retaining local talent, and actively improving the diversity of our team. By doing this we are better able to understand and serve an increasingly wide range of customers across multiple countries and cultures.</p> <p>In 2009, we rolled out our Lead the Future program, a unique 12 month learning program which aims to accelerate leadership and development opportunities of Pacific Nationals currently in senior roles with ANZ. The program supports our continued commitment to foster local leadership in our business. Find out more.</p>

INDIRECT ECONOMIC IMPACTS

Indicator	Description	Reported	Commentary
EC8	Infrastructure providing public benefit	Fully	<p>Our financial capability programs are creating an important and valued community resource and are shared with a number of community partners in Australia, New Zealand and the Pacific.</p> <p>Our GIVE program highlights the ways we contribute to local communities by giving donations to charities, investing in partnerships with community organisations, volunteering our skills and time to support community causes and responding to emergencies through supporting disaster relief and recovery activities.</p> <p>We use the London Benchmarking Group (LBG) to assess the impact our programs and initiatives are having on the community - to ensure that our community investments make a real difference</p>

ECONOMIC

			<p>to the community, enhance employee engagement and complement our business goals.</p> <p>We also make a positive contribution to society by sharing knowledge and expertise. ANZ Centre, our global headquarters in Melbourne was designed to be one of the most environmentally progressive buildings and has since been awarded the '6 Star Green Star' Design rating from the Green Building Council Australia. Since opening our new headquarters we have taken hundreds of people including builders, architects, governments and educators on a tour of our building to help them learn more about the building and how they can implement similar initiatives in their own properties.</p>
EC9	Indirect economic impacts (additional)	Fully	<p>Our approach and commitment to corporate responsibility delivers benefits for our shareholders and the broader community. Our Corporate Responsibility framework and priorities emphasise the role we play in society – helping to create prosperity and build thriving communities while growing our business responsibly such as:</p> <ul style="list-style-type: none"> ▪ offering financial literacy & inclusion programs ▪ supporting customers facing financial difficulties <p>applying responsible lending criteria to our retail customers and business clients</p> <ul style="list-style-type: none"> ▪ providing employment opportunities for disadvantaged and under-represented individuals; and ▪ providing basic banking services to under-served communities. <p>In 2010 we launched our GIVE program which highlights the ways we contribute to local communities by giving donations to charities, investing in partnerships with community organisations, volunteering our skills and time to support community causes and responding to emergencies through supporting disaster relief and recovery activities.</p>

ENVIRONMENT

ENVIRONMENT

MANAGEMENT APPROACH

We are committed to actively managing the environmental impact of our activities. As part of this commitment, we set clear, measurable targets to reduce our consumption of electricity, water and paper, our greenhouse gas emissions, and the amount of waste we send to landfill.

We have developed an Environment Management System (EMS) which gives us a structured approach to assessing how our operations impact on the environment and setting targets to improve our performance. Our EMS also governs how we measure and report on our progress.

Further information:

- [Our approach to the environment](#)
- [Our environmental targets & performance](#)

MATERIALS

Indicator	Description	Reported	Commentary
EN1	Material used by weight or volume	Fully	6410 tonnes (Paper usage) - covers 84% of Global Operations (FTE). This has been subject to external verification by SGS Australia Pty Ltd. Find out more.
EN2	Percentage of materials used that are recycled input materials	Fully	6% of paper is made from recycled content in Australia. This has been subject to external verification by SGS Australia Pty Ltd. Find out more.

ENVIRONMENT

ENERGY

Indicator	Description	Reported	Commentary
EN3	Direct energy consumption by primary energy source	Fully	217,015 (Gigajoules) - covers 84% of Global Operations (FTE). This has been subject to external verification by SGS Australia Pty Ltd. <ul style="list-style-type: none"> ▪ Find out more. SGS Australia Pty Ltd. View our detailed environmental performance report for a breakdown by source (PDF 19kB).
EN4	Indirect energy consumption by primary source	Fully	787,676 (Gigajoules) - covers 84% of Global Operations (FTE). This has been subject to external verification by SGS Australia Pty Ltd. <ul style="list-style-type: none"> ▪ View our detailed environmental performance report for a breakdown by source (PDF 19kB). ▪ Find out more.
EN5	Energy saved due to conservation and efficiency improvements (additional)	Fully	2010 was a year of property consolidation for the ANZ which lead to an increase in total energy consumption which was expected for the period. In 2011 ANZ is forecasting to see a 6% reduction in energy per FTE in comparison to 2009. In the period 2004 to 2009 ANZ in Australia realised a 14% reduction in premises energy per FTE.
EN6	Initiatives to provide energy-efficient or renewable energy based products and services (additional)	Fully	In October 2009 moved into the ANZ Centre for the first time which includes infrastructure to generate electricity from wind and solar. In 2010 ANZ generated 154,304 kWh (555 gigajoules) of electricity from renewable energy sources covering the ANZ Centre and the ANZ data centre which has solar panels.

