

# NZ Insight: House prices - impacts from proposed DTI and LVR settings

24 January 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

Andre Castaing or Sharon Zollner for more details.

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

## House prices – impacts from proposed DTI and LVR settings

### Summary

- The RBNZ is proposing introducing debt-to-income (DTI) limits from the second half of this year. The consultation period closes on 12 March, with decisions to be announced mid-year.
- The accompanying slight easing in LVR restrictions may provide modest support to house prices over the second half of 2024, given the DTI limits are unlikely to be binding for some time. However, the RBNZ is not intending to have a big impact on credit conditions overall with these changes and we expect impacts to be small.
- Macroprudential policy can't eliminate the trade-off between risk and credit availability, and DTI restrictions will make it harder for first home buyers to get on the housing ladder, all else equal. But that's true of LVR restrictions as well.

### Summary of proposed policy changes

Yesterday the RBNZ released proposed changes to mortgage lending macroprudential policy for consultation. These policies are intended to reduce the risk of bank failures in the event of a housing market downturn and are unrelated to the RBNZ's inflation-targeting objective.

Loan-to-value (LVR) restrictions, which limit the size of a loan relative to the value of the house, have been around for nearly a decade. The new element is debt to income (DTI) ratio limits, which restrict new bank lending according to a borrower's debt as a multiple of their income. The two types of policy have overlapping impacts on credit availability (see the RBNZ [website](#) for more detail). How binding they are at any given time will depend not only on their calibration, but also the level of interest rates, expected house price growth, and anything else that affects the demand for housing credit. At different points of the cycle only one or the other may be binding, or neither, depending on what the RBNZ is trying to achieve.

The RBNZ has proposed introducing debt-to-income ratio (DTI) restrictions as follows:

- banks cannot lend more than 20% of their lending to **owner-occupiers** with a DTI greater than 6 times income; and
- banks cannot lend more than 20% of their lending to **investors** with a DTI greater than 7 times income.

The introduction of DTIs is not intended to deliver a large shock to credit availability, but rather to change the mix of policies. Therefore, at the same time, the RBNZ intends to ease loan-to-value (LVR) restrictions. The RBNZ proposes that:

- banks may lend up to 20% (previously 15%) of their owner-occupier lending to owner-occupiers with an LVR above 80% (unchanged); and
- banks may lend up to 5% (unchanged) of their investor lending to investors with an LVR above 70% (previously 65%).

The intent is to revise LVR and DTI settings every 12 months, while retaining the flexibility to review more frequently if warranted.

The RBNZ imposes tougher LVR restrictions on investors than owner occupiers because during a housing market downturn, investors are more likely to sell their properties than owner-occupiers. This could further push down house prices, amplifying the risk to the financial system. However, the proposed DTI limit for investors is higher than that for owner occupiers because in the latter case the house typically reliably earns an income as well, meaning higher DTIs can be sustained.

### How does the proposed DTI limit compare with historical lending?

We can't go back and say with any certainty what things would have looked like had DTI limits been in place, because we don't know what the settings would have been, including for the overlapping LVR limits. When Covid hit in early 2020, the LVR restrictions were also suspended for a year, which undoubtedly contributed to the housing market taking off (indeed, the RBNZ ended up scrambling to put the restrictions back on earlier than envisaged). DTI restrictions might well have been suspended too had they been in existence, given the widespread expectation at the time was that double-digit house price falls were in the offing and that the housing market needed all the support it could get.

So we can't produce a 'what would have been' counterfactual. But for the sake of illustration, let's take a look at how the lending over the housing boom compares to the proposed DTIs.

In 2021 when the housing market was booming, the proportion of new owner-occupier lending occurring at a DTI over 6x peaked over 35%, and over 40% for first home buyers, compared to a proposed 20% limit (figure 1). That is, not far off double the proposed limit.

