Whistleblower Policy

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1. Introduction

Topic: This document states ANZ's mandatory rules for managing whistleblower protections and provides information for potential whistleblowers on who can report under this Policy, the types of matters that can be reported and to whom, the process and the protections and support available.

Purpose: To ensure Eligible Persons can freely and without fear of detriment, raise concerns about misconduct or an improper state of affairs by or at ANZ.

This Policy and the Whistleblower Program support strong corporate governance and empower people by providing a safe, confidential (including anonymous) and accessible mechanism for Eligible Persons to raise concerns about misconduct without fear of retaliation in relation to the ANZ Group, including serious breaches of the Code of Conduct and breaches of law or policy. This, in turn, strengthens accountability, transparency and ethical decision-making across ANZ.

Early identification and escalation of concerns enables ANZ to address risks, protect customers and continuously improve practices, supporting ANZ's values and commitment to delivering fair customer outcomes and maintaining trust with stakeholders.

This Policy supports ANZ in meeting its obligations under the applicable whistleblower laws and regulations in the countries in which ANZ operates, including the *Corporations Act 2001* (Cth) and the *Tax Administration Act 1953* (Cth) ('applicable whistleblower laws').

This Policy, along with the Conduct Risk Framework and non-financial risk framework supports the management of Conduct Risk.

This Policy is available internally on MAX and externally on ANZ's website.

Application: This Policy applies to:

- Entities: ANZ Group
- People: Employees, Contingent Workers, Officers and Associates (including Directors or Company Secretaries) and Eligible Persons.
- Activities: Receipt, assessment and where appropriate investigation of Whistleblower Disclosures and Whistleblower protections and confidentiality obligations.

This Policy includes its presence schedules in Appendix A, as applicable to the relevant jurisdiction.

Roles and responsibilities applicable under this policy are set out in section 4.

2. ANZ's approach

ANZ's values guide how we work, make decisions and manage risk. Living our values helps protect our customers, people, shareholders and communities.

2.1 Principles

- ANZ expects you to speak up when you identify or suspect misconduct in relation to ANZ. It is an important expression of our values. If you are unsure whether behaviour constitutes misconduct or whether you should speak up, ask "should we?", not just "can we?", as guided by our Code of Conduct. When speaking up, consider the appropriate channel to raise your concerns (see section 3.1 below).
- If you are eligible to make a Whistleblower Disclosure under this Policy, you can remain anonymous although ANZ encourages you to identify yourself. This will allow ANZ to better protect you and investigate as appropriate.
- ANZ will protect you from detrimental conduct in connection with a Whistleblower Disclosure under this Policy.
- ANZ will treat all Whistleblower Disclosures confidentially and take reasonable steps to protect your identity in accordance with this Policy and the law.
- ANZ will conduct investigations fairly and in a timely manner in accordance with this Policy. ANZ will keep you informed on status and outcomes where appropriate.
- Where your concerns are covered by this Policy, you may communicate with regulators and law enforcement at any time in relation to those concerns or any matter relating to this Policy.

This document reflects ANZ's policy position on reporting misconduct in relation to ANZ. Please consult the relevant presence schedule for your jurisdiction for a summary of information about the operation of applicable whistleblower laws. In some circumstances, the Policy's scope may be broader than applicable whistleblower laws. This Policy and its presence schedules do not contain legal advice. Users of this Policy may wish to seek independent legal advice regarding the applicability of legislative whistleblower protections.

3. Policy requirements

3.1 Whistleblower Disclosures – eligibility requirements

Under this Policy, your concerns will be an eligible Whistleblower Disclosure if you meet the following three criteria:

- you are an Eligible Person
- you report your concerns to an Eligible Recipient
- your concerns are about Eligible Subject Matter.

3.1.1 Eligible Persons

An Eligible Person is a current or former:

- Employee, Contingent Worker, ANZ Group Officer (including a director or secretary) or associate of ANZ Group
- supplier of goods or services to ANZ Group, whether paid or unpaid (including employees of the supplier)
- a relative or dependant of any individuals mentioned above or a dependant of the individual's spouse.

3.1.2 Eligible Recipients

Eligible Recipients of Whistleblower Disclosures under this Policy and applicable whistleblower laws are ANZ's external reporting service, Other Eligible Recipients and Additional Eligible Recipients. Whistleblower Disclosures should be made directly to an Eligible Recipient to meet the 'eligible recipient' criterion for protection. These Eligible Recipients are outlined as follows:

- **ANZ's external reporting service** (Whistleblowing@ANZ, operated by Navex Global) is accessible by web form, mobile device or in some countries by telephone. All Whistleblower Disclosures received by this service are directed to ANZ's Whistleblower Program Team.

  If you wish to remain anonymous, please do not include information in your Whistleblower Disclosure that may identify you.

Website:	anz.ethicspoint.com
Mobile device:	anzmobile.ethicspoint.com or via this QR code:
Telephone:	Australia: 1800 154 231 (Toll Free) | New Zealand: 0800 466 434 (Toll Free) | China: 4001 200 346 | India: 011 7181 7044 | Indonesia: 021 3114 1490 | Philippines: 02 8271 2168 | Singapore: 8004 922 826.

- **Other Eligible Recipients (OERs):** Certain individuals at ANZ are eligible to receive Whistleblower Disclosures under this Policy. They are required to handle Whistleblower Disclosures in accordance with this Policy. These individuals are
  - officers of the ANZ Group
  - Group Executive Committee members
  - auditors, or members of an audit team conducting an audit, of an ANZ Group entity
  - an actuary of ANZ Group
  - in relation to tax-related disclosures, certain members of Group Tax.

  A disclosure can be made to an OER via email, phone, or in person. Please reach out to the Whistleblower Program team at whistleblowing@anz.com for contact details.

If the OER to whom you are raising your Whistleblower Disclosure is also your Manager or skip-line Manager, it is helpful for you make it clear that you are doing so in their capacity as an OER rather than in their role as your Manager or skip-line Manager. All Whistleblower Disclosures received by OERs will be referred to ANZ's Whistleblower Program Team.

- **Additional Eligible Recipients** may be authorised by ANZ to receive Whistleblower Disclosures from time to time. For ANZ Employees, a list of any Additional Eligible Recipients will be published on the Whistleblowing page on MAX.

Reporting to regulators and law enforcement

- Where your concerns are covered by this Policy, you may communicate with regulators and law enforcement at any time in relation to those concerns or any matter relating to this Policy.

3.1.3 Eligible Subject Matter

Concerns raised under this Policy are considered Eligible Subject Matter where you have reasonable grounds to suspect:

- misconduct or an improper state of affairs in relation to the ANZ Group, including:
  - illegal activities (such as insider trading, market manipulation, money laundering, cartel conduct, sexual assault, misreporting financial information, dealing in illicit drugs, violence or threatened violence, criminal damage against property)
  - serious or systemic breaches of internal ANZ policy, including serious breaches of the Code of Conduct (which may include sexual harassment), failing to disclose conflicts of interest, misuse of customer information
  - internal fraud or theft (such as misappropriating funds, falsifying loan or credit applications)
  - bribery or corruption (such as accepting or offering a bribe)
  - financial malpractice or irregularities
  - a breach of law or regulation
  - a breach of modern slavery or human rights standards
  - business behaviour and practices that may cause consumer harm or systemic issues (that the relevant regulator should know about to properly perform its functions), including the tax affairs of the ANZ Group
  - engaging in or threatening to engage in detrimental conduct against a person who has made a whistleblower report or is believed or suspected to have made or planning to make a Whistleblower Disclosure under this Policy
  - negligence, default, breaches of trust and breaches of duty
- matters that pose a significant risk to public safety or the stability or of confidence in the financial system even if those matters involve no breach of law.

For the avoidance of doubt, conduct which does not involve a breach of a particular law may still amount to Eligible Subject Matter.

Consistent with our values and Code of Conduct, ANZ expects you to do the right thing, act honestly and have reasonable grounds for suspecting reportable misconduct under this Policy.

The above list of matters sets out the scope of this Policy and may be broader than the scope of matters covered by the applicable whistleblower laws in relevant jurisdictions. Please note that disclosures about Eligible Subject Matters which are not within the scope of the applicable whistleblower laws will not qualify for protection under relevant law.

You can still qualify for protection in accordance with this Policy (and if applicable, relevant law) even if a Whistleblower Disclosure under this Policy turns out to be incorrect or unsubstantiated, provided there were reasonable grounds for suspicion.

However, knowingly making a Whistleblower Disclosure that is false or misleading is a serious matter and may result in disciplinary action. Any disciplinary action will depend on the severity, nature and circumstances of a false or misleading Whistleblower Disclosure.

3.1.4 Matters that do not qualify as Eligible Subject Matter under this Policy

Matters that generally do not qualify as Eligible Subject Matter under this Policy include:

- **Customer complaints**

  This Policy does not generally apply to customer complaints:

  - For ANZ customers, contact ANZ.
  - For Suncorp Bank customers, contact Suncorp Bank.

- **Personal work-related grievances**

  This Policy does not generally apply to personal work-related grievances.

  These are grievances relating to your employment (such as performance reviews, terms and conditions of your employment, promotion, transfer, or disciplinary matters) or an interpersonal conflict between you and another Employee. They have or tend to have personal implications for you and do not have significant implications for ANZ that do not relate to you. However, a disclosure about, or including, a personal-work related grievance may still qualify for protection under this Policy where it concerns matters covered by the applicable whistleblower laws or unlawful detrimental conduct.

  ANZ has dedicated channels to appropriately report and handle these matters. To find out more or to raise a personal work-related grievance, please refer to Report It! or contact ANZ's Employee Relations team via ANZ PeopleHub.

- **Policy breaches that are not serious or systemic**

  This Policy does not generally apply to breaches of internal ANZ policy or ANZ's Code of Conduct, other than serious or systemic breaches as assessed by ANZ and as outlined in section 3.1.3 above.

3.2 Whistleblower Disclosures - assessment, investigation and outcomes

3.2.1 Assessment

Once the Whistleblower Program receives your Whistleblower Disclosure, they will acknowledge receipt (where possible) and assess whether it meets the requirements under this Policy. One or more of your concerns may not be investigated if the same or similar concerns were investigated previously and there is no new material information.

A Whistleblower Program Team member assigned to your matter will contact you (where possible) to guide you through the process, request additional information or clarification if required, keep you updated and notify you of the outcome of the assessment.

Where your concerns do not meet the requirements in this Policy or is unable to be investigated, they can refer or assist you to refer your concerns to the appropriate channel.

Where a Whistleblower Disclosure meets the requirements in this Policy and proceeds to investigation, the Whistleblower Program will confirm consent (where not already chosen) and provide more information on your choice of consent (see section 3.3.2 below). They may also take these steps during the assessment phase if needed.

The Whistleblower Program will also consider conflicts of interest and risks in relation to your Whistleblower Disclosure (including whistleblower protections and wellbeing concerns), assign a Whistleblower Protection Officer and arrange for appointment and briefing of a Whistleblower Investigator.

3.2.2 Investigation and outcomes

The Whistleblower Program typically briefs Whistleblower Investigators from ANZ's Group Integrity or Employee Relations teams. At times other teams with the appropriate skills and subject matter expertise (internal or external to ANZ) may be briefed. The Whistleblower Investigation Team is briefed on their confidentiality obligations and whistleblower protections.