ENVIRONMENT

EN7	Initiatives to reduce indirect energy consumption (additional)	Fully	In 2010 ANZ has identified specific savings in Australia of 1,355 MWH of energy associated with the move to four cylinder vehicles and associated improved vehicle efficiency. Similar savings have been achieved in New Zealand following the expansion of the use of both diesel and four cylinder vehicles. ANZ has also achieved savings of 1,941 MWH associated with improvements at two of our large commercial sites and with the removal of 400 redundant servers as part of a consolidation project. The emissions reduction associated with this activity has been calculated at 3,738 tonnes. These have been included in our National Carbon Offset Standard Public Disclosure Summary as part of the completion of our carbon neutral commitment .
-----	--	-------	---

WATER

Indicator	Description	Reported	Commentary
EN8	Total water withdrawal by source	Fully	143,735 (KL) - Australian Operations (key commercial sites) covers 30% of Global Operations (FTE) - external verification has been undertaken by SGS Australia Pty Ltd. Baselineing is underway in New Zealand. <ul style="list-style-type: none"> ▪ Find out more.
EN9	Water sources affected (additional)	Not	This indicator is not relevant to ANZ's business due to relatively low water intensity of the industry. Water used in our operations comes from municipal water supplies only and we report on this usage.
EN10	Percentage and total volume of water recycled and reused (additional)	Partially	ANZ has a water recycling facility at the ANZ Centre which is our largest commercial property. It commenced commissioning during 2010 and became fully operational in January 2011. ANZ will use the water recycling system for landscape irrigation, toilet flushing and cooling tower use.

ENVIRONMENT

BIODIVERSITY

Indicator	Description	Reported	Commentary
EN11	Land in areas of high biodiversity value	Not	<p>We do not report on this issue as the disclosure is not material to our business because of the nature of our operations. ANZ's property portfolio is located in urban locations or within town centres of rural areas and therefore there is no direct impact on biodiverse habitats. We do, however, continue to work with our major clients to reduce any impact that they may have on biodiversity, such as through the application of the Equator Principles.</p> <ul style="list-style-type: none"> ▪ Our approach to responsible business lending.
EN12	Impacts on biodiversity	Not	As above
EN13	Habitats protected or restored (additional)	Not	As above
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity (additional)	Not	As above
EN15	IUCN Red List species (additional)	Not	As above

ENVIRONMENT

EMISSIONS, EFFLUENTS AND WASTE

Indicator	Description	Reported	Commentary
EN16	Total direct and indirect greenhouse gas emissions by weight	Fully	218,803 tonnes - covers all of the Global Operations (scope 1 & scope 2). This has been subject to external verification by SGS Australia Pty Ltd. <ul style="list-style-type: none"> ▪ Find out more.
EN17	Other relevant indirect greenhouse gas emissions by weight	Fully	102,865 tonnes - covers all of the Global Operations - (scope 3 only). This has been subject to external verification by SGS Australia Pty Ltd. <ul style="list-style-type: none"> ▪ Find out more.
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved (additional)	Fully	ANZ has achieved emissions savings of 3,870 tonnes through the energy reduction program of the Australian operations as documented in the National Carbon Offset Standard Public Disclosure Summary.
EN19	Emissions of ozone-depleting substances by weight	Partially	Given the nature of our business (financial services), ANZ has only a very small amount of emissions of ozone-depleting substances (HCFC's). The main source is the use of R22 based equipment which is being phased out in line with the requirements for the Montreal Protocol by 2016. ANZ does not report on this indicator as the Group's business activities do not result in significant emissions of these substances. We have assessed our impacts and believe this is not a material impact of our operations.
EN20	NOx, SOx, and other significant air emissions by type and	Not	We do not report on this indicator as the disclosure is not material to our business because the Group's business activities/operations do not generate significant emissions of these substances.

ENVIRONMENT

	weight		
EN21	Total water discharge by quality and destination	Not	We do not report on this indicator as the disclosure is not material to our business because all water is discharged to public waste water treatment across our operations.
EN22	Total weight of waste by type and disposal method	Fully	Waste to landfill - 1,974 tonnes (CO2-e) all operations (estimated) based on performance in Australia. Total recycling - 4,191 tonnes, covers data for Australia and New Zealand operations - representing 75% of Global Operations (FTE). Both sets of data have been subject to external verification by SGS Australia Pty Ltd.
EN23	Total number and volume of significant spills	Fully	There have been no significant spills from any ANZ facility in the reporting year. In addition, the Group's business activities do not have a material risk of significant spills of hazardous substances.
EN24	Waste deemed hazardous (additional)	Not	This indicator is not relevant to ANZ's business as we do not deal with waste deemed as hazardous as part of our operations.
EN25	Water bodies affected by discharges (additional)	Partially	ANZ does not have any relevant discharges into waterways.

ENVIRONMENT

PRODUCTS AND SERVICES

Indicator	Description	Reported	Commentary
EN26	Initiatives to mitigate environmental impacts	Fully	<p>We have a series of initiatives in place to assist our major clients, customers, and suppliers to reduce their impact on the environment. A key priority of our Corporate Responsibility framework includes seeking to better understand the social and environmental pressures on the urban environment and identifying how we can help improve urban sustainability.</p> <p>More information on our approach:</p> <ul style="list-style-type: none"> ▪ Environment & environmental reporting ▪ Improving our environmental performance ▪ Managing environmental impacts resulting from ANZ's lending decisions ▪ Supporting our customers in reducing their environmental impacts ▪ Managing environmental impacts in the supply chain
EN27	Percentage of products sold and their packaging materials that are reclaimed by category	Not	<p>We do not report on this indicator as the disclosure is not applicable to our business because ANZ's products and services are not packaged. Nonetheless, we have taken steps to reduce the paper associated with customer interactions including changing statement cycles, introducing electronic statements and are actively investigating options to reduce our impacts in this area further.</p>

ENVIRONMENT

COMPLIANCE

Indicator	Description	Reported	Commentary
EN28	Significant fines for non-compliance with environmental laws and regulations	Fully	We are not aware of any significant fines for non-compliance with environmental laws and regulations.

