

NZ Insight: New Government, new fiscal strategy

27 March 2024



This is not personal advice nor financial advice about any product or service. It does not take into account your financial situation or goals. Please refer to the Important Notice.



Contact

Miles Workman for more details.

Confused by acronyms or jargon? See a glossary [here](#).

A new strategy

Summary

- The new Government has just released its first Budget Policy Statement (BPS), including its fiscal strategy.
- The BPS noted that the operating allowance for Budget 2024 will be less than the \$3.5bn signalled at the Half-year Update, but they didn't get specific (note, this captures the net impact of the Government's tax and spending cuts, but does not incorporate the fiscal impacts of a weaker economy). Operating allowances for Budget 2025 onwards will be announced alongside May's Budget. Meanwhile, the multi-year capital allowance has been boosted by around \$4bn compared to the Half-Year Update, to \$7bn.
- Overall, while the fiscal policy mix has certainly changed (ie tax and spending cuts), we'd say the signal today is that *discretionary* fiscal policy settings (capex + opex) will be about par or perhaps mildly less expansionary than that baked into the Half-Year Update outlook over the next four years. But this all comes down to how much the operating allowance is reduced from Budget 2024 onwards (we estimate this could be cut by as much as \$5-7bn over 4 years). But the economic drivers of fiscal outcomes are likely to more than offset that.
- The Budget Policy Statement also included an interim update to the Treasury's economic outlook. This points to a much smaller nominal economy over the next four years and a lot less tax revenue as a result (around \$14bn less).
- Our attempts to net out the weak economic signal with today's signal on discretionary policy suggests bond issuance could be upgraded by around \$10-12bn over the next four years come Budget. But we will refine that estimate closer to the time to reflect the latest monthly financial statements and any other pre-Budget announcements.
- Turning to the fiscal strategy, the Government has gone back to the old measure of debt (core Crown net debt), which we think is sensible, as it makes the debt target a little more relevant to discretionary policy choices. The Government intends to get net core Crown debt down to 40% of GDP (at the Half-year Update, it was forecast to reach this level in the year to June 2027). OBEGAL surpluses are certainly a target, but the wording here is a little vague (but will possibly get updated at Budget). Compared to the previous Government's strategy, this looks a touch tighter, but we were expecting something a little tighter still (which still may happen).
- All in all, the info we got today was only partial. The Treasury's tax outlook is much weaker, capex is going to be higher, but in terms of what that all means for bond issuance, we don't know how much changes to future operating allowances will offset this. There is also scope for the Treasury's updated forecast to change a bit from here, and for further policy decisions to move the dial. Bring on Budget 2024.

Highlights of the Budget Policy Statement

Tax and spending cuts will proceed, and based on the signalled operating allowance it looks likely they will be “fiscally neutral”. Whether they are “economically neutral” is a question the RBNZ will need to think about. A fiscally neutral package could still become a small net drag on economic activity if a large enough share of the tax relief is saved or spent on imports, and public sector redundancies from spending cuts outweigh the positive indirect employment impact from slightly higher-than-otherwise household demand. Estimating fiscal multipliers is difficult, but if this is the way it pans out, a “fiscally neutral” package could mean the RBNZ is in a position to ease monetary conditions a little sooner than currently expected (albeit only marginally).

If, in time, the Government decided to respond to weaker revenue by making deeper spending cuts, pressure on CPI inflation from fiscal settings could go into reverse very dramatically. At the other extreme, tax cuts funded by more debt would be inflationary, as the IMF pointed out last week, but the Government has indicated they will not follow this path, and their signalled operating allowance for Budget 2024 is comforting on that front.

Turning to spending allowances, the Government has signalled that the operating allowance for Budget 2024 will be less than the \$3.5b signalled at the Half-Year Update (but that the exact number will be confirmed at the Budget). The operating allowance captures how much discretionary policy wiggle room the Government is giving itself for its policy agenda at the upcoming Budget. This number is net of spending and revenue initiatives (ie it nets out the Government’s plans to cut taxes and spending).