Timely, fair and impartial investigations

Investigations are conducted in a timely, fair, confidential and impartial manner. Whistleblower Investigators are required to act independently and competently and to treat all involved in an investigation of a Whistleblower Disclosure fairly. Each Whistleblower Disclosure is evaluated on its merits. The process, scope and timing of an investigation will depend on factors including the nature of the Whistleblower Disclosure, as well as whether further details are sought from and provided by you. Where appropriate and feasible, the Whistleblower Program aims to have investigations completed within approximately 90-120 days. Where an investigation takes longer than 90 days, the Whistleblower Program implements additional oversight steps to assist in bringing the matter to completion.

Engagement with you during the investigation

Your Whistleblower Disclosure will have a unique identifier (such as a report key or case number) so you can liaise with the Whistleblower Program to seek updates, provide information, answer questions, learn the outcome (where appropriate) and provide feedback to the Program. The Whistleblower Program will also provide you with periodic updates if you can be contacted. If you have submitted a Whistleblower Disclosure anonymously, please ensure you check back in with the Whistleblower Program to obtain this information.

If you have not provided consent to be contacted or if consent is declined or if you can't provide further information, this may limit ANZ's ability to investigate the matter. In some circumstances, this may mean an investigation is not possible. If this is so, the Whistleblower Program will notify you.

Fair treatment of investigation participants

The Whistleblower Investigator, where necessary and subject to confidentiality obligations, may also need to speak to others who may have relevant information.

ANZ will ensure the fair treatment of individuals mentioned in or to whom the Whistleblower Disclosure relates by handling Whistleblower Disclosures under this Policy confidentially and sensitively, and in accordance with this Policy, including in the context of employees' participation in any investigation or similar process. Where appropriate, individuals who are accused of misconduct in a Whistleblower Disclosure (a Respondent) will:

- have their identity as the subject of the Whistleblower Disclosure kept confidential to the extent reasonably practicable and appropriate and subject to any requirements under law, this Policy and any other applicable ANZ policies
- have an opportunity to respond to allegations made against them before any adverse findings of fact in relation to such allegations in any investigation are made and, for Employee Respondents, before any disciplinary action (if appropriate) is taken
- be advised of the outcome of an investigation, where ANZ considers appropriate.

Findings, Documentation and Storage

The method and format for documenting and reporting the findings of any investigation – including the recipients of the findings - will depend on the nature of the Whistleblower Disclosure. The Whistleblower Disclosure and any investigation records will be securely retained.

Request for Chief Compliance Officer Review

If you are not satisfied that your Whistleblower Disclosure has been investigated and acted upon appropriately, you may contact the Chief Compliance Officer to request a review. Where a request to review a matter is made and the Whistleblower Protection Officer assigned to the matter is the Chief Compliance Officer, the request should be made to the Group General Manager of Internal Audit.

ANZ is not obliged to reopen an investigation and can conclude a review if it finds that the investigation was conducted properly or new information is either not available or would not change the findings of the investigation. You may lodge a complaint with a relevant regulator, such as ASIC, APRA or the ATO, if you are not satisfied with the outcome of ANZ's investigation or where there has been a breach of your whistleblower legal protections. ANZ also encourages you to contact the Chief Compliance Officer if you have a complaint about a breach of your whistleblower legal protections.

3.3 Whistleblower Disclosures – protections and support

When you make an eligible Whistleblower Disclosure under this Policy, ANZ will take reasonable steps to protect you (and others involved in an investigation into your Whistleblower Disclosure) from detrimental conduct and protect your identity (including identifying information) in accordance with your consent, this Policy and the law.

Where you make a Whistleblower Disclosure under this Policy, this Policy's protections apply to you regardless of whether the concerns are substantiated, provided you are acting honestly and made the Whistleblower Disclosure on reasonable grounds.

ANZ also offers free, confidential, short term wellbeing support for Eligible Persons.

You may wish to obtain independent legal advice on applicable laws and protections in relation to your Whistleblower Disclosure.

3.3.1 Protection from detrimental conduct

ANZ does not tolerate detrimental conduct (whether acts or omissions and including threatened detriment) towards you because of a belief or suspicion that you or someone else has, may, proposes to or could make a Whistleblower Disclosure or has or will be involved in an investigation of a Whistleblower Disclosure made under this Policy.

The Whistleblower Program will assess, monitor and control the risk of detriment in connection with your Whistleblower Disclosure. ANZ will take all other reasonable steps to protect you (and others participating or assisting) in the investigation of your Whistleblower Disclosure) from detrimental conduct. Reasonable steps may vary depending on the circumstances, but may include changing your team, office location or reporting line temporarily or permanently.

Detrimental conduct includes:

- retaliation, dismissal, suspension, demotion or employment or engagement with ANZ otherwise terminated
- harassment, threats or intimidation
- discrimination, being subjected to current or future bias, or derogatory treatment
- injury or harm, including psychological harm
- damage or threats to an individual's property, business, financial position or reputation
- threatening to carry out any of the above actions.

Detrimental conduct does not include:

- managing poor work performance per ANZ's performance management processes
- disciplinary measures in relation to misconduct (including for knowingly false or misleading Whistleblower Disclosures made under this Policy)
- taking steps appropriate to protect an individual from detrimental conduct (for example, changing teams, office location or reporting line).

If someone at ANZ or a supplier to ANZ, engages in detrimental conduct against you, please immediately contact the Whistleblower Program or your Whistleblower Protection Officer. If the detrimental conduct involves the Whistleblower Program or Whistleblower Protection Officer, please contact the Chief Compliance Officer (or if conflicted, the Group General Manager, Internal Audit). You can also seek independent legal advice or contact an applicable regulatory body if you believe you have suffered detriment.

It is important to immediately report any detriment to the Whistleblower Program, your Whistleblower Protection Officer, the Whistleblower Investigator or the Chief Compliance Officer to help ANZ better protect you. Reports of detrimental conduct will be treated confidentially. Involvement of any kind in actual or threatened unlawful detriment is an offence. Anyone engaging in detrimental conduct may be subject to serious consequences, including disciplinary action or termination of employment, engagements or contracts, as applicable. They may also be subject to civil and criminal penalties.

3.3.2 Identity protection

When you make a Whistleblower Disclosure under this Policy, you can choose to disclose your identity (and identifying information) on a confidential basis or remain anonymous. The Whistleblower Program will provide more information on your choice of consent where appropriate.

Regardless of any consent you give, ANZ has obligations to keep information in relation to your identity and your Whistleblower Disclosure confidential in accordance with this Policy and the law. An Officer or Employee or Contingent Worker of ANZ Group must not make any unauthorised disclosure of a Whistleblower's identifying information. Where your Whistleblower Disclosure is protected at law, this type of unauthorised disclosure is illegal. Refer to your jurisdiction's Presence Schedule for further details, as applicable.

Consent options

- **Option 1: Specific consent to disclose (confidential consent)**

This means you consent to the disclosure of your identity (and identifying information) on a confidential basis in relation to your Whistleblower Disclosure to relevant individuals and bodies where, in ANZ's view, such disclosure is appropriate or necessary for one or more of the following purposes:

- assessing or examining the issues raised in your Whistleblower Disclosure
- investigating, handling, addressing or otherwise acting on matters in connection with your Whistleblower Disclosure (including, where relevant, making referrals or reports to regulatory, government or law enforcement agencies in relevant jurisdiction(s))
- ANZ taking steps to support non-victimisation of you or others
- oversight and governance
- ANZ considering or actioning any outcomes arising in connection with your Whistleblower Disclosure
- keeping stakeholders updated on the status of matters relating to your Whistleblower Disclosure, including in relation to outcomes.

Providing specific consent means ANZ is best placed to handle your Whistleblower Disclosure and matters arising in connection with it, provide you with ongoing protection and support and to act appropriately and in accordance with the law.

Practical steps to protect your identity

Practical steps ANZ may take to protect confidentiality and limit unnecessary disclosure of your identity can include:

- referring to you using gender-neutral language
- removing potentially identifying information from written material
- consulting with you on further measures that might be taken to maintain confidentiality.

For legal and regulatory reasons, where your identity is known to ANZ, ANZ may disclose your identity to lawyers, regulators or law enforcement authorities, regardless of the level of consent provided. In some cases, ANZ may also need to disclose information likely to identify you where it is reasonably necessary for the purposes of an investigation and where reasonable steps have been taken to protect your identity.

- **Option 2: Anonymous**

This means you choose not to identify yourself to ANZ. You can choose to do so indefinitely.

If you wish to remain anonymous:

- it is important you keep in touch with ANZ so we can ask follow-up questions, provide updates, answer your questions, inform you of any challenges (including those arising due to anonymity) and provide support
- you can refuse to answer questions that may reveal your identity. This includes in follow up conversations or responding to requests for additional information.
- it may not be possible to investigate concerns fully, in part or at all or appropriately act on matters raised or take reasonable steps to protect you from detrimental conduct. We will raise this with you if these circumstances arise.
- you may instead choose specific consent to disclose (confidential consent) to disclose your identity at any time by sending a message providing this consent to the Whistleblower Program Team or advising the allocated Whistleblower Protection Officer or Whistleblower Investigation Team.

Practical steps to protect your identity

Practical steps ANZ may take to protect your identity include:

- communicating through ANZ's external service provider anonymously or using an anonymised email address
- limiting interviews with you to phone interviews and information gathering to anonymised email or via the external reporting service, as appropriate
- not taking deliberate steps to identify you during the handling of the matter.

To assist with protecting your identity, please don't share details of the matter, your Whistleblower Disclosure or related information provided to you by ANZ with others outside of the Whistleblower Program. This is not intended to limit the protections available to you in respect of disclosures covered by the applicable whistleblower laws.

3.3.3 Whistleblower support

- **Support for ANZ Employees**

For ANZ Employees and their immediate families who have made a Whistleblower Disclosure or are thinking about making a Whistleblower Disclosure and wish to seek support, the Employee Assistance Program (EAP) provides free, confidential, short term wellbeing support services by qualified professionals face to face, over the phone or over the internet.

Your assigned Whistleblower Program Team member will provide further information on support available, if desired.

- **Support for non-ANZ Employees**

For non-ANZ Employees based in Australia, who have made a Whistleblower Disclosure and wish to seek support, the ANZ Whistleblower Support Program provides free, confidential, short term wellbeing support services by qualified professionals over the phone. Contact your assigned Whistleblower Program Team member for more information.

Your assigned Whistleblower Program Team member will provide further information on the support available, if desired.

- **Independent legal advice**

ANZ applies the standards under this Policy. However this does not extend to providing independent legal advice as to the application of the law and protections under the law for your specific circumstances. We encourage you to seek independent legal advice in these circumstances.

For information on jurisdiction-specific whistleblowing laws, see Appendix A below.

3.4 Conflicts management

Those with roles and responsibilities set out in section 4 of this Policy must disclose any actual, potential or perceived conflicts of interest they have in relation to a Whistleblower Disclosure made under this Policy. These disclosures must be assessed and managed consistent with ANZ's Conflict of Interest Policy.