TRANSPORT

Indicator	Description	Reported	Commentary
EN29	Impacts of transporting products and other goods	Fully	<p>ANZ has calculated the impact of business employee travel as 60,395 tonnes of CO2-e for the global operations. This has been subject to external verification by SGS Australia Pty Ltd. This includes hotel accommodation.</p> <p>Find out more:</p> <ul style="list-style-type: none"> ▪ Working to reduce our carbon emissions.
EN30	Total environmental protection expenditures (additional)	Fully	ANZ has established the total expenditure for 2010 as just under \$39 million for environmental expenditure protection. This includes \$35 million for the additional investment in environmental initiatives at the ANZ Centre . The ANZ Centre has achieved a 6 Star Green Star Office Design v2 rating from the Green Building Council Australia and is registered for two additional Green Star categories - Office Interiors and Office as Built.

LABOUR PRACTICES AND DECENT WORK

LABOUR PRACTICES AND DECENT WORK

MANAGEMENT APPROACH

We aim to create a working environment that is supportive of our employees - an environment based on our values. Integral to this are policies and programs which promote a culture of respect for our people and build a workforce which reflects the diversity of the communities where we operate.

Further information:

- [Our approach to employees](#)
- [Our approach to human rights](#)
- [Employee/workplace relations at ANZ](#)
- [Providing education and employment opportunities to disadvantaged and under-represented individuals](#)

EMPLOYMENT

Indicator	Description	Reported	Commentary
LA1	Breakdown of total workforce by employment type, employment contract, and region	Fully	ANZ has more than 50,000 employees around the world. Most of our people are based in Australia and New Zealand, but our workforce is increasing in the Asia Pacific region. We also have employees in the UK, Europe, the Americas and the Middle East. Most of our workforce (72%) is full-time, with 8% part-time and 20% temporary. Find out more about our employees. <ul style="list-style-type: none"> ▪ Find out more about our employees.
LA2	Employee turnover by age group, gender and region	Fully	We aim to attract and nurture the very best people through our recruitment and retention strategies. ANZ seeks to avoid redundancies, but when restructuring and redeployment are unavoidable, our processes and guidelines aim to minimise the impact on those affected. We also

LABOUR PRACTICES AND DECENT WORK

			<p>provide access to outplacement services to help affected employees find suitable roles outside the bank.</p> <p>During 2010, 10,891 employees joined ANZ. This includes 3,914 in Australia, 1,188 in New Zealand, and 4,640 in Asia Pacific. During the reporting period, 5,981 left ANZ voluntarily (2,799 in Australia, 1,075 in New Zealand and 1,246 in Asia Pacific).</p> <ul style="list-style-type: none"> ▪ Find out more, including annual turnover by gender and age. <p>We also continue to more specifically track the number of employees aged 55 years or over across our region, including annual turnover in this demographic.</p>
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations (additional)	Fully	<p>We aim to provide competitive pay and rewards to attract, motivate and retain the highest-quality individuals. Our remuneration and benefits are structured to reward people for their individual and collective contribution to our success, for demonstrating our values in action, and for creating and enhancing value for all ANZ stakeholders. We also review remuneration (fixed and variable) annually to ensure we remain market competitive in the financial services sector. Our employee benefits are available to permanent employees, regardless of their employment status being full time or part time.</p> <ul style="list-style-type: none"> ▪ Find out more about our approach to employee remuneration and benefits.

LABOUR/MANAGEMENT RELATIONS

Indicator	Description	Reported	Commentary
LA4	Percentage of employees covered by collective bargaining	Fully	The minimum employment conditions of our staff in Australia are derived from the ANZ Award and collective employment agreement negotiated with the Finance Sector Union. In 2010, following consultation with employees, we negotiated a new two-year collective employment agreement with the Finance Sector Union. The agreement contains the minimum employment terms and

LABOUR PRACTICES AND DECENT WORK

	agreements.		<p>conditions for more than 23,000 Australian-based employees in Groups 4, 5 and 6, and will run for a two-year period covering the 2010 and 2011 remuneration reviews.</p> <p>In New Zealand, staff are either covered by our collective employment agreement, negotiated with financial services union Finsec, or covered by individual employment agreements. Currently, 5,531 New Zealand employees are covered by our collective agreement, with 1,652 of these employees having nominated to join the union and are therefore subject to the terms and conditions of the collective agreement. This represents 29.87% of staff eligible or 16.12% of total employees in New Zealand.</p> <p>In some of ANZ's operations in the Pacific region, including Fiji, the Solomon Islands, Papua New Guinea and Samoa, approximately 1500 employees, which is the majority of employees in these countries, are covered by collective agreements made between ANZ and the representative union or staff representative group.</p> <p>In Singapore, 43 staff (2% of our total workforce in this region) are covered by collective bargaining agreements.</p> <ul style="list-style-type: none"> ▪ Find out more about our approach to workplace relations.
LA5	Minimum notice periods	Fully	<p>We have various retrenchment policies in place across our region. For example, in Australia, we generally provide employees who are impacted by significant operational changes with at least 12 weeks notice. Retrenchment and redeployment procedures are specified in the ANZ Collective Employment Agreement 2010-2012 (Australia) and the ANZ Retrenchment Policy.</p> <p>In New Zealand, an employee whose position becomes redundant generally receives a minimum of six weeks notice or payment in lieu. Redundancy and redeployment procedures are specified in the ANZ National Bank Collective Employment Agreement, the Individual Employment Agreements of all staff and the ANZ National Redundancy and Redeployment Policy.</p> <ul style="list-style-type: none"> ▪ About our approach to recruitment, retention and turnover