While first home buyers are not explicitly targeted by DTIs, they will be more affected simply because of the fact that first home buyers typically require more borrowing than people who are upsizing or moving (the same is true for LVR restrictions to some extent as well, so the easing of LVR restrictions will make it a touch easier for some first home buyers).

**Figure 1. Percentage of new lending to owner occupiers with a DTI above 6x**



Source: RBNZ, Macrobond, ANZ Research

What about investors? At the peak in 2021, over 40% of new lending to investors was at DTIs above the proposed limit of 7x, compared to a proposed 20% limit (figure 2), ie more than double.

**Figure 2. Percentage of new lending to investors with a DTI above 7x**



Source: RBNZ, Macrobond, ANZ Research

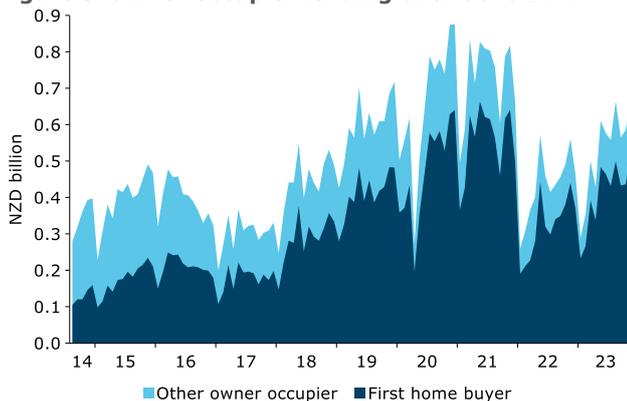
### Potential impacts in 2024

We are **forecasting** a fairly subdued year for the housing market overall, with prices to rise just 4% over 2024. However, we do expect borrowing demand from investors (including at high DTIs) to pick up somewhat as the year progresses, and we expect interest rates to fall. As well as that, interest deductibility is set to be phased back in. So macroprudential settings will certainly not be irrelevant.

Whether LVR or DTI restrictions will have the most significant impact depends not only on their settings, but also on the macroeconomic context. When interest rates are relatively high, the amount most new buyers can borrow is typically limited by their ability to service the mortgage – borrowers couldn’t borrow a huge multiple of their income at the moment in any case. The DTI limits are non-binding in that kind of scenario. On the other hand, when rates are very low and house prices are rising fast, DTIs are likely to be more potent – whereas with LVRs, borrowing capacity still rises as house prices do – which can be a lot faster than rises in incomes.

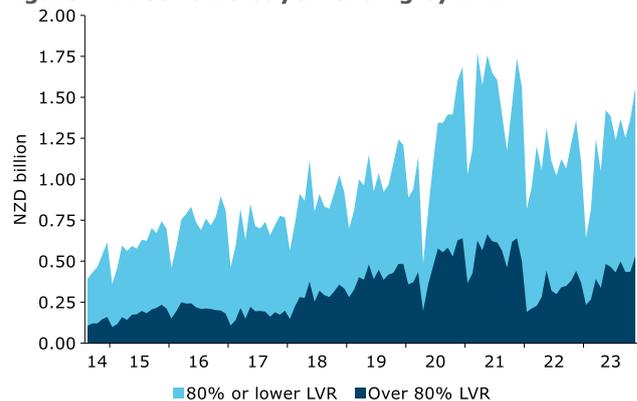
The new DTI limits are unlikely to have much impact on lending this year, as we don’t see them being binding for some time. This is consistent with the RBNZ’s stated intent to calibrate them “so they act as guardrails – in which they are binding during booms but minimally binding during other times.” In our view the associated loosening of LVR settings is likely to provide modest support for house prices from the second half of the year. Figures 3 and 4 show that high-LVR lending is well off its lows for both first home buyers and investors, and figure 5 shows that investor LVR restrictions often tend to be binding – indeed our research has found that tweaks to LVR settings have a significant **impact** on house price inflation.