Operating allowances for Budgets 2025 to 2027 will be set out in the Fiscal Strategy Report (alongside Budget). At the Half-Year Update these were \$3.25bn for Budget 2025, and \$3.0bn for Budgets 2026 and 2027. Without knowing the Government’s plans here, we cannot say much about how discretionary fiscal policy choices are likely to impact NZDM’s four-year bond issuance guidance come Budget.

Meanwhile, the multi-year capital allowance is getting a top-up to \$7bn (vs around \$3bn that was available for allocation at the Half-Year Update). This higher capex is for the next four years, but we will have to wait and see whether it is more than, or partially offsets, the lower operating allowance signalled.

Overall, we’d say the signal today is that *discretionary* fiscal policy (opex + capex) could end up around par with what was baked into the Half-Year Update outlook, or possibly a little less expansionary (depending on how much operating allowances are lowered vs the Half-Year Update).

It’s also worth noting that some changes to operational expenses and revenues fall outside the operating allowance, such as those driven by economic impacts: changes to the cost of debt servicing when interest rates surprise, changes to benefit payments when unemployment surprises, or changes to tax revenue when the taxable parts of the economy surprise.

Regarding the Treasury's interim economic outlook, the table below says it all:

Table 1. Treasury's interim forecast update

June years	2023 Actual	2024 Forecast	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast
Real production GDP (annual average % change)						
Budget Policy Statement	3.0	0.1	2.1	3.1	2.8	2.5
Half Year Update 2023	3.2	1.5	1.5	2.8	3.0	2.7
Unemployment rate (June quarter)						
Budget Policy Statement	3.6	4.6	4.9	4.5	4.4	4.4
Half Year Update 2023	3.6	4.5	5.2	4.8	4.6	4.4
CPI inflation (annual % change)						
Budget Policy Statement	6.0	3.3	2.2	2.1	2.0	2.0
Half Year Update 2023	6.0	4.1	2.5	2.2	2.0	2.0
Nominal GDP (\$ billion)						
Budget Policy Statement	395.5	414.6	432.6	455.6	478.4	500.9
change from Half Year Update	-0.5	-5.4	-7.1	-8.0	-10.2	-12.1
Core Crown tax revenue (\$ billion)						
Budget Policy Statement	112.4	120.8	127.1	135.5	143.0	149.8
change from Half Year Update	0.0	-1.2	-2.6	-2.6	-3.2	-4.2

Sources: Stats NZ, the Treasury

Putting it all together, the weaker tax outlook and higher capital spending look like they will add around \$18bn to NZDM's funding requirement over the next four years. However, this will be partially offset by the "less than \$3.5bn" operating allowance in Budget 2024, and possibly a downgrade to the operating allowance from Budget 2025 onwards. It's very loose, but we'd say we're steering down the barrel of a \$10-12bn upgrade to issuance guidance come Budget (at this stage).

That said, there's further information to come before May's Budget: two more sets of monthly fiscal statements (February statements due next Thursday), and possibly further government decisions/announcements.

To get a feel for the risks to fiscal settings over the next few years, let's turn to the fiscal strategy.

Introduction to the fiscal strategy

Fiscal indicators and the Government's fiscal strategy are relatively fluid in New Zealand. The Public Finance Act (PFA) requires both indicators and a strategy, but allows the Government of the day to choose the specific definition of key indicators, such as net debt (eg what assets and liabilities to include/exclude), and what targets it considers appropriate to aim for over time. At the same time, the PFA requires that the Government's objectives are set in accordance with the [principles of responsible fiscal management](#). And of course, the NZ Treasury provides advice on all of this.

The Government uses its fiscal strategy to communicate how it intends to manage the books provided a nasty shock doesn't come along that requires a significant fiscal response (when temporarily deviating from the fiscal strategy would be appropriate). It is also quite wide-ranging, covering debt, the operating balance, expenses, revenues, and net wealth.