4. Roles and responsibilities

Role	Responsibilities
ANZ Group Officers and Employees	• Comply with the requirements of this Policy as it relates to them • Do not engage in detrimental conduct • Do not make an unauthorised disclosure of identity of a whistleblower if become aware or suspect their identity • Complete required training
Eligible Recipients (generally)	• Receive Whistleblower Disclosures and maintain confidentiality of identity and Whistleblower Disclosures in accordance with this Policy and the law.
Other Eligible Recipients (OERs)	• Receive Whistleblower Disclosures, obtain consent from the Eligible Person where possible and appropriate and refer the Whistleblower Disclosure to the Whistleblower Program for assessment (or where required, seek legal advice on the operation of the whistleblower provisions of applicable laws) • Maintain confidentiality of identity and Whistleblower Disclosures in accordance with this Policy and the law • Immediately report detrimental conduct concerns to the Whistleblower Program • Complete required role-specific training
Whistleblower Program Team (Lines 1A, 2)	• Maintain confidentiality of identity and Whistleblower Disclosures in accordance with this Policy and the law • Receive Whistleblower Disclosures, determine whether a Whistleblower Disclosure falls within the scope of the Policy and should be investigated and if so, assess risks and appoint a Whistleblower Protection Officer (who may be the Whistleblower Program adviser assigned to a case) and a Whistleblower Investigator • Assist Whistleblower Protection Officers with overseeing whistleblower investigations to manage whistleblower protections, reassess risks as required and ensure integrity of the Whistleblower Program is maintained, including ensuring any recommendations to act have been made to the relevant stakeholders • Provide support and periodic updates to Eligible Persons • Report to Board and/or Executives periodically and as required for oversight purposes • Remain impartial and disclose conflicts • Maintain a secure restricted central repository of Whistleblower Disclosures made under this Policy • Complete required role-specific training
Whistleblower Protection Officer (WPO) (Line 1A)	• Maintain confidentiality of identity and Whistleblower Disclosures in accordance with this Policy and the law • Immediately report detrimental conduct concerns to the Whistleblower Program • Review Whistleblower Disclosures and approve risks and proposed approach • Oversee whistleblower investigation to manage whistleblower protections and ensure integrity of the Whistleblower Program is maintained (with assistance from the assigned Whistleblower Program adviser) • Remain impartial and disclose conflicts • Complete required role-specific training
Whistleblower Investigation Team (WI) (Line 1A)	• Maintain confidentiality of identity and Whistleblower Disclosures in accordance with this Policy and the law • Immediately report detrimental conduct concerns to the Whistleblower Program • Investigate Whistleblower Disclosures in accordance with their appointment and this Policy in a timely and fair manner • Advise the Whistleblower Program and Whistleblower Protection Officer if, at any time, immediate consideration or action is required to stop, prevent, or mitigate the reported misconduct or any other identified concerns • Remain impartial and disclose conflicts • Take steps to protect or preserve evidence and maintain accurate complete records of the investigation in secure location • Complete required role-specific training
Senior Manager Whistleblower Program (Policy Owner) (Line 2)	• Develop, maintain and communicate obligations under this Policy • Oversee compliance with requirements under this Policy • Review and approve Policy exemptions and local Whistleblower Policies or jurisdiction-specific amendments in line with the Policy Governance Policy • Monitor and assess the effectiveness of this Policy and Program

Business Operations Owners (Line 1A)	• Embed whistleblower requirements into business processes • Ensure whistleblower protections are managed in accordance with this Policy and law • Support investigation and remediation of whistleblower protection incidents within their area.
People Leaders (Line 1A)	• Promote awareness and encourage use of whistleblower channel within their teams • Ensure completion of required training
Line 2	• Independently advise, oversee and challenge Line 1 risk management practices (subject to whistleblower protections and confidentiality requirements) • Set and maintain risk and compliance frameworks and policies • Recommend risk appetite, including metrics • Monitor adherence and provide independent review and challenge of risk management
Line 3	• Independently review and assure the effectiveness of risk management (subject to whistleblower protections and confidentiality obligations) • Evaluate the adequacy and effectiveness of governance, risk management and controls across Line 1 and Line 2 • Provide independent and objective assurance that controls are operating effectively
Chief Risk Officer	• Approve changes to this Policy • Oversight effectiveness of this Policy and the Whistleblower Program
Group Board Audit Committee (Governance body)	• Oversight effectiveness of this Policy and the Whistleblower Program

5. Compliance

Failure to comply with this document may lead to disciplinary action and may affect performance and remuneration outcomes.

Potential or realised breaches of this Policy must be escalated and managed according to the Event Management Standard.

A breach of this Policy must be immediately escalated to the Policy Owner. A breach of this Policy is considered a breach of the ANZ Code of Conduct and may have serious consequences including termination of employment, engagement or services, where appropriate. Breaches may also result in potential harm to customers and loss of trust in the markets in which we operate. Any incidents and alleged potential or actual breaches in relation to this policy must be managed in accordance with the relevant non-financial risk framework (subject to whistleblower protections and confidentiality obligations). ANZ will apply the Performance Improvement and Unacceptable Behaviour Policy to employees in determining the consequences of the breach.

All Policy exemptions must be submitted for approval to the owner using the Policy Exemption Form.

This Policy is not part of employee contracts and may be changed or retired at any time. If the law imposes a higher standard than this document, the legal obligation prevails.

6. Definitions

Terms are defined in the Policy glossary. The following terms are defined for the purposes of this document.

Term	Definition
Whistleblower Investigation Team	The team responsible for investigating Whistleblower Disclosures as briefed by the Whistleblower Program Team. Team members include a Whistleblower Investigator, their manager and skip line manager.
Whistleblower Program Team	The team responsible for assessing and managing Whistleblower Disclosures made under this Policy (where not conflicted). Team members comprise the Senior Manager Whistleblower Program, their direct reports and their manager (Chief Compliance Officer). If conflicted, whistleblower reports made under this Policy will be managed by legal.

7. Document information

Effective date	2 November 2026
Next review date	2 November 2028
Approver	Chief Risk Officer
Owner	Senior Manager Whistleblower Program
Review cycle	Every 2 years
Contacts	Senior Manager Whistleblower Program at Whistleblowing@anz.com

8. Related documents

This document forms part of the following document hierarchy:

Framework	Conduct Risk Framework
Policy	Whistleblower Policy

This document must be read in conjunction with these related documents

1. Code of Conduct
2. Conduct Risk Framework

9. Document history

Version	Approval date	Effective date	Summary of changes
2.1	19 July 2024	31 July 2024	*Incorporate Suncorp Bank and minor amendments, including to some country schedules.*
2.2	3 March 2025	1 April 2025	*Replace external reporting service, clarify whistleblower protections and confidentiality obligations and minor amendments.*
2.2	25 August 2025	26 August 2025	*Minor administrative amendments.*
2.3	24 April 2026	25 June 2026	*Minor amendments, including to some country schedules.*
3.0	5 October 2026	2 November 2026	*Two-year review - material updates to more closely align to applicable legislation, Whistleblower Program team current practice, to reflect refreshed ANZ values, Code of Conduct and Conduct Risk Framework and minor amendments, including to some country schedules.*

Appendix A: ANZ Presence Schedules

1. Australia

This schedule sets out a summary of the legal protections that may be available under Australian law. ANZ will apply the standards set out in the Policy. Some aspects of the Policy are broader than the legal protections available under Australian law. ANZ is unable to advise you on how the law will apply to your specific circumstances. If you require further information on the application of the law, please seek independent legal advice.

Section 3.1 of this Policy – qualifying reports

Eligibility for statutory protections under Australian law

The *Corporations Act 2001* (Cth) at Part 9.4AAA (Corporations Act Regime) and the *Taxation Administration Act 1953* (Cth) at Part IVD (Tax Regime) provide special protections to eligible whistleblowers who make disclosures that qualify for protection under that regime (Statutory Protections). Some of the terms used in this section have specific definitions under relevant legislation, which may or may not be indicated below.

In this schedule:

- **'ANZ Extended Group'** comprises all ANZ Group entities, including Excluded Entities and entities that do not meet the Threshold (each as defined in the Policy Glossary).
- For purposes of the Corporations Act Regime, **'ANZ Entities'** means only those ANZ Extended Group entities that are incorporated entities or superannuation entities.

The Policy's preceding sections 1-9 apply to the ANZ Extended Group, including in respect of how the ANZ Extended Group will:

- support whistleblowers and protected them from detriment;
- investigate statutory protected disclosures;
- ensure fair treatment of its employees who are mentioned in statutory protected disclosures;
- make the policy available to officers and employees.

The Statutory Protections will be available in Australia under law if each of the following conditions is satisfied in relation to a disclosure (Whistleblower Disclosure):

Corporations Act Regime

(1) **Eligible whistleblower:** In relation to a particular ANZ Entity, you are a current or former
  - employee, individual who is a Contingent Worker, Officer (including a director or secretary) or individual who is an associate
  - individual who is a supplier of goods or services, whether paid or unpaid (including employees of a supplier of goods or services)
  - ***For superannuation entities only*** – individual who is a trustee, custodian, or investment manager of the entity, or: their employee, an individual who supplies goods or services to them (paid or unpaid), or an employee of a supplier to them (paid or unpaid); an officer or employee of a body corporate that is a trustee, custodian or investment manager of the superannuation entity, an individual who supplies goods or services to it (paid or unpaid), or an employee of a supplier to it (paid or unpaid)
  - relative or dependant of any individuals mentioned above (or a dependant of the individual's spouse).

(2) **Eligible recipient:** Your report is made to any of the following:
  - A person authorised by ANZ under section 3.1.2 of this Policy to receive Whistleblower Disclosures, including the external whistleblower reporting service (Whistleblowing@ANZ, operated by Navex Global)
  - ***For disclosures about ANZ Extended Group incorporated entities only*** - officers and senior managers of the ANZ Entities, including directors and company secretaries; an internal or

external auditor of the ANZ Entities or a member of an internal or external audit team conducting an audit of the ANZ Entities or an actuary of the ANZ Entities
- *For disclosures about ANZ Extended Group superannuation entities only* - officers of the entity, including directors and company secretaries; an internal or external auditor of the entity or a member of an internal or external audit team conducting an audit of the entity; an actuary of the entity; a trustee of the entity; a director of the entity's corporate trustee
- ASIC, APRA or another Commonwealth body prescribed by regulation. Further information is publicly available on the relevant bodies' websites.

(3) **Eligible report subject matter:** You have reasonable grounds to suspect that the information you are disclosing
- concerns misconduct or an improper state of affairs or circumstances in relation to the ANZ Entity (or a related body corporate)
- indicates the relevant ANZ Entity (or a related body corporate), or an officer or employee of that Entity, has engaged in conduct that constitutes an offence against or a contravention of a specified Commonwealth law or instrument (as defined in the Corporations Regime) or which otherwise constitutes an offence against any other law of the Commonwealth that is punishable by 12 months' imprisonment or more
- represents a danger to the public or the financial system.

Section 3.1.3 of this Policy sets out the types of conduct that will be treated as within scope of this Policy. Disclosures that do not concern the above matters will not qualify for the Statutory Protections, however you may receive certain protections under other legislation such as the *Fair Work Act 2009* (Cth).