LABOUR PRACTICES AND DECENT WORK

			<ul style="list-style-type: none"> ▪ About collective bargaining agreements at ANZ
--	--	--	---

OCCUPATIONAL HEALTH AND SAFETY

Indicator	Description	Reported	Commentary
LA6	Health and safety committees (additional)	Fully	<p>We have implemented a global health and safety program and have established Health and Safety Committees in a number of countries in which we operate. These include; New Zealand, India, London, Manila and Fiji. Our employees are also represented on committees in all Australian States and Territories.</p> <p>The primary role of these committees is to provide a forum for communication and consultation regarding implementation of Health & Safety strategies and the annual Health & Safety operational Management plans. The interests of employee and employers are represented at these forums to enable free and open discussion to occur and agreement to be reached with management and employee representatives from a variety of business units in attendance.</p> <p>The minutes of H&S Committee meeting are published on the intranet. ANZ has a documented procedure for employee consultation and involvement on OH&S issues. The procedure outlines the process for consulting on health & safety issues, as well as the process for electing/selecting and training of health and safety employee representatives and health and safety management representatives. The procedure is made available to all staff via the Intranet.</p> <ul style="list-style-type: none"> ▪ Find out more about our approach to health & safety.
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and	Fully	<p>We are actively working to reduce our LTIFR - a standard measure of the effectiveness of occupational health and safety programs.</p> <p>In 2010, we undertook a significant awareness campaign to highlight the need to report lost time</p>

LABOUR PRACTICES AND DECENT WORK

	number of work-related fatalities by region		<p>injury incidents. As a result, our LTIFR has increased in New Zealand businesses. Specific actions are in place to continue to improve our LTIFR performance in Australia and New Zealand.</p> <ul style="list-style-type: none"> ▪ View our detailed 2010 results.
LA8	Education, training, counseling, prevention and risk-control programs for employees relating to serious diseases	Fully	<p>ANZ's global health promotion program focuses on various health issues with the aim of creating awareness and providing information to staff.</p> <ul style="list-style-type: none"> ▪ About our approach to health, safety and wellbeing.
LA9	Health and safety in union agreements (additional)	Fully	<p>ANZ has put in place a Health and Safety Management System (HSMS) to identify, assess and control factors in the workplace and our operations, which may affect the safety, health, security and well-being of employees.</p> <p>While the HSMS does not form part of employee collective bargaining agreements, we provide resources, including internal and external expertise, and supporting policies and procedures, to support our commitment to promote a safe and health workplace.</p> <p>Find out more about:</p> <ul style="list-style-type: none"> ▪ Our approach to health, safety & wellbeing ▪ ANZ employee collective bargaining agreements

LABOUR PRACTICES AND DECENT WORK

TRAINING AND EDUCATION

Indicator	Description	Reported	Commentary
LA10	Hours of training	Fully	<p>In 2010, we invested over \$50 million in learning and development, which equated to an average of 21 hours of learning per employee.</p> <p>Learning investment included the provision of 634,671 online course enrolments (32.8% increase on 2009). There was a decrease in learning hours due to the cyclical requirements of regulatory compliance learning and a decrease in onboarding requirements.</p> <ul style="list-style-type: none"> ▪ About our approach to learning & development
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings (additional)	Fully	<p>Our learning and development opportunities include on-the-job experiences, coaching, secondments and formal learning.</p> <ul style="list-style-type: none"> ▪ Find out more. <p>ANZ seeks to avoid redundancies, but when restructuring and redeployment are unavoidable, our processes and guidelines aim to minimise the impact on those affected. We also provide access to outplacement services to help affected employees find suitable roles outside the bank.</p> <ul style="list-style-type: none"> ▪ Find out more. <p>In 2009, in collaboration with the Finance Sector Union (FSU) in Australia and FINSEC in New Zealand we launched the New Career Training Fund and the Past Employee Care Fund to help affected staff retrain and reskill for their next job and provide additional financial support to staff who need it if affected by offshoring.</p> <ul style="list-style-type: none"> ▪ Find out more.

LABOUR PRACTICES AND DECENT WORK

LA12	Performance and career development (additional)	Fully	<p>100% of our employees receive a structured performance appraisal and measurable targets each year. See more detail about our approach to performance management.</p> <p>We value and invest in leadership at every level of the organisation. We identify our future leaders and broaden their leadership capabilities through our Leadership Talent Radar. In total, 588 employees worldwide were on our Leadership Talent Radar in 2010.</p> <p>We also have a range of customised offerings for specific leadership learning requirements, for example, our Lead the Future program in the Pacific which aims to accelerate leadership and development opportunities of Pacific Nationals currently in senior roles with ANZ.</p> <ul style="list-style-type: none"> ▪ Find out about our approach to learning & development.
------	---	-------	--