**Figure 3. Owner occupier lending over 80% LVR**



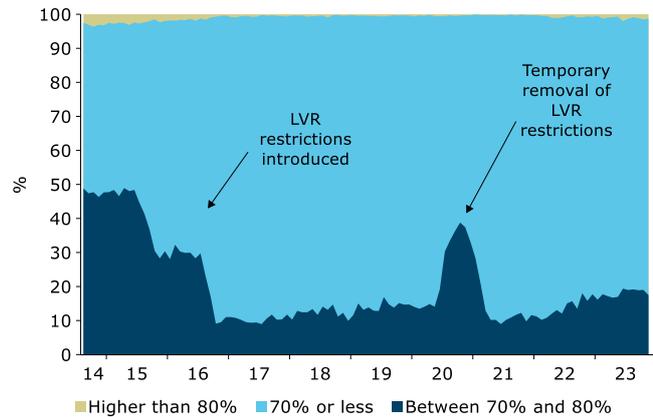
Source: RBNZ, Macrobond, ANZ Research

**Figure 4. First home buyer lending by LVR**



Source: RBNZ, REINZ, Macrobond, ANZ Research

**Figure 5. Share of lending to investors by LVR**



Source: RBNZ, REINZ, Macrobond, ANZ Research

The lift in the investor LVR cap from 65% to 70% will allow investors to acquire more leverage from the same amount of equity – borrowing more and potentially paying more for a property at the same time that the tax changes will, all else equal, lift the expected financial returns from a given rental property.

But the magnitude of the potential impacts is capped. If higher-risk mortgage lending lifts strongly, whether because of the change in the mix of policy settings or for some other reason, it will be limited by the new DTI policy – LVR settings can also be tweaked. In practice, although the RBNZ says the intent is to review macroprudential policy annually, LVR restrictions are likely to be tweaked more often than DTIs, because DTIs are “guardrails” reserved for booms. We expect house prices to rise 4% over 2024 and 5% over 2025 and do not see significant risks to this forecast, [nor our OCR forecast](#), from the proposed changes at this stage.

### Longer-run impacts

It’s important to note that macroprudential tools are intended to influence the amount of higher-risk lending going on to enhance the stability of the financial system, not to enable the RBNZ to target a particular rate of house price inflation. Nor are these monetary policy tools. But given boom times in mortgage lending are typically inflationary times, odds are that attempting to soften the extremes of the credit cycle will seldom be at odds with monetary policy objectives.

It’s not possible to assess the likely impact of macroprudential policy on overall credit growth over time, as we don’t know how these settings will be tweaked after their initial implementation. The new tool does give the RBNZ more options in terms of taking the heat out of riskier lending at the peak of the housing cycle. But it’s not costless: at times, it will make it harder for first home buyers to get on the housing ladder, all else equal. Buying a first house in a very expensive market is by its nature a risky thing to do. No macroprudential tool can eliminate the trade-off between credit risk and credit availability; it can only move the financial system along the curve.



## 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](mailto:sharon.zollner@anz.com)

General enquiries:  
[research@anz.com](mailto: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](mailto: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](mailto: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](mailto: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](mailto:henry.russell@anz.com)



**Andre Castaing**  
Economist

Macroeconomic forecasting, economic developments, housing, trade and monetary policy.

Telephone: +64 21 199 8718  
Email: [andre.castaing@anz.com](mailto:andre.castaing@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](mailto:kyle.uerata@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](mailto:natalie.denne@anz.com)

# Important notice

Last updated: 18 April 2023

**The opinions and research contained in this document (which may be 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) intended to be general in nature and do not take into account your financial situation or goals.**

This document may be restricted by law in certain jurisdictions. Persons who receive this document must inform themselves about and 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 this document 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 contained within 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, ANZ Group does not represent or warrant the accuracy or completeness of the information, except with respect to information concerning ANZ Group. 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.

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. Past performance is not necessarily an indicator of future performance. 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. Please note, 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.

**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

## Important notice

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.

**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](http://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

## Important notice

---

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.