(4) **Excluded subject matter:** The Whistleblower Disclosure does not concern a personal work-related grievance within the meaning of section 1317AADA of the *Corporations Act 2001* (Cth), which does not have significant implications for the ANZ Entities that do not relate to you, does not concern actual or alleged conduct of the kind referenced at item (3) above as relevant and does not concern actual or threatened unlawful detriment within the meaning of section 1317AC of the *Corporations Act 2001* (Cth).

Tax Regime

(5) **Eligible whistleblower:** In relation to a particular entity within the ANZ Extended Group, you are a current or former:
- employee, individual who is a Contingent Worker, Officer (including a director or secretary) or individual who is an associate
- individual who is a supplier of goods or services, whether paid or unpaid (and employees of a supplier of goods or services)
- relative (specifically, a spouse or child) or dependant of any individuals mentioned above (or a dependant of the individual's spouse).

(6) **Eligible recipient:** Your report is made to any of the following:
- A person authorised by ANZ under section 3.1.2 of this Policy to receive Whistleblower Disclosures, including the external whistleblower reporting service (Whistleblowing@ANZ, operated by Navex Global)
- officers and senior managers of the relevant ANZ Extended Group entity, including directors and company secretaries; any employee or officer of the relevant ANZ Extended Group entity who has functions or duties that relate to its tax affairs; a registered tax agent or BAS agent who provides tax agent or BAS services to the relevant ANZ Extended Group entity; for a relevant ANZ Extended Group trust, a trustee; for a relevant ANZ Extended Group partnership, a partner; or the Commissioner of Taxation, the Tax Practitioners Board or the Inspector General of Taxation. Further information is publicly available on relevant bodies' websites.

(7) **Eligible report subject matter:**
- in respect of disclosures to eligible recipients other than the Tax Practitioners Board or the Commissioner, you have reasonable grounds to suspect that the information you are disclosing indicates misconduct or an improper state of affairs or circumstances in relation

to the tax affairs of the relevant ANZ Extended Group entity or an associate of it and you consider the information may assist the eligible recipient to perform functions or duties in relation to such tax affairs

- you disclose information to the Tax Practitioners Board or the Commissioner that you consider may assist that recipient to perform its functions or duties under specified legislation (or an instrument, if applicable) in relation to the relevant ANZ Extended Group entity or an associate of it.

Section 3.1.3 of this Policy sets out the types of conduct that will be treated as within scope of this Policy. Disclosures that do not concern the above matters will not qualify for the Statutory Protections, however you may receive certain protections under other legislation such as the *Fair Work Act 2009* (Cth).

You will also be protected if you make a disclosure to a lawyer for the purposes of receiving legal advice or representation in relation to the operation of the Corporations Act Regime or Tax Regime (even if the legal practitioner concludes that the Statutory Protections under that Regime are not available, for example if your concern is an excluded personal work-related grievance).

Under the Tax Regime, you will also be protected if your disclosure is made to a prescribed entity of which the discloser is a member for the purpose of obtaining assistance regarding the operation of the Tax Regime or to a medical practitioner or psychologist for specified care-related purposes.

Where you are seeking legal advice, please approach an independent lawyer and not a lawyer who works for ANZ Extended Group.

If you meet the above criteria, the Statutory Protections are available to you even if you make the report anonymously.

Public interest disclosures and emergency disclosures

Statutory Protections under the Corporations Act Regime may also be also available if you make a public interest or emergency disclosure to a journalist or member of Parliament. It is important to understand the criteria for making a public interest disclosure or an emergency disclosure, which are set out below:

PUBLIC INTEREST DISCLOSURE	EMERGENCY DISCLOSURE
A previous disclosure which qualifies for protection (under Corporations Act 2001 (Cth) section 1317AA(1)) has been made to ASIC, APRA or a prescribed Commonwealth body	
At least 90 days has passed since making the previous disclosure	(No wait period)
You do not have reasonable grounds to believe that action is being or has been, taken to address the matters raised in the previous disclosure	(No equivalent criterion)
You have reasonable grounds to believe that...	
...making a further disclosure of the information in accordance with the public interest disclosure requirements would be in the public interest	...the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment
You give the body to which the previous disclosure was made a written notification that includes sufficient information to identify the previous disclosure and states that you intend to make...	
...a public interest disclosure	...an emergency disclosure
You then make the disclosure to a journalist, or a member of: the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory	
The extent of the information disclosed is no greater than is necessary to inform that recipient of the...	
...misconduct or improper state of affairs or circumstances or other prescribed conduct	...substantial and imminent danger

You should seek independent legal advice before seeking to make a public interest or emergency disclosure.

3.3 Statutory protections provided

The Statutory Protections – including all qualifying reports outlined at section 3.1 of this schedule – are as follows:

These protections apply under both the Corporations Act Regime and the Tax Regime, unless otherwise specified:

- protection from unlawful detrimental conduct extends to individuals where that or any other individual is who are believed or suspected to: have made; propose to make; potentially have made; or could make a protected disclosure under those respective whistleblower regimes and the belief or suspicion is part or all of the reason for the conduct. Protection from unlawful intentional or reckless threatened detriment extends to individuals to whom any unlawful threat is made because a person makes or may make a protected disclosure under those respective whistleblower regimes. Involvement of any kind in actual or threatened unlawful detriment is an offence and damages and/or civil penalties may also apply
- a person who, directly or indirectly because of your Whistleblower Disclosure, obtains information which is either (a) your identity or (b) information likely to lead to your identification (**Confidential Information**), commits an offence if they disclose that Confidential Information unless one of the following exceptions applies:
  - the disclosure of Confidential Information is made with your consent
  - the disclosure of details likely to lead to your identification (other than your identity itself) is reasonably necessary for the investigation of the matter to which the Whistleblower Disclosure relates and all reasonable steps are taken to reduce the risk of your identification as a result of that disclosure (in respect of Tax Regime matters, this only applies where the report relates to misconduct or an improper state of affairs or circumstances)
  - *in respect of Corporations Act Regime disclosures* – the disclosure of the Confidential Information is to ASIC, APRA, a member of the AFP or a person or body prescribed by regulation (noting certain further authorisations apply to ASIC, APRA and the AFP in respect of disclosures they may respectively make to relevant authorities)
  - *in respect of the Tax Regime disclosures* – the disclosure is made to the Commissioner of Taxation, a member of the AFP, the Tax Practitioners Board, the Inspector-General of Taxation, the Commissioner of the Australian Charities and Not-for-profits Commission or any other prescribed person or entity
  - the disclosure of the Confidential Information is made to a lawyer for the purpose of obtaining legal advice or representation in relation to the operation of the relevant statutory whistleblower regime(s)
- you are protected from civil liability for making the Whistleblower Disclosure (for example, any legal action against you for breach of an employment contract, duty of confidentiality or another contractual obligation from making the report)
- you are protected from criminal liability for making the Whistleblower Disclosure (for example, attempted prosecution of you for unlawfully releasing information or other use of the disclosure against you in a prosecution, other than for making a false disclosure)
- you are protected from administrative liability for making the Whistleblower Disclosure (for example, disciplinary action for making the disclosure)
- other protections that apply are that no contractual or other remedy or right may be respectively enforced or exercised against you on the basis of the disclosure; in respect of protected disclosures to certain regulatory bodies and external persons, the information is not admissible as evidence against you in criminal or penalty-related proceedings (other than in respect of falsity of the information); and that the discloser's Confidential Information is not required to be disclosed or produced to a court or tribunal except in certain circumstances.

The Statutory Protections do not grant civil, criminal or administrative immunity for any misconduct you have engaged in that is revealed by your disclosure.

Compensation for detrimental conduct

You (or any other employee or person) may be able to seek compensation and other legal remedies in relation to ANZ if you (or any other employee or person) suffer loss, damage, or injury because of detrimental conduct (described above and where applicable, at section 3.3.1 of this Policy) and ANZ failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

2. Fiji

Further requirements

In addition to the Policy, please note the following if you are reporting from Fiji or your concern or report relates to the ANZ Group's business in Fiji:

Section 3.1.2 – reporting to regulators

A reminder that you are entitled to escalate your report or raise your concern directly to the below regulators/agencies at any time:

- Reserve Bank of Fiji (RBF): Phone: (679) 331 3611| Email: info@rbf.gov.fj |Website: https://www.rbf.gov.fj/Contact-Us-Feedback
- FIJI FINANCIAL INTELLIGENCE UNIT: Phone: (679) 322 3333| Email: info@fijifiu.gov.fj | Web site: https://www.fijifiu.gov.fj/Contact-Us.aspx
- Fiji Independent Commission Against Corruption: Phone: (679) 331 0290| Email: info@ficac.org.fj | Website: https://ficac.org.fj

Fiji Policy administration

A copy of this Policy and any revisions will be submitted to the RBF within 30 days after the changes have been approved by the ANZ Board.

3. France

Further requirements

In addition to the Policy, the following provisions apply where a report is made from France (i.e., ANZ Paris branch or ANZ Europe S.A) or your concern or report relates to the ANZ Group's business in France:

Section 3.1.2 – reporting to regulators

A reminder that you are entitled to raise your concerns and make a report directly to the relevant French regulators, regardless of whether you have already made an internal report under this Policy.

For concerns pertaining to banking activities, you can contact the Autorité de Contrôle Prudentiel et de Résolution (**ACPR**). In addition, for ANZ Europe S.A., for any concerns relating to financial markets, you can contact the Autorité des Marchés Financiers (**AMF**).

Contact information

The ACPR and the AMF provide secure reporting channels (postal mail, online form or telephone hotlines) that ensure strict confidentiality. These channels also allow for anonymous reporting.

ACPR:

- Post: Secrétariat général de l'Autorité de contrôle prudentiel et de résolution, SAIDP – Signalements, 75436 PARIS CEDEX 09, FRANCE
- Online : form available on the ACPR website ("Soumettre un signalement à l'ACPR")
- Phone: +33 1 42 44 66 88

AMF:

- Post: Autorité des Marchés Financiers, 17 place de la Bourse, 75082 Paris Cedex 02, FRANCE
- Online: form available on the AMF website ("Lanceur d'alerte")
- Phone: +33 1 53 45 64 44
- Videoconference: upon request, a videoconference can be organised with specialist AMF staff (typically within 20 working days of your request)

- In person: by meeting in person with specialist AMF members in AMF office

If you have difficulty identifying the appropriate authority, the Defender of Rights (le Défenseur des droits) can guide you to the competent authority to handle your report. The Defender of Rights is an independent French administrative authority responsible for upholding rights and freedoms.

The Defender of Rights may be contacted:

- Post: (free of charges, no stamp required), using the double-envelope system: place your report in a sealed envelope marked only "Whistleblowing report" (Signalement d'une alerte), then place this envelope inside a second envelope addressed to: Défenseur des droits, Libre réponse 71120, 75342 Paris Cedex 07
- Online: form available online form
- Phone: +33(0)9 69 39 00 00

Section 3.1 – qualifying reports

Eligible person (whistleblower status)

In addition to the Policy and in accordance with applicable French law, to qualify as an eligible person:

- you must not derive any direct financial benefit from your report
- you must act in good faith, meaning that you have reasonable grounds to believe that the facts you are reporting are accurate based on the information available to you and that they may reasonably fall within the scope of a whistleblowing report.