DIVERSITY AND EQUAL OPPORTUNITY

Indicator	Description	Reported	Commentary
LA13	Employees according to diversity	Fully	<p>Our goal is to build a workforce that reflects the diversity of the communities in which we operate. This means creating a work environment where employee differences such as gender, age, culture, disability and lifestyle choice are valued. We view diversity as a strategic asset, and believe that the perspectives, experiences and contributions of our people are the source of ANZ's creativity, innovation and business success.</p> <ul style="list-style-type: none"> ▪ View a detailed summary of our diversity performance in 2010. ▪ Supporting women at ANZ ▪ Embracing cultural diversity at ANZ ▪ Supporting mature-aged workers at ANZ

LABOUR PRACTICES AND DECENT WORK

LA14	Basic salary of men and women	Fully	<ul style="list-style-type: none">▪ View our 2010 gender pay differentials by country and employment group.▪ About our approach to supporting women in the workforce.
------	-------------------------------	-------	--

HUMAN RIGHTS

HUMAN RIGHTS

MANAGEMENT APPROACH

This year, we have drawn together a set of standards to further embed a culture of respect in how we treat our employees, work with our clients and suppliers and contribute to the communities where we operate. We have called these standards “Respecting people and communities – ANZ’s approach to human rights.”

Further information:

- [Our approach to human rights](#)
- [Our human rights standards in action](#)

INVESTMENT AND PROCUREMENT PRACTICES

Indicator	Description	Reported	Commentary
HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening	Fully	<p>ANZ has a policy which requires that our Corporate and Institutional customers be assessed in relation to their activities, practices or any associations that may involve environmental or social risk, including their impact on human rights. We have developed a range of resources to assist our staff in assessing clients for such risk including screening tools and checklists. We apply this screen to all new clients globally. Existing clients are screened on an annual basis, and again before entering any transaction judged by ANZ to have a potentially significant environmental or social impact - including human rights.</p> <p>Additionally we apply the Equator Principles to all large infrastructure projects such as dams, mining and pipelines that we finance. All projects are evaluated against comprehensive international performance standards on issues such as labour and working conditions, natural</p>

HUMAN RIGHTS

			<p>resource management, pollution prevention, impacts on Indigenous people, and community health and safety.</p> <ul style="list-style-type: none"> ▪ Find out more about our approach to human rights.
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken.	Fully	<p>We apply a risk-based approach in managing supplier compliance against the social (including a number of human rights impacts) and environmental requirements set out in our Supplier Sustainability Code of Practice; which includes a combination of self-assessment and on-site audits.</p> <p>Our risk framework states the following:</p> <ul style="list-style-type: none"> ▪ High social and/or environmental risk suppliers are required to comply with our Supplier Sustainability Code of Practice and compliance is assessed through independent on-site audits. Compliance with our Code is a condition of continued business with ANZ. ▪ Medium social and/or environmental risk suppliers may be required to undertake external verification of their response to our Sustainability Self-Assessment Tool. ▪ Low-risk suppliers will be required to complete a self-assessment of their compliance on request from ANZ. <p>In 2010, we undertook independent on-site audits of four suppliers of 'high-risk' supply agreements. These identified two minor non-compliances, where suppliers did not have systems in place to monitor and manage the impacts of their own suppliers. Both suppliers have since commenced their own programs to build and/or improve management systems.</p> <ul style="list-style-type: none"> ▪ About our approach to the supply chain
HR3	Total hours of	Fully	Our human rights standards are already embedded in a many of our internal education and

HUMAN RIGHTS

	employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained (additional)		<p>training programs. For example ANZ's 'Living the Code' online training covers the principles of our Code of Conduct and Ethics, including employee obligations in key areas such as fraud, corruption, anti-bribery, and equal employment opportunity, bullying and harassment. 100% of ANZ employees are required to complete this training annually.</p> <p>Where appropriate we will develop specific training to help employees, such as our supply chain category managers, and our client relationship managers manage human rights related risks and opportunities in their roles.</p> <ul style="list-style-type: none"> ▪ Find out more about our approach to human rights.
--	---	--	--

NON-DISCRIMINATION

Indicator	Description	Reported	Commentary
HR4	Incidents of discriminations and outcomes	Fully	<ul style="list-style-type: none"> ▪ Total incidents reported: 25 ▪ Breakdown of incidents: <ul style="list-style-type: none"> ○ 22 incidents involving employees ○ 3 incidents involved a customer <p>Outcomes:</p> <ul style="list-style-type: none"> ▪ 4 cases involving an employee in Australia, we substantiated the employee's complaint (2 employee were reprimanded and 2 were terminated as a result) ▪ 8 cases, the incident was not substantiated and no action was taken ▪ 9 cases involving employees, some other remedial action was taken (e.g. training) ▪ 2 cases, the claim was withdrawn (1 customer and 1 employee) (i.e. 'no action taken').

