



Anti-Bribery and Anti-Corruption Business Integrity Policy

At ANZ, we are dedicated to conducting our business with the highest standards of integrity and ethics. Our approach to anti-bribery and anti-corruption (ABAC) practices is governed by a robust ABAC Business Integrity policy (ABAC Policy) and Standards designed to ensure compliance with regulatory expectations across all jurisdictions where we operate.

This summary outlines the key principles and intent behind our ABAC Policy, demonstrating our commitment to transparency, fairness, and ethical business conduct.

1. Conducting Business with Integrity

We maintain a strict zero-tolerance stance against bribery and corruption. All staff, including employees, contingent workers, and directors, are required to avoid offering, giving, or receiving anything of value—including gifts, entertainment, travel, or donations—if it could improperly influence business decisions.

We prohibit facilitation payments under all circumstances and require that any requests for such payments be reported. Our aim is to ensure that personal interests never take precedence over ANZ's interests or the interests of our stakeholders.

2. Transparency in Financial and Ownership Interests

Transparency is fundamental to our operations. All staff and contingent workers are required to declare gifts, entertainment, sponsored travel, donations, grants, or sponsorships received or given, and to disclose any personal or related-party financial or ownership interests as appropriate.

Preferential treatment for related parties is not permitted. This principle ensures that all relationships and transactions are conducted openly and fairly.

3. Responsible Engagement with Third Parties

We expect our third-party partners—including agents, brokers, suppliers, and other service providers—to uphold ANZ's standards of business integrity. Before engaging with third parties, we conduct risk-based due diligence to assess potential risks and apply mitigation measures when necessary. Ongoing oversight and regular reporting help maintain accountability throughout these relationships.

4. Awareness and Training

ANZ is committed to fostering a culture of integrity through comprehensive training and awareness programs. All staff and contingent workers must familiarize themselves with our ABAC Policy and complete assigned training by designated deadlines. These programs are designed to meet both legal and ethical standards, equipping our team to recognize and prevent bribery and corruption.

5. Maintaining Accurate Records

Accurate record-keeping is essential to maintaining trust and transparency. We require that all payments, expenditures, and commercial information are properly documented in our books and records. False, misleading, or incomplete entries are strictly prohibited, ensuring our financial records accurately reflect our business activities.

6. Reporting and Addressing Concerns

We encourage immediate reporting of any suspected or observed breaches of our ABAC Policy. Multiple channels including reporting via management, compliance or risk representatives, and a dedicated Whistleblower program is available to facilitate confidential and, if desired, anonymous reporting.

We protect individuals who report concerns from retaliation or victimization and take all reports seriously, investigating and addressing them with diligence.

7. Continuous Improvement and Oversight

Our commitment to anti-bribery and anti-corruption is ongoing. ANZ maintains a centralized ABAC function, ensures sufficient resources are allocated, and regularly monitors business integrity risks.

We escalate significant issues to senior management and the Board, taking prompt action to resolve them and enhance our procedures as needed.

Our Intent

Through these principles, ANZ aims to foster a culture of integrity that supports fair markets, protects human rights, and avoids environmental harm. By upholding these standards, we strengthen public trust in the banking sector and contribute to a more transparent and ethical global economy.