

ANZ Employee Code of Conduct

ANZ aims to build sustainable value for shareholders by taking an integrated and responsible approach to business which acknowledges ANZ's shareholders, people, customers, and the communities and environments in which ANZ operates.

ANZ's Code of Conduct sets ethical standards for ANZ employees to embrace and advocate. ANZ also has company policies and charters which further support these standards. This ethical framework delivers an environment in which we, as ANZ employees, can excel regardless of race, religion, age, disability or gender. It is impossible to provide specific guidance for every circumstance, however if you are in doubt about whether your conduct is consistent with this code, a good test is to ask yourself; *"if my conduct in this circumstance were to be reported on the company intranet, how would I feel? How would my boss respond? How would my bosses' boss respond?"*

The following six principles govern our conduct, wherever ANZ operates.

1. Honesty and Integrity

I will not make statements, promises or commitments that I do not believe to be true or which I or ANZ do not intend, or are unable, to honour

- My conduct will be such that my honesty is beyond question.
- In all communications, I will adhere to the truth, and will not knowingly make false statements, nor mislead directly, indirectly or by omission.
- I will at all times deal fairly and in good faith with ANZ's customers, suppliers and competitors, as well as with work colleagues and other parties.
- I will treat all people with respect and will undertake my duties with care and diligence, and will uphold ANZ's Values.
- I will protect ANZ's reputation and assets.

2. Personal Transactions and Gain

My personal dealings will be kept separate from my business dealings

- I will not use the name of ANZ, nor any information obtained in the course of my employment or as a result of my position with ANZ, to further any personal transaction or gain.
- I will use goods, services and facilities provided to me by ANZ strictly in accordance with the terms on which they are provided, and will ensure that such goods and facilities are properly protected.

3. Confidentiality of Information

I will respect the privacy of others

- I will take care to ensure that confidential information relating to customers, work colleagues, suppliers and ANZ's operations is properly protected and not disclosed to third parties, unless allowed or required under relevant law or regulation.
- I will not use information obtained in the course of my employment or as a result of my position with ANZ for personal financial gain, nor allow that information be used to obtain financial benefit for any other person or company.

4. Conflict of Interest

My primary business loyalty is to ANZ

- I will immediately and fully disclose to my supervisor or line manager any personal matters that may lead to actual or perceived conflicts of interest.
- My dealings with customers, suppliers and other parties will always be at arm's length to avoid the possibility of actual or perceived conflicts of interest.

5. Abiding by the Law and this Code

I will abide by the law and this Code

- I will not take any action, nor allow any omission, that will breach any law or regulation (including insider trading laws) of the country in which I work.
- I will immediately report knowledge of any actual or potential breaches of the law or this Code to my supervisor, line manager or business unit compliance manager so that appropriate action can be taken.
- I understand that if I breach any law or provision of this Code, the breach will be investigated, which could result in disciplinary action, including termination of my employment with ANZ.
- I will comply with all statutory and internal disclosure requirements on a timely basis and if applicable to me, will ensure the full, fair, accurate and understandable, disclosure of matters in financial reports.

6. Payments, Gifts or Entertainment

I will not solicit, accept or offer any gift or entertainment in breach of this Code

- I will not use my employment status or position at ANZ to seek personal gain from those doing business or seeking to do business with ANZ, or from any other person or company.
- I will not accept any cash payments or cheques.
- I will not accept or provide any gift(s) or entertainment if such gifts or entertainment are provided in return for any consideration.
- I will not accept or provide any gift(s) or entertainment of any kind in circumstances that could be reasonably regarded as creating a business obligation on the donor, recipient or a third party.
- I will not accept or provide any gift(s) or entertainment that could reasonably be seen to be excessive or abnormal.
- I will not offer, promise or provide a bribe, in any form, to any person, either directly or indirectly, and I will not accept a bribe from any person.

How ANZ ensures that the Code is effective

- Group People Capital is responsible for ongoing review and development of this Code.
- Any breaches of this Code should be reported to Group People Capital, in accordance with the Group Compliance Incident Reporting Guide.
- Bi-annually, Heads of ANZ business units, corporate centre functions and functional heads report to Group Compliance using the Compliance Return. This process enables ANZ to identify whether ANZ business units are adhering to the principles in the Code.
- The Code of Conduct is made available to all ANZ staff. Particular concepts, including confidentiality of information, values and ethical standards and business loyalty are reinforced in ANZ contracts of employment, company policies and charters.