Under French law, whistleblower status and the associated protections will not apply if you knowingly report false information or act with the intent to cause harm.

Eligible subject matter

In addition to the examples of misconduct outlined in the Policy, the following constitutes additional reportable events (eligible subject matter) in France:

- Situations that could potentially amount to a breach or an attempt to cover up a breach:
    - of a French legislation or a regulation (for example, obligations defined by the French Monetary and Financial Code, by the AMF General Regulation)
    - of European Union laws
    - of professional and ethical standards
    - of specific instructions/directions from the supervisory bodies (e.g., ACPR, AMF).

Section 3.2 – assessment, investigation and outcomes

Response timeframe: ANZ will acknowledge receipt of your report within seven days and will provide an initial response within three months, informing you of the actions planned or already taken to assess the accuracy of your report and, where appropriate, to address the matters raised.

Section 3.3.2 – identity protection

Strict confidentiality applies to every aspect of any whistleblowing report made in accordance with this Policy. In particular, confidentiality covers:

- the identity of the whistleblower
- the identity of the individual(s) concerned by the report
- all information collected by any person involved in the handling and investigation of the report, at all stages.

This confidentiality principle ensures that the identity of the whistleblower and any persons referred to in the report is protected and not accessible to unauthorised staff members (that is, anyone other than authorised staff members responsible for receiving or following up on reports).

In addition, the identity of the whistleblower may only be disclosed with their consent, except where disclosure is required by judicial authorities.

France Policy Administration

Personal Data

For further information in relation to how your personal data will be handled, please contact ANZ's Data Protection Representative:

- Post: ANZ, Level 12, 25 North Colonnade, Canary Wharf, London E14 5HZ
- Email: gdpreurope@anz.com
- Phone: +44 (0) 203 229 2121.

4. Germany

Further requirements

In addition to the Policy, please note the following if you are reporting from Germany or your concern or report relates to the ANZ Group's business or branch in Germany (ANZ Germany), you may be eligible for statutory protections under German law, including the German Whistleblower Protection Act 2023.

This Germany Schedule sets out certain aspects of the protections that may be available under German law, where these differ to the protections outlined in this Policy. If you require further information on the application of the law, please seek independent legal advice.

Section 3.1.2 – reporting to regulators

You are entitled to escalate your report to the German banking regulator, Federal Financial Supervisory Authority (BaFin) directly at any time:

- Post: Bundesanstalt für Finanzdienstleistungsaufsicht, Hinweisgeberstelle, Graurheindorfer Straße 108, 53117 Bonn
- Online: https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=2BaF6&language=eng
- Email: buergeranfragen@bafin.de
- Phone: +49 228 4108 0

Section 3.1 – qualifying reports

This Policy contains examples of what might constitute reportable misconduct. This list is not intended to be exhaustive and there may be other examples. Specific legal protections apply in Germany, under the German Whistleblower Protection Act, in relation to reports of potential violations outlined in the Act.

In addition to the categories of eligible reporters covered by section 3.1, you can also make a report under this Policy if you are:

- Applying for a job at ANZ and have obtained information about a potential violation detailed in the German Whistleblower Protection Act
- Your employment relationship with ANZ has not commenced and you have obtained information about a potential violation detailed in the German Whistleblower Protection Act during the recruitment process.

Section 3.2.1 –assessment

The Whistleblower Program Team will document all incoming reports in a permanently retrievable manner in compliance with the principle of confidentiality.

Where you make a report by telephone or any other type of voice transmission, a written summary of the report will be prepared. Any permanently retrievable audio recording or written transcription of the conversation may only be made with your consent.

You shall be given the opportunity to review the written record, make corrections if necessary and confirm them by signature or in electronic form. Retention of data, including whistleblower data, is managed in line with applicable ANZ Policies, regulations and laws.

At your request, a personal meeting will be arranged with a person responsible for receiving a report (or delegate) within a reasonable time. The meeting may take place by video conference if you consent.

In addition to the process set out in the Policy after you have made a report

- if you are reporting from Germany, you will receive an acknowledgement of receipt of the report within seven days
- In principle and where possible, you will receive a response from the whistleblower program within three months of the acknowledgement of receipt, unless it may impact internal inquiries or investigation or may prejudice the rights of the persons who are the subject of a report or who are named in the report. Further, if ANZ needs to disclose your identity for legal reasons (for example, in response to a court order), ANZ must inform you in advance of the disclosure and its reasons, unless ANZ was informed by the relevant competent authority that the information would jeopardise the investigation, inquiries or court proceeding.

Section 3.3 – Protections

In addition to the obligations set out in section 3.3, obstructing or attempting to obstruct a whistleblower report or communication between you and the Whistleblower Program Team or any other authorised or eligible recipient of whistleblower reports following a report is expressly prohibited.

Section 4 – Roles and Responsibilities

Whistleblower Protection Officer (WPO)

In addition to the roles and responsibilities set out in the internal Policy and subject to any conflicts, the WPO must notify the:

- Head of Compliance (or delegate) for ANZ Frankfurt as soon as reasonably practicable of any report containing allegations relating to insider trading and market abuse
- Money Laundering Reporting Officer (or delegate) for ANZ Frankfurt as soon as reasonably practicable of any report containing allegations relating to money laundering or terrorism financing.

The Head of Compliance (or delegate) or Money Laundering Reporting Officer (or delegate) for ANZ Frankfurt will work with the WPO to determine if the matter needs to be reported to the relevant regulator/s or any other relevant internal/external stakeholder as required.

Germany Policy administration

Personal Data

For further information in relation to how your personal data will be handled, please contact ANZ's Data Protection Representative:

- Post: ANZ, Level 12, 25 North Colonnade, Canary Wharf, , London E14 5HZ
- Email: gdpreurope@anz.com
- Phone: +44 (0) 203 229 2595.

5. Hong Kong (HK)

Further requirements

In addition to the Policy, please note the following if you are reporting from Hong Kong or your concern or report relates to the ANZ Group's business in Hong Kong:

Section 4 – Roles and Responsibilities

Whistleblower Protection Officer (WPO)

In addition to the roles and responsibilities set out in this Policy:

- Where a report relates to fraud, deception, theft, forgery, corruption or other illegal activity, the WPO must contact the HK Compliance team (or alternatively the Hong Kong Legal team) immediately (to the extent permitted by law); and the HK Compliance team (or Hong Kong Legal Team) will work with the WPO to determine if the matter needs to be reported to the HK regulator, the Hong Kong Monetary Authority (HKMA)

- Where a report contains allegation in relation to suspected external or internal fraud and/or where an investigation confirms or suspects external or internal fraud, that could lead to material potential financial loss to ANZ, its customers or have significant impact on ANZ's reputation, the WPO must notify the HK Compliance Head (or Hong Kong Legal Head) immediately (to the extent permitted by law), who may in turn be required to notify the HKMA or other relevant regulatory (e.g. Securities and Futures Commission) or law enforcement authorities on the same day
- The outcome of investigations where allegations of a serious nature have been substantiated must be reported to the HK Compliance Head (or Hong Kong Legal Head), who together with the WPO will determine the required reporting relevant to senior management and the head/regional office overseeing the Hong Kong operation.

6. Indonesia

Further requirements

In addition to the Policy, please note the following if you are reporting from Indonesia or your concern or report relates to the ANZ Group's business in Indonesia:

Section 3.1.2 – reporting to regulators

A reminder you are entitled to escalate your report to the Indonesian Financial Services Authority, Otoritas Jasa Keuangan (OJK) directly at any time if your concern relates to:

- disputes between consumers and PT Bank ANZ Indonesia; or
- offences to laws and regulations in the financial services sectors by PT Bank ANZ Indonesia, pursuant to Article 9 of OJK Regulation No. 31/POJK.07/2020 on the Implementation of Consumer and Public Services in the Financial Services Sector by the Financial Services Authority and subsequently amended by OJK Regulation No. 22 Year 2023 on Consumer and Public Protection in The Financial Services Sector.

Contact information

- Post: Radius Prawiro Tower, 2nd Floor, Bank Indonesia Office Complex, Jl.MH. Thamrin No.2, Central Jakarta 10350
- Email: konsumen@ojk.go.id
- Phone: +6221 157

Section 3.1 – How to raise concerns

Please be aware that reports made from Indonesia or where the concern or report relates to the ANZ's Group's business in Indonesia, specifically if related to any fraud (including any fraud as described under OJK Regulation No. 12 of 2024 concerning Implementation of Anti-Fraud Strategy For Financial Service Institutions) can also be reported under applicable local policy as well as this Policy.

Section 4 – Roles and Responsibilities

Whistleblower Protection Officer (WPO)

Where a report contains allegations relating to fraud, bribery or corruption, the President Director of PT Bank ANZ Indonesia will appoint a WPO who is responsible for handling such matters within PT Bank ANZ Indonesia (i.e., Compliance Director or Chief Risk Officer Indonesia).

The assigned WPO will work with the Whistleblower Program Team to determine if the matter needs to be reported to the Indonesian Financial Services Authority, Otoritas Jasa Keuangan (OJK) as governed under PT Bank ANZ Indonesia's Anti-Fraud Policy & Procedure.

7. Japan

Further requirements

In addition to the Policy, please note the following if you are reporting from Japan or your concern or report relates to the ANZ Group's business or branch in Japan (ANZ Japan), you may be eligible for statutory protections under Japanese law, including the Japan Whistleblower Protection Act 2026.

This Japan Schedule sets out certain aspects of the protections that may be available under Japanese law, where these differ to the protections outlined in this Policy. If you require further information on the application of the law, please seek independent legal advice.

Section 3.3 – Protections

In addition to the obligations set out in section 3.3, obstructing or attempting to obstruct a whistleblower report by, without justifiable reason, requesting an agreement not to make a whistleblower report or by notifying a reporter that disadvantageous treatment will be imposed if such whistleblower report is made or by any other similar act, is expressly prohibited.

In addition to the process set out in this Policy after you have made a report, an officer or employee of ANZ Group must not, without justifiable reason, request a whistleblower to disclose that they are a whistleblower or engage in any other act aimed at identifying the whistleblower.

8. New Zealand

Further requirements

In addition to this Policy, please note the following if you are reporting from New Zealand or your concern or report relates to the ANZ Group's business in New Zealand i.e., ANZ Bank New Zealand Limited (ANZNZ); ANZ New Zealand Investments Limited; or ANZ Investments Services (New Zealand) Limited (together, the ANZNZ Group):

- If you are reporting a concern from New Zealand or your concern or report relates to the ANZNZ Group, you may be eligible for statutory protections under New Zealand law, including the Protected Disclosures (Protection of Whistleblowers) Act 2022 (Protected Disclosures Act).
- This New Zealand Schedule sets out a summary of certain aspects of the protections that may be available under New Zealand law, where these differ to the protections outlined in this Policy. If you require further information on the application of the law, please seek independent legal advice.

