



## Whistleblower Protection Policy Summary

### Why does ANZ have this Policy?

ANZ has a strong values-based culture that encourages openness, integrity and accountability. The Corporations Act in Australia and similar legislation in other jurisdictions also require ANZ to protect whistleblowers.

The purpose of the ANZ Whistleblower Protection Policy is to encourage, support and promote honest and ethical behaviour by providing a framework for the escalation of 'Reportable Conduct' which is conduct that is dishonest, fraudulent, corrupt, illegal, in breach of local laws, unethical, an unsafe work practice or a repeated breach of ANZ policy or administrative procedures (including breaches of the Code of Conduct and Ethics).

### How does this Policy apply at ANZ?

This Policy is a level 2 Compliance Policy that applies to all ANZ Divisions and Business Units and has global application. This Policy applies to everyone working at ANZ, whether or not they are ANZ employees and extends to 3<sup>rd</sup> party vendors and service providers to ANZ. It allows directors, managers, employees, contractors and consultants to make a report and requires ANZ to protect them from being victimised as a consequence.

Under the Policy, reports are made by contacting either a designated Whistleblower Protection Officer (WPO) or the ANZ Whistleblower Hotline, managed by Deloitte – details below:

- Australia: 1800 997 448 (Toll Free)
- New Zealand: 0800 376 325 (Toll Free)
- Other International: +61 3 9667 3731
- Mail: ANZ Whistleblower Service, Reply Paid 12628, A'Beckett St, Victoria, Australia 8006
- QR access code (you will need a QR reader downloaded from the app store to use this link;



ANZ has two WPOs (Chief Compliance Officer and Group General Manager, Internal Audit) as well as two Alternate WPOs (General Manager, Compliance International and the Head of Group Investigations).

### Key obligations

Employees must:

- consider whether a matter can be more appropriately escalated or effectively addressed under another ANZ policy or process before making a report (e.g. to a line manager, HR, Risk, Compliance or Group Investigations)
- make reports in good faith
- report concerns about the resolution or the conduct of investigations of disclosures under the Policy to the Chief Compliance Officer
- not disadvantage or victimise another employee who makes a report
- Complete all relevant online training courses

### Role of Group Investigations – Policy administrator

The Head of Group Investigations is responsible for managing the implementation of the Policy, including ANZ's relationship with Deloitte. The role also;

- provides general awareness training for all employees

- provides assistance and role-based training to WPOs
- provides role-based training to Whistleblower Protection Champions (WPCs), who are responsible for being a point of contact in the business
- reports de-identified statistical information to Audit Committee and the Operational Risk Executive Committee about the number and type of Disclosures under the Policy in April and October of each year.