There is also a balance to strike between building flexibility into the strategy and making it binding. For example, it might not be optimal for the Government to respond to a slightly weaker economic outlook (that pushes out the timing of a return to surplus by one year) by cutting its spending plans (particularly if the stuff the Government is spending money on is delivering results, which is, and always should be, robustly debated). But at the same time, the strategy needs to be binding enough to ensure that the

Government sticks to it and doesn't keep pushing out the projected day it plans to get the books to where they probably should be (which again, is subject to debate). In practice, forecasting a surplus is pretty straightforward: just tell the Treasury you won't increase spending by as much from next year onwards, no matter how unrealistic that prospect actually is, when you drill down to the details. But achieving surplus is much harder. That requires actually sticking to what you said you'd do (tax and spend) a year ago, and the year before that, and possibly the year before that.

In an ideal world, the self-imposed (PFA-consistent) fiscal rules the Government adopts would also ensure that the resources the Government is using on behalf of the taxpayer are delivering results. But that's not a guarantee. More (or less) government spending doesn't automatically transfer into better (or worse) outcomes, as poor policy-making, planning, measurement, and delivery can get in the way. But one thing's for sure, when the Government sets limits and makes funding "contestable" across different portfolios, it will have to think a lot harder about which policies deserve funding. Economists tend to be relatively agnostic when it comes to the philosophical question about the "optimal size of Government". Rather, size should depend on the net benefits of government activity, while also maintaining a sustainable fiscal stance through economic cycles. A good fiscal strategy certainly helps achieve the latter, but not always the former.

A little fiscal strategy history for context

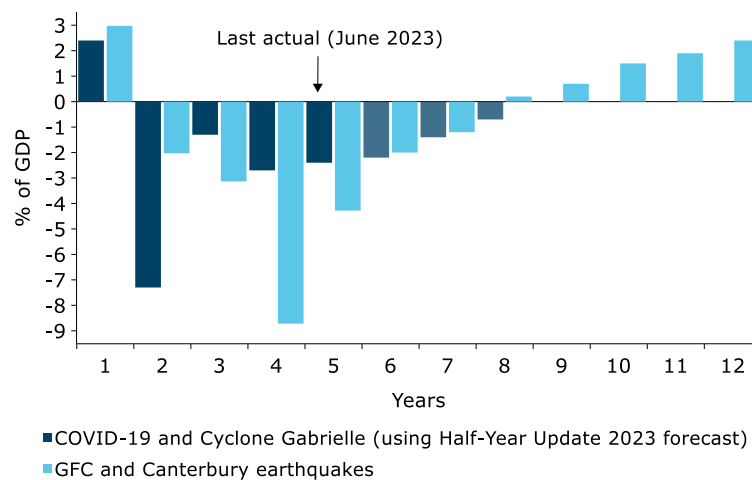
When Labour was elected in 2017, it had campaigned on a relatively prudent fiscal strategy, which involved delivering surpluses, reducing net core Crown debt, and taking a prudent approach to ensure expenditure is phased, controlled, and directed to maximise its benefits. It also noted that the Government would maintain its expenditure to within the recent historical range of spending as a share of GDP. Then COVID-19 happened, and it demanded a big fiscal response, requiring a deviation from the fiscal strategy at the time.

However, that big fiscal response was never really unwound, despite the economy becoming overheated. And when the Government refreshed its fiscal strategy on the other side of the COVID response (in 2022), it was quite a bit looser:

- The debt "target" became a 30% of GDP "ceiling", but under a new debt measure that included NZ Super Fund (NZSF) assets. The inclusion of NZSF assets meant the new 30% was closer to 50% of GDP under the old measure. In reality, treating debt as a ceiling (with a Victorian villa stud height) meant the hurdle was very high for debt to actually become a binding constraint on discretionary fiscal policy. That's not necessarily a bad thing, as debt is a function of both capex and opex: and with plenty of need for infrastructure, the last thing NZ needs is a Government that's not willing to invest. But it does up the ante on the quality of spending.
- The most binding part of the last Government's post-COVID strategy was that OBEGAL 'surpluses will be kept within a band of 0 to 2 percent of GDP to ensure new day-to-day spending is not adding to debt'. This was certainly flexible, but the lack of specifics (eg timeframe) meant it wasn't overly binding in practice.
- Further, there was no mention in the prior Government's strategy about what they'd do with positive revenue surprises. This added to the risks that fiscal policy would be pro-cyclical on the way up, adding stimulus into an already-hot economy, boosting inflation pressures and delivering poor bang-for-buck for taxpayers due to limited resources.

