



Trading in Non ANZ Securities Policy Summary

Why does ANZ have this policy?

This policy provides a globally consistent approach to limiting trading in non ANZ securities by ANZ employees and contractors to avoid insider trading – the trading of securities while in possession of information significantly affecting the price or value of those securities.

How does this policy apply at ANZ?

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

The implementation of this policy is supported by global procedures and processes, and all employees and contractors complete mandatory annual training.

Breaches of this policy may lead to disciplinary action, including dismissal, and may also contravene insider trading or other laws, for which financial penalties and/or imprisonment may apply.

Key obligations

Under this policy employees and contractors will:

- not trade, or advise, procure or encourage another person to trade, in non-ANZ securities when they possess inside information in relation to those securities
- not trade in securities issued by those customers, third parties or entities with which the employee or contractor holds a relationship, up until 12 months after the relationship ceases
- maintain records of all trading in non ANZ securities for 12 months and provide them for ANZ inspection upon request.

Under this policy key personnel will:

- obtain written pre-trade approval before trading in non-ANZ securities.

Last reviewed: November 2013

Reviewed annually by: Group Compliance