Section 3.1.2 – reporting to regulators

In addition to raising your concerns in accordance with this Policy and schedule, you are entitled to report your concerns to an appropriate authority at any time, including any of the below authorities:

Reserve Bank of New Zealand

- Post: PO Box 2498, Wellington 6140, New Zealand
- Email: whistleblowing@rbnz.govt.nz
- Phone: +64 4 471 3657

Financial Markets Authority

- Post: PO Box 1179, Wellington 6140, New Zealand
- Email: questions@fma.govt.nz
- Phone: 0800 434 567, +64 4 472 9830

Commerce Commission

- Post: PO Box 2351, Wellington 6140, New Zealand
- Email: https://report.whistleb.com/en/comcom
- Phone: 0800 943 600

Banking Ombudsman Scheme

- Post: Freepost 218002 or PO Box 25327, Wellington 6146, New Zealand
- Email: sing.out@bankwb.org.nz
- Phone: 0800 805 951.

There are also options to report, refer or escalate your concerns to other appropriate authorities or contacts in some situations.

Where you report a concern to an appropriate authority, that authority will only be required to handle that concern in accordance with the Protected Disclosures Act where the relevant statutory requirements are satisfied. An appropriate authority may also refer your disclosure to another appropriate authority or to ANZ, following consultation with you.

Section 3.1 – qualifying reports

This Policy contains examples of what might constitute reportable misconduct. This list is not intended to be exhaustive and there may be other examples. Specific legal protections apply in New Zealand, under the Protected Disclosures Act, in relation to reports of "serious wrongdoing" which includes any acts, omissions or courses of conduct in or by the ANZNZ Group that are or could be one or more of the following:

- an offence
- a serious risk to public health, public safety, the health or safety of any individual or the environment
- a serious risk to the maintenance of New Zealand law, including the prevention, investigation and detection of offences and the right to a fair trial
- unlawful, corrupt or irregular use of public funds or resources
- oppressive, unlawfully discriminatory, grossly negligent or that constitutes gross mismanagement and is done by a person performing (or purporting to perform) a function or duty or exercising (or purporting to exercise) a power on behalf of a public sector organisation or the Government.

The specific legal protections that apply to reports of "serious wrongdoing" only apply to persons who fall within the definition of "discloser" and who make a "protected disclosure" in accordance with the Protected Disclosures Act.

Excluded matters

Exclusion 1: Customer complaints

If you are a customer and are concerned with the way that ANZNZ or any company within the ANZNZ Group has handled any matter, product or service, including an existing complaint, please contact ANZNZ: https://help.anz.co.nz/app/answers/detail/a_id/117/~/lodge-a-complaint

Exclusion 2: Personal Work-related Grievances

As described in this Policy, personal work-related grievances are generally excluded. However, if the matter gives rise to any such grievance and also amounts to "serious wrongdoing" under the Protected Disclosures Act and is made in accordance with the required process, the legal protections may apply.

If you are considering making a report you may wish to seek independent legal advice, in relation to the options available for raising concerns of this nature. For further information relating to raising personal work-related grievances through other reporting channels at ANZ, please contact ANZ's Employee Relations team via ANZ PeopleHub.

Exclusion 3: Legal Professional Privilege

Nothing in this Policy authorises a person to disclose information that is protected by legal professional privilege. A disclosure of such information is not protected under the Policy and is not a "protected disclosure" under the Protected Disclosures Act.

Section 3.3 – Protections

Protection from detrimental conduct

In addition to the examples of detrimental conduct set out in this Policy, victimisation is strictly prohibited.

Victimisation means any situation where you receive actual or threatened unfavourable treatment because of making or intending to make, encouraging or giving, information in support of a report under this Policy.

Should you be treated less favourably or experience retaliation or victimisation, upon making a report of "serious wrongdoing" under this Policy, you may be entitled to various protections under New Zealand law (including but not limited to the Protected Disclosures Act, Employment Relations Act 2000, Human Rights Act 1993 and/or Privacy Act 2020).

Confidentiality – identity protection

This Policy lists particular circumstances in which ANZ may need to disclose your Identity (even where you have sought anonymity).

In addition to these circumstances, where a report of "serious wrongdoing" is made in accordance with the Protected Disclosures Act, ANZ may disclose your Identity if it has reasonable grounds to believe that disclosing the identifying information is essential:

- for the effective investigation of a disclosure
- to prevent a serious risk to public health, public safety, the health or safety of any individual or the environment
- to comply with the principles of natural justice.

In addition to the protections outlined in this Policy, if you are an employee of the ANZ business to which a report relates or another "discloser" for the purposes of the Protected Disclosures Act and you provide supporting information in relation to that report so that the report can be investigated, both the information and your identity will be protected under this Policy, where you disclose that information in accordance with ANZ policy and New Zealand law.

If you are dissatisfied with the way ANZ investigated or acted upon the report, you are entitled to raise this with an appropriate authority, including one of the authorities noted above in this schedule.

Section 4 – Roles and Responsibilities

Whistleblower Program Team

The manner in which ANZ NZ whistleblower disclosures are reported for ANZ NZ is:

- deidentified reports for high or extreme (or other material) risks (by reference to ANZ's non-financial risk framework) and table of outcomes for substantiated/partially substantiated matters for the period, to the nominated NZ Board committee or as requested by the NZ Board
- general reporting, including deidentified table of outcomes for substantiated/partially substantiated matters, to the nominated NZ Executive Management committee as required.

NZ Policy administration

The Board of ANZNZ is committed to noting the body of the Policy and approving material changes to this New Zealand Schedule to the Policy.

9. Papua New Guinea (PNG)

Further requirements

In addition to this Policy, please note the following if you are reporting from PNG or your concern or report relates to Australia and New Zealand Banking Group (PNG) Limited (ANZPNG):

Section 3.1.2 – reporting to regulators

A reminder you are entitled to escalate your report to the financial regulator directly at any time regarding your concern: Bank of Papua New Guinea (BPNG):

- Post: PO Box 121, Port Moresby 111, National Capital District, Papua New Guinea
- Online: (contact form) https://www.bankpng.gov.pg/about-us/contact-us/
- Phone: +675 322 7200
- Fax: +675 321 1617

Section 3.1 – qualifying reports

Eligible persons

While we encourage any of persons listed in section 3.1 of this Policy to speak up if they have concerns relating to ANZPNG, it is important to note that only employees of ANZPNG are eligible to make reports which qualify for protection under PNG's Whistleblower Act 2020 (the PNG Act).

Eligible subject matter

The PNG Act applies to disclosures of 'impropriety' in the workplace by employees. In addition to the examples listed in section 3.1 of this Policy, the following would amount to impropriety under the PNG Act:

- a miscarriage of justice
- endangering the health or safety of an individual
- environmental damage
- unfair discrimination
- deliberately concealing any of the above conduct.

Further, for a disclosure to qualify as a 'protected disclosure' under the PNG Act, it must be made in good faith.

It is an offence to make an intentionally false or misleading disclosure and may be subject to a fine of up to K10,000.00 or six months' imprisonment with hard labour. A disclosure will also not be protected if you commit an offence by making it.

Eligible recipients

In addition to the subject matter and good faith requirements noted above, in order for a report to qualify as a protected disclosure under the PNG Act, it must be made to:

- a lawyer who holds a current practising certificate issued under the PNG Lawyers' Act 1986
- any of the persons or channels set out in section 3.1 of this Policy.

Section 3.3 – Protections

Protection from detrimental conduct

In addition to the protections set out in section [3.4.3] of this Policy, under the PNG Act an employer must not subject an employee to 'occupational detriment' as a result or partly as a result, of the employee making a protected disclosure.

Occupational detriment means being:

- subjected to any disciplinary action
- dismissed, suspended, demoted, harassed or intimidated
- transferred to a different position against your will
- refused transfer or promotion
- subjected to a term or condition of employment or retirement which is altered to your disadvantage
- refused a reference or being provided with an adverse reference
- denied appointment to any employment or office
- threatened with any of the above
- adversely affected in respect of your employment, profession or office in any other way.

Under the PNG Act, if you have made a protected disclosure and you reasonably believe that, as a result of making that disclosure, you have or will be subject to occupational detriment, you may request a transfer to another position within ANZPNG in which you will not be subject to occupational detriment. ANZPNG must comply with that request if it is reasonably practicable to do so.

If you have been subjected to occupational detriment as a result of making a protected disclosure, you may apply to a competent PNG court for appropriate relief.

Section 4 – Roles and Responsibilities

Whistleblower Protection Officer (WPO)

In addition to the roles and responsibilities set out in this Policy, the WPO must inform the Chair, the Chair of the Audit Committee or Audit and Risk Committee. The Chair (or such other appropriate person) must report to the BPNG any matter where:

- there are serious prudential concerns
- where the illegal, unethical or questionable practices related to the Chair or senior staff.

PNG Policy administration

The Board of ANZPNG is committed to noting the body of the Policy and approving this PNG Schedule to the Policy.

10. Singapore

Further requirements

In addition to the Policy, please note the following if you are reporting from Singapore or your concern or report relates to the ANZ Group's business in Singapore:

You should know that in addition to the confidentiality and consent processes set out in this Policy, ANZ is required to comply with certain obligations, including but not limited to, Section 47 of the Banking Act 1970 – Privacy of Customer Information and the Personal Data Protection Act 2012. The WPO assigned to your matter will handle the information as set out below.

Section 4 – Roles and Responsibilities

Whistleblower Protection Officer (WPO)

In addition to the roles and responsibilities of the WPO set out in this Policy, where ANZ would need to disclose any customer data or employee data to third parties for the purposes of managing or investigating a report (for example, ANZ being required to disclose such information for the purposes of obtaining legal advice or otherwise required by a regulator), the WPO will consult with ANZ Singapore Compliance and Legal teams with respect to such proposed disclosure to ensure that any obligations imposed on ANZ Singapore under applicable legislation by the Monetary Authority Singapore (MAS) and/or any other regulator are met.

11. South Korea

Further requirements

In addition to this Policy, please note the following if you are reporting from South Korea or your concern or report relates to the ANZ Group's business in South Korea:

Section 4 – Roles and Responsibilities

Whistleblower Protection Officer (WPO)

In addition to the roles and responsibilities of the WPO set out in this Policy, where the WPO considers a report may constitute an illegal or wrongful act that may have a material impact on ANZ Seoul, the WPO will consult with the ANZ Seoul Compliance team (or alternatively ANZ Seoul Talent & Culture team) as soon as possible, so an assessment can be made to determine whether the matter must be reported to the Financial Supervisory Service (FSS). Where appropriate, a representative of the ANZ Seoul Compliance team (or alternatively ANZ Seoul Talent & Culture) will assist the WPO in oversight and management of a matter relating to ANZ Seoul.

An illegal or wrongful act:

An illegal or wrongful act that may have a material impact on ANZ Seoul and is required to be reported to the Financial Supervisory Service (FSS) includes:

- a financial incident resulting in a financial loss of 300 million KRW or more

- any matter that is assessed as a High or Extreme risk to ANZ as defined under the non-financial risk impact scale
- any matter relating to internal or external fraud
- any incident that results in a decline of public confidence of ANZ
- any incident that impacts the stability of or confidence in the financial services industry .

Failure to report an illegal and or wrongful act that may have a significant impact on ANZ may result in disciplinary action for ANZ Seoul employees or officers.