Under the last Government, the forecast return to surplus was repeatedly pushed out as big spending increases became commonplace. The first post-pandemic forecast surplus was in the 2021 Half-Year Update, and it was forecast for the current fiscal year (2023/24). As at the Half-Year Update in December 2023 (where the forecasts maintained the policy settings of the prior Government), the forecast return to surplus was for the 2026/27 fiscal year, and it was wafer thin at just \$0.1bn. we wouldn't be surprised if the weaker economic outlook causes the return to surplus to be pushed out another year at the upcoming Budget. If so, that would mark 8 years of consecutive deficit following the pandemic and cyclone Gabrielle, two years more than following the Global Financial Crisis and Canterbury earthquakes (figure 1).

Figure 1. OBEGAL following crises



Source: New Zealand Treasury, Macrobond, ANZ Research

So is the new fiscal strategy a game changer?

The key parts of the new Government's fiscal strategy are as follows:

- An OBEGAL surplus is certainly the goal, but the wording around this is still a little vague: "An operating surplus will be achieved via a steadily improving OBEGAL trajectory. A specific timeframe for returning to surplus will be set out in the FSR, when a complete set of updated fiscal forecasts and projections will be available. It would be premature to identify a surplus date now, based on incomplete information." Forecasting a surplus is one thing, but we're not sure if this means the Government will announce a *target* surplus date in May or not.
- The Government has gone back to the old measure of net debt. And we think that's a good thing. Yes, it's not quite as comparable to some key international measures, but stripping out NZSF assets will mean less volatility, and ultimately an indicator that better reflects the Government's policy choices. This will make it a lot more binding than previously. In terms of the new debt "ceiling": "the Government intends to put net core Crown debt on a downward trajectory. Once it is below 40 per cent of GDP, the Government intends to maintain net core Crown debt within a band of 20 to 40 per cent of GDP".

The big missing piece for us was any comment about what the Government might do if the economy and revenues surprise on the upside, as that would have added a new symmetry around debt risks, and possibly help avoid pro-cyclical fiscal settings in the future. But overall, today's strategy is a notch higher on the prudent-o-meter, with perhaps a little headroom to go higher still? Time will tell.

Summary

All in all, the writing is on the wall. Pressure on bond issuance is building, but today's information is only partial in terms of what we're likely to see in the May Budget. Indeed, the upcoming Budget Economic and Fiscal Update will be the first update provided by the Treasury that fully incorporates the new Government's policy agenda. How this nets out with their updated economic outlook (which will probably undergo further tweaks versus that presented today) is still an unknown.

Through a macroeconomic lens, the faster the Government consolidates the fiscal position, the sooner the RBNZ will be able to ease monetary conditions (all else equal). And that's an important consideration: there are (always) many households that would benefit from more fiscal support, but there are currently also many struggling in the face of higher interest rates. You'll get better overall outcomes if monetary and fiscal policy work together rather than against each other.



Contact us

Meet the team

We welcome your questions and feedback. Click [here](#) for more information about our team.



Sharon Zollner
Chief Economist

Follow Sharon on Twitter
@sharon_zollner

Telephone: +64 9 357 4094
Email: sharon.zollner@anz.com

General enquiries:
research@anz.com

Follow ANZ Research
@ANZ_Research (global)



David Croy
Senior Strategist

Market developments, interest rates, FX, unconventional monetary policy, liaison with market participants.

Telephone: +64 4 576 1022
Email: david.croy@anz.com



Susan Kilsby
Agricultural Economist

Primary industry developments and outlook, structural change and regulation, liaison with industry.

Telephone: +64 21 633 469
Email: susan.kilsby@anz.com



Miles Workman
Senior Economist

Macroeconomic forecast co-ordinator, fiscal policy, economic risk assessment and credit developments.