HUMAN RIGHTS

			<ul style="list-style-type: none"> 2 cases were 'resolved' (2 customer complaints). <p>No cases are ongoing ('open')</p>
--	--	--	---

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Indicator	Description	Reported	Commentary
HR5	Freedom of Association and collective bargaining	Fully	<p>ANZ respects the right of employees to join, or not join, associations of their choice. We do not interfere in an employee's decision to associate or not associate, or discriminate against the employee or a representative of the employee. These commitments are upheld in our Freedom of Association Policy.</p> <ul style="list-style-type: none"> About our approach to workplace relations

CHILD LABOUR

Indicator	Description	Reported	Commentary
HR6	Eliminating child labour	Fully	<p>We do not tolerate the use of child labour in our own business. Our human rights standards commit us to use our influence with suppliers to protect against the exploitation of children in the workplace. Additionally, where we find a customer's operations do not meet our standards, we will work constructively with them to support their adoption of international best practices, focusing on the best interests of the child.</p> <p>For example, we apply the Equator Principles to major infrastructure projects that we finance. This means that all projects are evaluated against comprehensive international performance standards</p>

HUMAN RIGHTS

			on issues such as labour and working conditions, which assists us in identify any real or potential incidences of child labour.
--	--	--	---

FORCED AND COMPULSORY LABOUR

Indicator	Description	Reported	Commentary
HR7	Eliminating forced or compulsory labour	Fully	<p>As set out in our human rights standards, we do not tolerate or support the use of forced or compulsory labour, including through the practices of our customers, suppliers and business partners.</p> <p>We apply the Equator Principles to major infrastructure projects that we finance. This means that all projects are evaluated against comprehensive international performance standards on issues such as labour and working conditions, which assists us in identify any real or potential incidences of forced labour.</p>

SECURITY PRACTICES

Indicator	Description	Reported	Commentary
HR8	Security personnel trained in human rights (additional)	Fully	<p>A key principle of our human rights standards is to work with our customers, business partners and suppliers to encourage their support of human rights. Over the coming year, we will engage with our security service suppliers to understand how our standards are being addressed at an organisational and industry level. We aim to pilot our approach in Australia with a view to roll out a global compliance program for all of our security service providers over time.</p>

HUMAN RIGHTS

- [Find out more about our approach to the supply chain.](#)

INDIGENOUS RIGHTS

Indicator	Description	Reported	Commentary
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken (additional)	Fully	<p>We contribute to the social, economic and cultural advancement of vulnerable and disadvantaged communities, including Indigenous peoples, through employment opportunities, financial education programs and by making our products and services fair and safe for our customers. We are not aware of any instances of involvement in violation of Indigenous people. Our Reconciliation Action Plan sets out our work to improve the social and economic inclusion of Indigenous Australians.</p> <p>About our approach to providing education & employment opportunities to under-represented and disadvantaged individuals, including indigenous people</p>

SOCIETY

SOCIETY

MANAGEMENT APPROACH

As a responsible corporation, ANZ seeks to have a positive impact in the communities where we operate and to make responsible and transparent business decisions using our robust policies, frameworks and tools. We understand that living in the world of our customers means actively engaging with and contributing to local communities and we support a variety of organisations through our [GIVE program](#) and our investment in [financial capability](#). In addition, our [risk management framework](#) and [Code of Conduct and Ethics Policy Framework](#) ensures a best practice approach to CORRUPTION, ANTI-COMPETITIVE BEHAVIOUR AND COMPLIANCE ISSUES.

COMMUNITY

Indicator	Description	Reported	Commentary
SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting	Fully	<p>Assessing and managing impacts of operations on customers and communities:</p> <p>We are committed to treating our customers fairly and we recognise our responsibility to provide responsible financial products and services to our customers and aim to make basic banking services more accessible to under-served or disadvantaged segments of the community.</p> <p>We recognise our responsibility to maintain strong lending guidelines and procedure to ensure credit is only provided to customers who have the capacity to repay the debt. We aim to provide practical, sensitive and helpful assistance to customers who are having difficulty making repayments on their loan.</p> <p>Our aim is to make balanced, informed and transparent decisions and work with our clients to help them improve their management of business, social and environment risks and to make the most of opportunities. Our approach is supported by clear policies and guidelines; screening tools and resources; and staff training and education. Our approach, and the decisions that we make are wherever possible informed by stakeholder engagement, and governed by our Reputation Risk</p>

SOCIETY

			<p>Committee.</p> <p>For all project financing transactions, we assess the project against the Equator Principles which includes a social (community) and environmental impact assessment, and ensures appropriate management systems are in place.</p> <p>Contributing to the world we live in:</p> <p>We understand that living in the world of our customers means actively engaging with and contributing to local communities. Our GIVE program, which stands for Giving, Investing, Volunteering and Emergency, highlights the ways we contribute to local communities by giving donations to charities, investing in partnerships with community organisations, volunteering our skills and time to support community causes and responding to emergencies through supporting disaster relief and recovery activities.</p>
FS13	Access points in low-populated or economically disadvantaged areas by type	Fully	<p>We are committed to providing customers with convenient and simple banking services. It is essential that we enable our customers with easy access to our branches and ATMs, and tailor our services to meet the needs and expectations of our customers, from all backgrounds across metropolitan, regional and rural areas.</p> <ul style="list-style-type: none"> ▪ Find out more about how we are improving the accessibility of our products and services across 1,300 branches and 4,000 ATMs worldwide. <p>In 2010, we extended our Saver Plus program to 60 communities across Australia. The expansion of the program has included a focus on communities identified by the Australian Government as more vulnerable to an economic downturn because of location, industry composition, demographic profile, skill mix and past economic performance.</p> <ul style="list-style-type: none"> ▪ Find out more about our Saver Plus program