12. Taiwan

Further requirements

In addition to this Policy, please note the following if you are reporting from Taiwan or your concern or report relates to the ANZ Group's business in Taiwan:

Section 4 – Roles and Responsibilities

Whistleblower Protection Officer (WPO)

In addition to the roles and responsibilities set out in this Policy, where the WPO considers a report may potentially constitute a material reportable event or illegal activity, the WPO must contact Taiwan Compliance team (or alternatively Taiwan Talent & Culture) and the Taiwan Compliance team (or alternatively Taiwan Talent & Culture) will work with the WPO to determine if the matter needs to be reported to the Financial Supervisory Commission, Central Bank of the R.O.C., Central Deposit Insurance Corporation and/ or other concerned authority.

For a material reportable event, the amount of financial loss is not the absolute determinant of Material Reportable Events. Any incident that endangers the normal operation of a financial institution and impact the order of financial industry is considered a material reportable event. For examples of what constitutes a material reportable event please seek further guidance from the Taiwan Compliance Team.

13. Thailand

Further requirements

In addition to this Policy, please note the following if you are reporting from Thailand or your concern or report relates to the ANZ Group's business in Thailand:

Section 4 – Roles and Responsibilities

Whistleblower Protection Officer (WPO)

In addition to the roles and responsibilities set out in this Policy, the WPO must also inform the Head of Compliance (or delegate) of ANZ Bank (Thai) Public Company Limited (ANZ Thailand) or alternatively the Head of Legal Asia, where a report relates to:

- the Thai Overnight Repurchase Rate (THOR) reference rate submission. Subject to any conflicts, the WPO must notify the Head of Compliance (or delegate) of ANZ Thailand or alternatively the Head of Legal Asia, as soon as reasonably practicable of any report containing allegations relating to a potential violation of the Bank of Thailand 'Operating Standards for Commercial Banks and Specialised Financial Institutions in Submitting the Transaction Information for Preparing the Thai Overnight Repurchase Rate (THOR)' or potential manipulation of the THOR. The Head of Compliance (or delegate) of ANZ Thailand or alternatively, the Head of Legal Asia, will work with the WPO to determine if the matter needs to be reported to the Bank of Thailand (BOT). Where an allegation relating to a potential violation of the Bank of Thailand 'Operating Standards for Commercial Banks and Specialised Financial Institutions in Submitting the Transaction Information for Preparing the Thai Overnight Repurchase Rate (THOR)' or potential manipulation of the THOR is substantiated, the Bank of Thailand must be notified within 15 business days from the date of investigation completion.

- Thai Baht Interest Rate Fixing (THBFIX) – subject to any conflicts, the WPO must notify the Head of Compliance (or delegate) of ANZ Thailand or alternatively Head of Legal Asia as soon as reasonably practicable of any report containing allegations relating to a potential violation of the Bank of Thailand 'Operating Standards for Commercial Banks and FX Brokers in Submitting Data for Compiling Thai Baht Interest Rate Fixing (THBFIX)' or potential manipulation of the THBFIX contribution. The Head of Compliance (or delegate) of ANZ Thailand or alternatively the Head of Legal Asia, will work with the WPO to determine if the matter needs to be reported to the Bank of Thailand (BOT). Where an allegation relating to a potential violation of the Bank of Thailand 'Operating Standards for Commercial Banks and FX Brokers in Submitting Data for Compiling Thai Baht Interest Rate Fixing (THBFIX)' or potential manipulation of the THBFIX contribution is substantiated, the Bank of Thailand must be notified within 15 business days from the date of investigation completion.
- Financial Crime – subject to any conflicts, the WPO must notify the Head of Compliance (or delegate) or Head of Financial Crime for ANZ Thailand as soon as reasonably practicable of any report containing allegations relating to fraud, money laundering or terrorism financing. The Head of Compliance (or delegate) or Head of Financial Crime of ANZ Thailand will work with the WPO to determine if the matter needs to be reported to the Bank of Thailand (BOT) or any other relevant internal/external stakeholder.
- Where ANZ is required to disclose any Thailand customer data or Thailand employee data to a third party (i.e. obtaining legal advice from an external law firm or otherwise required by a regulator for the purposes of managing or investigating a report), subject to any conflicts, the WPO must consult with the Head of Compliance (or delegate) of ANZ Thailand or alternatively the Head of Legal Asia, prior to disclosing any information/data to ensure compliance with applicable legal and regulatory requirements under the Bank of Thailand (BOT), Personal Data Protection Commission (PDPC) and/or any other relevant regulators.

Whistleblower Program Team

The manner of reporting for ANZ Bank (Thai) Public Company Limited to the Audit Committee or Board of Directors, at least annually and as agreed with the respective Board.

14. United Arab Emirates

Further requirements

In addition to the Policy, please note the following if you are reporting from Dubai international Financial Centre (DIFC) or your concern or report relates to the ANZ Group's business in Dubai International Financial Centre (DIFC):

Section 3.1.2 – reporting to regulators

A whistleblower may prefer to report the concerns directly to the DFSA or to another relevant authority.

Section 4 – Roles and Responsibilities

Whistleblower Program Team, Whistleblower Investigation Team

ANZ must maintain a written record of each regulatory concern reported to it by a whistleblower, including appropriate details of the regulatory concern and the outcome of its assessment of the reported concern. The records under Rule should include:

- the date the report was received
- a summary of the concerns raised
- steps taken by the authorised person in relation to the report until the matter is resolved
- any steps taken to maintain the confidentiality of the whistleblower and to ensure fair treatment of the whistleblower
- the list of persons who have knowledge of the report
- the outcome of the assessment of the report including the rationale for the outcome and any decision on whether or not to disclose the report to the DFSA or any other relevant authority

- references or links to all documentation and review papers in relation to the report.

15. United Kingdom

Further requirements

In addition to this Policy, please note the following if you are reporting from the United Kingdom (UK) or your concern or report relates to the ANZ Group's business in the UK (ANZ UK).

Section 3.1.2 – reporting to regulators

You are entitled to escalate your report to the following regulators directly at any time provided the concern or report constitutes a 'Reportable Concern' (as defined below). Note you may report either to the FCA or PRA without first reporting internally or through utilising ANZ's internal whistleblowing arrangements. You may also report to both regulators simultaneously and consecutively.

Financial Conduct Authority (FCA)

- Post: Intelligence Department (Ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN
- Online: FCA Online Report Form for whistleblowers
- Email: whistle@fca.org.uk
- Phone: +44 (0)20 7066 9200

Prudential Regulation Authority (PRA)

- Post: IAWB (Legal Directorate), Bank of England, Threadneedle Street, London, EC2R 8A
- Email: whistleblowing@bankofengland.co.uk
- Phone: +44 (0)203 461 8703

Section 3.1 – qualifying reports

Eligible Subject Matter

A Reportable Concern is:

- anything that would be a "UK Protected Disclosure", which is a disclosure made on reasonable grounds and on the basis that the person making the disclosure believes it to be substantially true, it is in the public interest and contains information that one or more of the following has been, is being or is likely to be, committed:

(8) a criminal offence
(9) a failure to comply with any legal obligation
(10) a miscarriage of justice
(11) the putting of the health and safety of an individual in danger
(12) sexual harassment
(13) damage to the environment
(14) deliberate concealment relating to any of the above

- anything that is a breach of ANZ's policies and procedures
- behaviour that harms or is likely to harm the reputation or financial well-being of ANZ.

A reportable concern can relate to a matter that occurred, occurs or would occur in the UK or another jurisdiction.

Section 4 – Roles and Responsibilities

Whistleblower Protection Officer (WPO)

In addition to the responsibilities set out for the WPO in this Policy, the WPO has additional responsibilities with disclosures arising from or in relation to the ANZ Group's business in the UK:

- Report at least annually to the ANZ Europe Executive Committee where a Report has been made by an UK-based employee or contingent Worker

- Ensure ANZ London Branch reports to the FCA about each case brought by a UK-based employee that was contested but lost before an employment tribunal where the claimant successfully based all or part of their claim on detriment suffered as a result of making a Protected Disclosure (UK)
- Where a report relates to an employee of ANZ UK, advise the Head of Compliance and Operational Risk UK and Europe (or delegate) as soon as a report is made, so an assessment can be conducted to determine whether the matter must be escalated to the FCA and/or PRA. In the event of a conflict, the Chief Risk Officer, UK & Europe or the Chief Risk Officer, International should be notified.

In addition to the Roles and Responsibilities in this Policy, there is also the following roles applicable in the ANZ London branch.

Whistleblower Champion (UK)

The Whistleblower Champion for the ANZ London branch has the following roles and responsibilities:

- Ensuring and overseeing the integrity, independence and effectiveness of the whistleblowing policy applicable to the ANZ London Branch
- Where appropriate, ensuring that the Whistleblower Program Lead reports at least annually to the governing body of ANZ London Branch (ANZ Europe Executive Committee) where a report has been made by a UK based employee or contingent worker, if appropriate
- Ensuring that ANZ London Branch reports to the FCA about each case brought by a UK based Employee that was contested but lost before an employment tribunal where the claimant successfully based all or part of their claim on detriment suffered as a result of making a UK Protected Disclosure.

While the Whistleblower Champion does not need to have to have a day-to-day operational role in handling disclosures from whistleblowers or commencing investigations, he or she must have a level of independence and access to independent legal advice and sufficient information to carry out their responsibilities.

UK line managers (UK-based managers & managers of UK-based employees)

All UK-based line managers and line managers of UK-based employees must undergo appropriate training specifically on:

- how to recognise when there has been a disclosure of a reportable concern by a whistleblower;
- how to protect whistleblowers and ensure their confidentiality is preserved;
- how to provide feedback to a whistleblower, where appropriate;
- steps to ensure fair treatment of any person accused of wrongdoing by a whistleblower; and
- sources of internal and external advice and support on the matters referred to above.

UK Policy administration

Personal Data

For further information in relation to how your personal data will be handled, please contact ANZ's Data Protection Representative:

- Post: ANZ, Level 12, 25 North Colonnade, Canary Wharf, London E14 5HZ
- Email: gdpreurope@anz.com
- Phone: +44 (0) 203 229 2595

Internal Approval Body: The Whistleblower Champion for ANZ's London Branch (for oversight of preparation of the UK Annual Whistleblowing Report).

External Approval Body: ANZ's London Branch is required to prepare a Whistleblowing activity report (UK Annual Whistleblowing Report) to the ANZ Europe Executive Committee which must also be made available to the FCA or PRA on request, but not made public.

16. United States (U.S.)

Further requirements

In addition to this Policy, please note the following if you are reporting from the U.S. or your concern or report relates to the ANZ Group's business or branch personnel in the U.S.

Employees located in ANZ's New York office have whistleblower and anti-retaliation protections under a number of U.S. federal, state and local laws (U.S. Whistleblower Laws), including laws that relate specifically to securities and financial services organizations.

New York State Specific Requirements

Under New York State Labor Law Section §740 ANZ New York Branch staff as private sector employees, are afforded a "reasonable belief" standard under the law and when filing a whistleblower complaint, need only demonstrate that they reasonably believed that their employer's practices violated any federal, state or local statute, rule or regulation regardless of the subject matter.