Telephone: +64 21 661 792
Email: miles.workman@anz.com



Henry Russell
Economist

Macroeconomic forecasting, economic developments, labour market dynamics, inflation and monetary policy.

Telephone: +64 21 629 553
Email: henry.russell@anz.com



Natalie Denne
PA / Desktop Publisher

Business management, general enquiries, mailing lists, publications, chief economist's diary.

Telephone: +64 21 253 6808
Email: natalie.denne@anz.com



Kyle Uerata
Economic Statistician

Economic statistics, ANZ proprietary data (including ANZ Business Outlook), data capability and infrastructure.

Telephone: +64 21 633 894
Email: kyle.uerata@anz.com

Important notice

Last updated: 20 February 2024

The opinions and research contained in this document (in the form of text, image, video or audio) are (a) not personal financial advice nor financial advice about any product or service; (b) provided for information only; and (c) general in nature and do not take into account your financial situation or goals.

This document may be restricted by law in certain jurisdictions. Recipients must observe all relevant restrictions.

Disclaimer for all jurisdictions: This document is prepared by ANZ Bank New Zealand Limited (ANZ Centre, 23-29 Albert Street, Auckland 1010, New Zealand). This document is distributed in your country/region by Australia and New Zealand Banking Group Limited (ABN11 005 357 522) (**ANZ**), a company incorporated in Australia or (if otherwise stated), by its subsidiary or branch (herein collectively referred to as **ANZ Group**). The views expressed in it are those of ANZ Economics and Markets Research, an independent research team of ANZ Bank New Zealand Limited.

This document is distributed on the basis that it is only for the information of the specified recipient or permitted user of the relevant website (**recipients**).

This document is solely for informational purposes and nothing in it is intended to be an invitation, solicitation or offer by ANZ Group to sell, or buy, receive or provide any product or service, or to participate in a particular trading strategy.

Distribution of this document to you is only as may be permissible by the laws of your jurisdiction, and is not directed to or intended for distribution or use by recipients resident or located in jurisdictions where its use or distribution would be contrary to those laws or regulations, or in jurisdictions where ANZ Group would be subject to additional licensing or registration requirements. Further, any products and services mentioned in this document may not be available in all countries.

ANZ Group in no way provides any personal financial, legal, taxation or investment advice to you in connection with any product or service discussed in this document. Before making any investment decision, recipients should seek independent financial, legal, tax and other relevant advice having regard to their particular circumstances.

Whilst care has been taken in the preparation of this document and the information contained within is believed to be accurate and made on reasonable grounds on the date it was published, ANZ Group does not represent or warrant the accuracy or completeness of the information. Further, ANZ Group does not accept any responsibility to inform you of any matter that subsequently comes to its notice, which may affect the accuracy of the information in this document.

This document may contain forward looking statements or opinions including statements regarding our intent, belief or current expectations regarding economic and market conditions, financial instruments and credit markets. Such statements are usually predictive in character, may not be accurate once the future becomes known and should not be relied upon when making investment decisions. Past performance is not a reliable indicator of future performance. ANZ does not accept any responsibility to inform you of any revisions to these forward-looking statements to reflect events or circumstances occurring after the date of this document.

Preparation of this document and the opinions expressed in it may involve material elements of subjective judgement and analysis. Unless specifically stated otherwise: they are current on the date of this document and are subject to change without notice; and, all price information is indicative only. Any opinions expressed in this document are subject to change at any time without notice.

ANZ Group does not guarantee the performance of any product mentioned in this document. All investments entail a risk and may result in both profits and losses. Any products and services described in this document may not be suitable for all investors, and transacting in these products or services may be considered risky.

ANZ Group expressly disclaims any responsibility and shall not be liable for any loss, damage, claim, liability, proceedings, cost or expense (**Liability**) arising directly or indirectly and whether in tort (including negligence), contract, equity or otherwise out of or in connection with this document to the extent permissible under relevant law. The contents of this document have not been reviewed by any regulatory body or authority in any jurisdiction.