SOCIETY

			<ul style="list-style-type: none"> ▪ Find out more about our approach to improving financial literacy and inclusion
FS14	Initiatives to improve access to financial services for disadvantaged people	Fully	<p>We are committed to providing customers with convenient and simple banking services. It is essential that we enable our customers with easy access to our branches and ATMs, and tailor our services to meet the needs and expectations of our customers, from all backgrounds across metropolitan, regional and rural areas.</p> <ul style="list-style-type: none"> ▪ Find out more about how we are improving the accessibility of our products and services across 1,300 branches and 4,000 ATMs worldwide. ▪ Find out more about the support we provide to concession card holders and people receiving Government benefits. ▪ About the support we provide to those caring for people with special needs. <p>We can also contribute to building individual prosperity by developing innovative programs that improve the financial capability of people on low-incomes and from disadvantaged groups including Indigenous communities. View the progress on our flagship initiatives:</p> <ul style="list-style-type: none"> ▪ Saver Plus ▪ MoneyMinded ▪ MoneyBusiness ▪ Progress Loans <p>Recognising our responsibility to provide responsible financial products and services to our customers and make basic banking services more accessible to under-served or disadvantaged segments of the community, we have developed a number of initiatives such as Banking the Unbanked.</p> <p>We also provide customers with sound advice and support and clear information to help them to make informed and effective decisions about the management of their money. We have</p>

SOCIETY

			established dedicated teams in Australia and New Zealand to offer customers timely, appropriate and sensitive support and assistance when facing financial hardship .
--	--	--	---

CORRUPTION

Indicator	Description	Reported	Commentary
SO2	Percentage and total number of business units analyzed for risks related to corruption	Fully	<p>The assessment, management and reporting of operational risks, including fraud & corruption, are completed, at least annually, by 100% of ANZ business units globally in line with the requirements of ANZ's Operational Risk Management & Measurement Policy, ANZ's Global Fraud & Corruption Policy and Global Anti-Bribery Policy. Risk and control management involves identifying and assessing material risks, including systemic risks, and the controls in place to manage these risks across the respective business unit risk profiles.</p> <p>Find out about our approach to:</p> <ul style="list-style-type: none"> ▪ Risk management ▪ Governance at ANZ ▪ Corporate Responsibility governance
SO3	Percentage of employees trained in organization's anti-corruption policies and procedures	Fully	<p>All ANZ staff are required to complete an annual training course, 'Living the Code', which covers the principles of our Code of Conduct and Ethics, including employee obligations in key areas such as fraud, corruption, anti-bribery, and equal employment opportunity, bullying and harassment. This confirms that each employee understands the Code's principles and has complied with them over the previous 12 months. This year we recorded a 98% completion rate for this essential training and compliance program. We track and report breaches of the Code annually.</p> <p>Every three years, all ANZ employees are required to complete a mandatory 'Preventing Fraud &</p>

SOCIETY

			<p>Corruption' training module which includes interactive case studies and scenarios to assist staff in identifying and reporting fraudulent activity.</p> <p>Find out more about our approach to:</p> <ul style="list-style-type: none"> ▪ Risk management ▪ Governance at ANZ ▪ Corporate Responsibility governance
SO4	Actions taken in response to incidents of corruption	Fully	In 2010, there were no incidents of corruption.

PUBLIC POLICY

Indicator	Description	Reported	Commentary
SO5	Public policy positions and participation in public policy development and lobbying	Fully	<p>We are an active participant in the political and public policy making process. Our approach is set out in our Public Policy Advocacy and Political Donations Policy.</p> <ul style="list-style-type: none"> ▪ About our approach to public policy advocacy.
SO6	Total value of in-kind contributions to political parties	Fully	<p>ANZ makes a single, annual donation (of \$100,000) to each of the two major Federal parties to support the democratic process of parliamentary government in Australia. Staff are not permitted to participate in political fundraising as representatives of ANZ. Our political donations are publicly disclosed each year in our annual report. We are also required to submit a political donation return</p>

SOCIETY

			to the Australian Electoral Commission. The return is disclosed publicly in our Annual Report. <ul style="list-style-type: none"> ▪ About our approach to public policy advocacy.
--	--	--	--

ANTI-COMPETITIVE BEHAVIOUR

Indicator	Description	Reported	Commentary
SO7	Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes	Fully	Group Governance is not aware of any incidents for the current reporting period (FY09/10).

COMPLIANCE

Indicator	Description	Reported	Commentary
SO8	Monetary value of significant fines and total number of non-monetary sanction for non-compliance with laws or regulations	Fully	Group Governance is not aware of any significant fines for the current reporting period (FY0910).

PRODUCT RESPONSIBILITY

PRODUCT RESPONSIBILITY

MANAGEMENT APPROACH

We aim to provide convenient and uncomplicated [products and services](#), tailored to the individual needs of our customers. This means striving to put customers first, looking after customers of all backgrounds, being easy to do business with, and providing value for money.