ANZ New York Branch staff (e.g., employees) must still make a good faith effort to notify ANZ about the violation "prior to" making an external notification. However, such notification is not required by staff where:

- there is an imminent and serious danger to the public health or safety;
- where the employee reasonably believes that reporting would result in a destruction of evidence or other concealment of the activity, policy or practice;
- such activity, policy or practice could reasonably be expected to lead to endangering the welfare of a minor;
- the employee reasonably believes that reporting to the supervisor would result in physical harm to the employee or any other person; or
- the employee reasonably believes that T&C, a supervisor, legal or Compliance is already aware of the activity, policy or practice and will not correct such activity, policy or practice.

The definition of "employee(s)" under also includes current and former employees and independent contractors.

The definition of "law, rule or regulation" is defined as: (i) any duly enacted federal, state or local executive order; (ii) any rule or regulation promulgated pursuant to any such executive order; or (iii) any judicial or administrative decision, ruling or order.

The definition a "retaliatory action" includes: An adverse action taken by ANZ as an employer to discharge, threaten, penalize or in any other manner discriminate against any employee or former employee exercising his or her rights under [§ 740], including:

- adverse employment actions or threats to take such adverse employment actions against an employee in the terms of conditions of employment, including, but not limited to, discharge, suspension or demotion;
- actions or threats to take such actions that would adversely impact a former employee's current or future employment; or
- threatening to contact or contacting United States immigration authorities or otherwise reporting or threatening to report an employee's suspected citizenship or immigration status or the suspected citizenship or immigration status of an employee's family or household member, as defined in subdivision two of section four hundred fifty- nine-a of the social services law, to a federal, state or local agency.

Threats to take actions that would adversely impact the employee's current or future employment are considered retaliatory, along with an employee's demotion or termination or suspensions and are prohibited by any ANZ employee, director or officer.

The statute of limitations for claims brought under § 740 is two (2) years and employees are expressly entitled to additional remedies such as trial by jury, recovery of front pay, civil penalties not to exceed $10,000 and punitive damages. Prevailing plaintiffs are also entitled to injunctive relief, reinstatement, compensation for lost wages, benefits and other remuneration and reasonable costs and attorney's fees. Notably however, employees should note that if a court finds that a retaliation claim was brought "without basis in law or in fact", a court may award reasonable attorney's fees and court costs and disbursements to ANZ as the employer.

ANZ NY Branch employees may find all protections, rights and obligations afforded to them under § 741 and posted in designated posting area by T&C or refer to the below link.

https://dol.ny.gov/system/files/documents/2022/02/ls740_1.pdf

Section 3.1.2 – reporting to regulators

A reminder that if you are reporting from the U.S. or your concern or report relates to the ANZ Group's business or branch in the U.S., you are entitled to escalate your report to the following regulators directly at any time (this includes cooperating with, responding to any inquiry from or providing testimony to any regulatory or investigatory agency or authority) and you are entitled to remain anonymous in doing so. The Whistleblower laws enforced by the various agencies prohibit ANZ as an employer from retaliating against employees for engaging in activities protected under those laws.

Contact information

Financial Industry Regulatory Authority (FINRA) Office of the Whistleblower

- Website: www.finra.org/whistleblower
- Phone: 1-866-96-FINRA (1-866-963-4672)

  FINRA encourages individuals with information about potentially fraudulent, illegal or unethical activity to submit a regulatory tip.

United States Department of Labor: Occupational Safety and Health Administration (OSHA)

- Online: www.finra.org/whistleblower
- Phone: 1-800-321-OSHA (6742)
- OSHA administers more than twenty whistleblower protection laws, including Section 11(c) of the Occupational Safety and Health (OSH) Act, which prohibits retaliation against employees who complain about unsafe or unhealthful conditions or exercise other rights under the Act. Each law has a filing deadline, varying from 30 days to 180 days, which starts when the retaliatory action occurs.

United States Securities and Exchange Commission (SEC) Office of the Whistleblower

- Online: https://www.sec.gov/whistleblower/submit-a-tip
- Phone: (202) 551-4790
- Through the SEC Whistleblower Program, qualified whistleblowers, individuals who voluntarily provide the SEC original information that leads to a successful enforcement action, are entitled to a monetary award of 10-30% of funds recovered by the government.

New York State Department of Labor

- Website: https://dol.ny.gov/system/files/documents/2021/03/ls223.pdf
- Phone: (888) 581-5812
- Please refer to The New York State Department of Labor (NYSDOL) Notice of Employee Rights, Protections and Obligations under Labor Law Section 740.

U.S. Commodity Futures Trading Commission

- Website: https://www.whistleblower.gov/overview/submitatip/
- Phone: (866) 873-5675

- You can submit a tip to the Division of Enforcement by filing a Form TCR through the CFTC's whistleblower program. Individuals who submit a Form TCR receive privacy, confidentiality and anti-retaliation protections under the Commodity Exchange Act and may be eligible for monetary awards. Whistleblowers can file a Form TCR anonymously but must provide a way for the Division of Enforcement to contact them.

Section 3.1 – qualifying reports

Eligible persons

There may be additional persons who may be a whistleblower under the U.S. Whistleblower Laws. Please contact FINRA for further information.

Excluded Matters

Exclusion 2: Personal Work Related Grievances

There are also a number of U.S. Whistleblower Laws related to your personal-work related grievances that are covered in separate policies. To the extent that there are any inconsistencies between this Policy and the U.S. Whistleblower Laws, the U.S. Whistleblower Laws will apply, as stated in this Policy.

Section 3.3– Protections

Protection from detrimental conduct

The U.S. Whistleblower Laws recognise that retaliation is one of the primary risks associated whistleblowing. In addition to ANZ's prohibition on detrimental conduct which includes retaliation (in any form, including among others, demotion, discharge, suspension or harassment against any staff who makes a report internally or externally), there may be further protections provided to the whistleblower under the U.S. Whistleblower Laws.

Under U.S. law, you have a private right of action if you feel you have suffered retaliation because of any lawful act of making a whistleblower report. You may contact the applicable agency directly under your Legally Protected Communication rights (see below).

Legally Protected Communications

In general, no offer letter, employment, severance, arbitration (in certain cases), confidentiality or other agreement may prevent, restrict, limit, impede or otherwise interfere with your rights to:

- engage in legally protected employee communications, including without limitation protections for non-supervisory employees under Section 7 of the U.S. National Labor Relations Act;
- file a charge or complaint or initiate an investigation with the applicable government agency;
- make other disclosures that are protected under U.S. Whistleblower Laws, including for example, to the extent applicable, reporting possible violations of law in accordance with Section 21F of the U.S. Securities Exchange Act of 1934 and related rules;
- respond to a lawful subpoena;
- comply with any other legal obligation;
- communicate with any government agency or otherwise participate in any investigation or proceeding that may be conducted by any government agency, including providing documents or other information, without notice to or permission by ANZ; or
- receive any award for information provided to any government agency.

Protections under the Sarbanes Oxley Act of 2002 (SOX)

SOX provides certain legal protection to covered whistleblowers. The following applies to companies' subject to SOX and their officers and employees:

- SOX Section 806 contains the first federally-imposed, broad-based whistleblower protection. Any company with securities registered under Section 12 of the Securities Exchange Act is subject to civil penalties if an employee is discharged, demoted, suspended, threatened, harassed or otherwise discriminated against because such employee provided information, caused information to be provided or otherwise assisted with an investigation related to fraudulent acts. SOX Section 1107 provides criminal penalties of up to 10 years' imprisonment plus a fine for any retaliation resulting from the cooperation with a law enforcement officer for providing truthful information relating to the commission or possible commission of any federal offense.
- In addition, vendors, suppliers and agents cannot discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against employees who provide information in investigations – including internal investigations – into certain types of violations of the securities laws and regulations or who file proceedings relating to similar violations. Also, under SOX Section 1107, any person who knowingly, with the intent to retaliate, takes any action harmful to any person, including interference with the lawful employment or livelihood of any person, for providing a law enforcement officer any truthful information relating to the commission or possible commission of any federal offense, may be fined under such title or imprisoned not more than 10 years or both. SOX Whistleblower Protections do not apply to employees who work outside the U.S.

U.S. Policy administration

This Policy has been reviewed and approved by ANZ and this U.S. ANZ Presence Schedule has been reviewed and approved by the US Head of Compliance and ANZSI's Supervisory Management Group and will be periodically reviewed and approved thereafter. ANZ's independent auditors will make a quarterly report to the appropriate ANZSI committee of:

- the number of disclosures made;
- the number of investigations commenced in response to disclosures;
- the number of wrongdoings discovered; and
- all disciplinary actions taken in response to matters discovered through disclosures.

U.S. Annexure Owner	US Head of Compliance
Related policies	ANZ Whistleblower Policy
Schedule Version	3.0
Supporting guidelines to U.S. Annexure	INRA Rule 13201 Section 11(c) of the OSH Act Section 748 and 922 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. SEC Rule 21F-2(b)(1)(iii) Section 740 of the New York Labor Law Sections 806 & 1107 of Sarbanes-Oxley Act - SOX Section 23 Commodity Futures Trading Commission – CFTC Section 7 of the U.S. National Labor Relations Act

17. Vanuatu

Further requirements

In addition to this Policy, please note the following if you are reporting from Vanuatu or your concern or report relates to ANZ Bank (Vanuatu) Limited.

You should know that in addition to the confidentiality and consent processes set out in the Policy, ANZ is required to comply with certain requirements, under the Anti-Money Laundering and Counter-Terrorism Financing Act and Official Secrets Act CAP 111. The WPO assigned to your matter will handle the information as set out below.

Section 4 – Roles and Responsibilities

Whistleblower Protection Officer (WPO)

In addition to the roles and responsibilities set out in the internal Policy:

- The WPO must inform ANZ Vanuatu Compliance (or where appropriate the ANZ Vanuatu Chief Risk Officer) where a report is related to suspicious transactions or activity involving a customer, fraud, bribery and corruption; sanctions violation; and/or
- The WPO will consult with ANZ Vanuatu Compliance (or where appropriate the ANZ Vanuatu Chief Risk Officer) where information contains 'classified material' as defined under the Official Secrets Act CAP 111 to ensure compliance to the Official Secrets Act.

ANZ Vanuatu Compliance are responsible for official reporting to the regulators as required and/or ensure that any obligations under the Official Secrets Act or the Anti-Money Laundering and Counter-Terrorism Financing Act are met.

Term	Definition under the Official Secrets Act CAP 111
Classified material	(a) Any official code, plan, article or document relating to the affairs of the Government (i) which is classified for security purposes by the appropriate department or authority within the Government as top secret, secret, confidential or restricted material; or (ii) the use or possession of which without lawful authority would or might, by virtue of the contents or nature of the material, directly or indirectly prejudice the safety or interests of the Government or the Republic; (b) any official information, of a secret, confidential or restricted nature relating to the affairs of the Government and which if contained in a document would properly be classified as in paragraph (a)(i) of this definition; (c) any confidential material or information lodged or registered in accordance with any law
Code	a code, code word, cipher or any group of letters or figures or both constituting part of a code
Government	the Government of the Republic of Vanuatu