ANZ Group may have an interest in the subject matter of this document. They may receive fees from customers for dealing in any products or services described in this document, and their staff and introducers of business may share in such fees or remuneration that may be influenced by total sales, at all times received and/or apportioned in accordance with local regulatory requirements. Further, they or their customers may have or have had interests or long or short positions in any products or services described in this document, and may at any time make purchases and/or sales in them as principal or agent, as well as act (or have acted) as a market maker in such products. This document is published in accordance with ANZ Group's policies on conflicts of interest and ANZ Group maintains appropriate information barriers to control the flow of information between businesses within the group.

Your ANZ Group point of contact can assist with any questions about this document including for further information on these disclosures of interest.

Australia. ANZ holds an Australian Financial Services licence no. 234527. For a copy of ANZ's Financial Services Guide please [click here](#) or request from your ANZ point of contact.

Brazil. This document is distributed on a cross border basis and only following request by the recipient. No securities are being offered or sold in Brazil under this document, and no securities have been and will not be registered with the Securities Commission - CVM.

Brunei, Japan, Kuwait, Malaysia, Switzerland, Taiwan. This document is distributed in each of these jurisdictions by ANZ on a cross-border basis.

Cambodia. The information contained in this document is confidential and is provided solely for your use upon your request.

This does not constitute or form part of an offer or solicitation of any offer to engage services, nor should it or any part of it form the basis of, or be relied in any connection with, any contract or commitment whatsoever. ANZ does not have a licence to undertake banking operations or securities business or similar business, in Cambodia. By requesting financial services from ANZ, you agree, represent and warrant that you are engaging our services wholly outside of Cambodia and subject to the laws of the contract governing the terms of our engagement.

Canada. This document is general information only, is intended for institutional use only – not retail, and is not meant to be tailored to the needs and circumstances of any recipient. In addition, this document is not intended to be an offer or solicitation to purchase or sell any security or other financial instrument or to employ a specific investment strategy.

Chile. You understand and agree that ANZ is not regulated by Chilean Authorities and that the provision of this document is not subject to any Chilean supervision and is not guaranteed by any regulatory or governmental agency in Chile.

Important notice

Fiji. For Fiji regulatory purposes, this document and any views and recommendations are not to be deemed as investment advice. Fiji investors must seek licensed professional advice should they wish to make any investment in relation to this document.

Hong Kong. This document is issued or distributed in Hong Kong by the Hong Kong branch of ANZ, which is registered at the Hong Kong Monetary Authority to conduct Type 1 (dealing in securities), Type 4 (advising on securities) and Type 6 (advising on corporate finance) regulated activities. The contents of this document have not been reviewed by any regulatory authority in Hong Kong. If you are in any doubt about any of the contents of this document, you should obtain independent professional advice.

India. If this document is received in India, only you (the specified recipient) may print it provided that before doing so, you specify on it your name and place of printing.

Israel. ANZ is not a holder of a licence granted in Israel pursuant to the Regulation of Investment Advising, Investment Marketing and Portfolio Management Law, 1995 ("Investment Advice Law") and does not hold the insurance coverage required of a licensee pursuant to the Investment Advice Law. This publication has been prepared exclusively for Qualified Clients as such term is defined in the First Schedule to the Investment Advice Law. As a prerequisite to the receipt of a copy of this publication a recipient will be required to provide confirmation and evidence that it is a Qualified Client. Nothing in this publication should be considered Investment Advice or Investment Marketing as defined in the Investment Advice Law. Recipients are encouraged to seek competent investment advice from a locally licensed investment adviser prior to making any investment.

Macau. Click [here](#) to read the disclaimer for all jurisdictions in Mandarin. 澳门。点击[此处](#)阅读所有司法管辖区的免责声明的中文版。

Myanmar. This document is intended to be general and part of ANZ's customer service and marketing activities when implementing its functions as a licensed bank. This document is not Securities Investment Advice (as that term is defined in the Myanmar Securities Transaction Law 2013).

New Zealand. This document is distributed in New Zealand by ANZ Bank New Zealand Limited. The material is for information purposes only and is not financial advice about any product or service. We recommend you seek advice about your financial situation and goals before acquiring or disposing of (or not acquiring or disposing of) a financial product.