Further information:

- [Embedding responsible practices in everyday business](#)
- [Improving financial capability in our communities.](#)
- [Supporting customers facing financial difficulty](#)
- [Responsible customer lending](#)
- [Responsible business lending](#)
- [Supporting small business in Australia](#)
- [Increasing financial knowledge in New Zealand](#)
- [Our Global Product Management Policy](#)

CUSTOMER HEALTH AND SAFETY

Indicator	Description	Reported	Commentary
PR1	Health and safety impacts across life cycle of products/services	Fully	A new Global Product Management Policy provides clear guidelines for the development of safe, uncomplicated products – from the concept through to decommissioning. A supporting project is streamlining and simplifying the number of products we have to ensure they meet expectations, including those of customers and regulators.
PR2	Total number of incidents of non-	Not	We do not believe this indicator is relevant to ANZ's business. ANZ complies with laws and

PRODUCT RESPONSIBILITY

	compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes (additional)		regulations relating to the disclosure of information about the products and services we provide.
--	---	--	---

PRODUCT AND SERVICES LABELING

Indicator	Description	Reported	Commentary
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements	Fully	<p>ANZ complies with laws and regulations relating to the disclosure of information about the products and services we provide.</p> <p>We aim to provide convenient and uncomplicated products and services, tailored to the individual needs of our customers.</p> <p>A new Global Product Management Policy provides clear guidelines for the development of safe, uncomplicated products – from the concept through to decommissioning. A supporting project is streamlining and simplifying the number of products we have to ensure they meet expectations, including those of customers and regulators.</p> <p>Our website also includes easy to access information about fees, rates, taxes and terms, as well as calculators and tools to help our customers choose the products that are right for them.</p>

PRODUCT RESPONSIBILITY

			<ul style="list-style-type: none"> ▪ Product selectors and calculators ▪ More about our approach to customers
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes (additional)	Fully	In 2010, ANZ identified seven potential non-compliance issues. All of these matters were resolved to the satisfaction of the Australian Securities and Investments Commission (ASIC) and did not result in any significant fines. Appropriate remediation actions were put in place to respond to the matters raised.
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction (additional)	Fully	<p>We have set public targets to improve retail customer satisfaction in Australia & New Zealand. According to Roy Morgan Finance Monitor, ANZ retail customer satisfaction in Australia has increased from 76.5% in September 2009 to 79.9% in September 2010. We remain ahead of all major banks. According to research by AC Nielson, ANZ New Zealand retail customer satisfaction is 54% down from 61% in 2009. National Bank (NZ) is at 66%, up from 61% for the same period in 2009.</p> <ul style="list-style-type: none"> ▪ About our approach to our customers ▪ Our commitment to providing customers with efficient complaint resolution
FS16	Initiatives to enhance financial literacy by type of beneficiary	Fully	ANZ has made a significant investment over a number of years to help create innovative programs that are improving the financial capability of people on low incomes, women, migrants and people from disadvantaged groups, including Indigenous communities. These programs/initiatives include:

PRODUCT RESPONSIBILITY

			<ul style="list-style-type: none"> ▪ Saver Plus. ▪ Money Minded ▪ Money Business ▪ Progress Loans ▪ Be Money Confident ▪ ANZ's moving overseas portal
FS15	<p>Policies for the fair design and sale of financial products and services</p>	Fully	<p>We are committed to providing our customers with uncomplicated banking delivered in a responsible manner.</p> <ul style="list-style-type: none"> ▪ Our Customer Charter commits that we will provide our customers with simple, convenient, fair and affordable products and services, and provide a fast and effective response to customer complaints or concerns. ▪ Our new Global Product Management Policy provides clear guidelines for the development of safe, uncomplicated products – from the concept through to decommissioning. A supporting project is streamlining and simplifying the number of products we have to ensure they meet expectations, including those of customers and regulators. ▪ Our new Reputation Risk Policy highlights decisions that are particularly important to our reputation, like designing or approving a product, lending money to a new client or entering a joint venture with a third party. We have developed a series of policies that guide our engagement with customers in socially and environmentally sensitive sectors. ▪ View a full list of our Group-wide policies

PRODUCT RESPONSIBILITY

MARKETING AND COMMUNICATIONS

Indicator	Description	Reported	Commentary
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship	Fully	<p>ANZ complies with laws and regulations relating to the disclosure of information about the products and services we provide.</p> <p>ANZ's Customer Advocate is responsible for resolving disputes from retail and small business customers who have been through ANZ's internal complaints resolution process, and where the customer is not satisfied with the outcome. Read a message from the Advocate.</p> <ul style="list-style-type: none"> ▪ Find out more about our approach to customers
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes (additional)	Fully	<p>In 2010, ANZ identified an incident of non-compliance with regulations and voluntary codes concerning marketing communications in Australia. ASIC queried an advertisement promoting ANZ's fixed rate home loan which did not contain a comparison rate, resulting in a breach of section 160 of the National Credit Code. We have now implemented controls and procedures to avoid such incidents occurring in future. ASIC is satisfied with the action taken.</p>

PRODUCT RESPONSIBILITY

CUSTOMER PRIVACY

Indicator	Description	Reported	Commentary
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data (additional)	Fully	A privacy event is deemed to be an occurrence involving inappropriate disclosure that may cause the privacy of our customers to be impacted. In 2010, there were 78 identified and resolved against 169 in the previous year. We take privacy considerations seriously and believe that the work completed in this area has had a significant impact in decreasing the number of complaints.

COMPLIANCE

Indicator	Description	Reported	Commentary
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services	Fully	In June 2010, ANZ National Bank Limited (ANZ New Zealand) and ING (NZ) Limited (ING) announced that they had reached a settlement with the New Zealand Commerce Commission and the New Zealand Securities Commission in relation to the marketing and promotion of two certain ING funds. More than NZ\$540 million was made available to eligible investors in the two funds by ANZ National Bank Limited and ING (NZ). Both Commissions were satisfied with the arrangement. Group Governance is not aware of any significant fines for the current reporting period (FY0910) in Australia and APEA.