Oman. ANZ neither has a registered business presence nor a representative office in Oman and does not undertake banking business or provide financial services in Oman. Consequently ANZ is not regulated by either the Central Bank of Oman (**CBO**) or Oman's Capital Market Authority (**CMA**). The information contained in this document is for discussion purposes only and neither constitutes an offer of securities in Oman as contemplated by the Commercial Companies Law of Oman (Royal Decree 4/74) or the Capital Market Law of Oman (Royal Decree 80/98), nor does it constitute an offer to sell, or the solicitation of any offer to buy non-Omani securities in Oman as contemplated by Article 139 of the Executive Regulations to the Capital Market Law (issued vide CMA Decision 1/2009). ANZ does not solicit business in Oman and the only circumstances in which ANZ sends information or material describing financial products or financial services to recipients in Oman, is where such information or material has been requested from ANZ and the recipient understands, acknowledges and agrees that this document has not been approved by the CBO, the CMA or any other regulatory body or authority in Oman. ANZ does not market, offer, sell or distribute any financial or investment products or services in Oman and no subscription to any securities, products or financial services may or will be consummated within Oman. Nothing contained in this document is intended to constitute Omani investment, legal, tax, accounting or other professional advice.

People's Republic of China (PRC). This document may be distributed by either ANZ or Australia and New Zealand Bank (China) Company Limited (**ANZ China**). Recipients must comply with all applicable laws and regulations of PRC, including any prohibitions on speculative transactions and CNY/CNH arbitrage trading. If this document is distributed by ANZ or an Affiliate (other than ANZ China), the following statement and the text below is applicable: No action has been taken by ANZ or any affiliate which would permit a public offering of any products or services of such an entity or distribution or re-distribution of this document in the PRC. So, the products and services of such entities are not being offered or sold within the PRC by means of this document or any other document. This document may not be distributed, re-distributed or published in the PRC, except under circumstances that will result in compliance with any applicable laws and regulations. If and when the material accompanying this document relates to the products and/or services of ANZ China, the following statement and the text below is applicable: This document is distributed by ANZ China in the Mainland of the PRC.

Peru. The information contained in this document has not been, and will not be, registered with or approved by the Peruvian Superintendency of the Securities Market (Superintendencia del Mercado de Valores, **SMV**) or the Lima Stock Exchange (Bolsa de Valores de Lima, **BVL**) or under the Peruvian Securities Market Law (Legislative Decree 6 861), and will not be subject to Peruvian laws applicable to public offerings in Peru. To the extent this information refers to any securities or interests, it should be noted the securities or interests may not be offered or sold in Peru, except if (i) such securities or interests were previously registered with the Peruvian Superintendency of the Securities Market, or (ii) such offering is considered a private offering in Peru under the securities laws and regulation of Peru.

Qatar. This document has not been, and will not be:

- lodged or registered with, or reviewed or approved by, the Qatar Central Bank (**QCB**), the Qatar Financial Centre (**QFC**) Authority, QFC Regulatory Authority or any other authority in the State of Qatar (**Qatar**); or
- authorised or licensed for distribution in Qatar, and the information contained in this document does not, and is not intended to, constitute a public offer or other invitation in respect of securities in Qatar or the QFC.

The financial products or services described in this document have not been, and will not be:

- registered with the QCB, QFC Authority, QFC Regulatory Authority or any other governmental authority in Qatar; or
- authorised or licensed for offering, marketing, issue or sale, directly or indirectly, in Qatar.

Accordingly, the financial products or services described in this document are not being, and will not be, offered, issued or sold in Qatar, and this document is not being, and will not be, distributed in Qatar. The offering, marketing, issue and sale of the financial products or services described in this document and distribution of this document is being made in, and is subject to the laws, regulations and rules of, jurisdictions outside of Qatar and the QFC. Recipients of this document must abide by this restriction and not distribute this document in breach of this restriction. This document is being sent/issued to a limited number of institutional and/or sophisticated investors (i) upon their request and confirmation that they understand the statements above; and (ii) on the condition that it will not be provided to any person other than the original recipient, and is not for general circulation and may not be reproduced or used for any other purpose.

Singapore. To the extent that this document contains any statements of opinion and/or recommendations related to an investment product or class of investment product (as defined in the Financial Advisers Act 2001), this document is distributed in Singapore by ANZ solely for the information of "accredited investors", "expert investors" or (as the case may be) "institutional investors" (each term as defined in the Securities and Futures Act 2001 of Singapore). ANZ is licensed in Singapore under the Banking Act 1970 of Singapore and is exempted from holding a financial adviser's licence under Section 23(1)(a) of the Financial Advisers Act 2001 of Singapore. In respect of any matters arising from, or in connection with, the distribution of this document in Singapore, please speak to your usual ANZ contact in Singapore.

Important notice

United Arab Emirates (UAE). This document is distributed in the UAE or the Dubai International Financial Centre (**DIFC**) (as applicable) by ANZ. This document does not, and is not intended to constitute: (a) an offer of securities anywhere in the UAE; (b) the carrying on or engagement in banking, financial and/or investment consultation business in the UAE under the rules and regulations made by the Central Bank of the UAE, the Emirates Securities and Commodities Authority or the UAE Ministry of Economy; (c) an offer of securities within the meaning of the Dubai International Financial Centre Markets Law (**DIFCML**) No. 12 of 2004; and (d) a financial promotion, as defined under the DIFCML No. 1 of 200. ANZ DIFC Branch is regulated by the Dubai Financial Services Authority (**DFSA**). The financial products or services described in this document are only available to persons who qualify as "Professional Clients" or "Market Counterparty" in accordance with the provisions of the DFSA rules.

United Kingdom. This document is distributed in the United Kingdom by Australia and New Zealand Banking Group Limited (**ANZ**) solely for the information of persons who would come within the Financial Conduct Authority (**FCA**) definition of "eligible counterparty" or "professional client". It is not intended for and must not be distributed to any person who would come within the FCA definition of "retail client". Nothing here excludes or restricts any duty or liability to a customer which ANZ may have under the UK Financial Services and Markets Act 2000 or under the regulatory system as defined in the Rules of the Prudential Regulation Authority (**PRA**) and the FCA. ANZ considers this document to constitute an Acceptable Minor Non-Monetary Benefits (**AMNMB**) under the relevant inducement rules of the FCA. ANZ is authorised in the United Kingdom by the PRA and is subject to regulation by the FCA and limited regulation by the PRA. Details about the extent of our regulation by the PRA are available from us on request.

United States. Except where this is a FX-related document, this document is distributed in the United States by ANZ Securities, Inc. (**ANZ SI**) which is a member of the Financial Regulatory Authority (**FINRA**) (www.finra.org) and registered with the SEC. ANZSI's address is 277 Park Avenue, 31st Floor, New York, NY 10172, USA (Tel: +1 212 801 9160 Fax: +1 212 801 9163). ANZSI accepts responsibility for its content. Information on any securities referred to in this document may be obtained from ANZSI upon request. This document or material is intended for institutional use only – not retail. If you are an institutional customer wishing to effect transactions in any securities referred to in this document you must contact ANZSI, not its affiliates. ANZSI is authorised as a broker-dealer only for institutional customers, not for US Persons (as "US person" is defined in Regulation S under the US Securities Act of 1933, as amended) who are individuals. If you have registered to use our website or have otherwise received this document and are a US Person who is an individual: to avoid loss, you should cease to use our website by unsubscribing or should notify the sender and you should not act on the contents of this document in any way. Non-U.S. analysts may not be associated persons of ANZSI and therefore may not be subject to FINRA Rule 2242 restrictions on communications with the subject company, public appearances and trading securities held by the analysts. Where this is a FX-related document, it is distributed in the United States by ANZ's New York Branch, which is also located at 277 Park Avenue, 31st Floor, New York, NY 10172, USA (Tel: +1 212 801 916 0 Fax: +1 212 801 9163).

Vietnam. This document is distributed in Vietnam by ANZ or ANZ Bank (Vietnam) Limited, a subsidiary of ANZ.