



Sanctions Policy Summary

Why does ANZ have this policy?

As a bank with operations in more than 30 jurisdictions, ANZ must comply with all applicable laws in all of the jurisdictions in which it operates, including requirements of supra-national organisations, such as the United Nations and European Union. This policy sets out ANZ's approach to detection and deterrence of sanctioned parties, jurisdictions and products which may have a connection with ANZ products or services.

This is one of the policies supporting ANZ's Conduct and Ethics policy framework.

How does the Sanctions Policy apply at ANZ?

This policy applies to all employees and contingent workers of Australia and New Zealand Banking Group Limited (ANZ) and controlled entities, including when acting at the Group's direction as a director or in any other capacity.

The implementation of this policy is supported by specific requirements and mandatory training for all employees and contingent workers annually. Breaches of this policy may lead to disciplinary action, including dismissal, as well as criminal, civil or regulatory consequences.

Key obligations

Under this policy ANZ:

- has implemented a risk-based preventive approach, using practises that identify, manage and mitigate sanctions risk in all jurisdictions of ANZ representation
- reserves the right not to process transactions involving certain jurisdictions, products or services; for ANZ policy or risk appetite reasons.
- except in limited and pre-approved circumstances does not enter, or remain involved in, transactions that have any connection directly or indirectly with Cuba, Iran, North Korea, Syria, or the Region of Crimea, including any transactions initiated from these jurisdictions.
- except in limited and pre-approved circumstances does not enter, or remain involved in, transactions that have any connection with some sectors of the economy (e.g. the Energy Sector (Oil, Gas, Petrochemical), Telecommunications, Information Technology and Software, Defence, Intelligence and Security and Aerospace sectors) in some jurisdictions e.g. Belarus, Russia and Venezuela. Other sectors and jurisdictions may be relevant. If in doubt, please discuss with your ANZ Banker.
- does not enter, or remain involved in, a transaction or relationship that directly or indirectly involves a sanctioned party or product
- conducts customer identification and verification activities in proportion to the sanctions risk posed by that customer or product.
- monitors customers for evidence of suspicious activity, and report such activity where it suspects a person may be acting illegally.
- files all reports it deems appropriate with the sanctions regulators in jurisdictions of ANZ representation.
- ensures that third parties acting for ANZ comply with this policy.
- retains all records that may be relevant to this policy at ANZ for a minimum of 7 years.

Role of Compliance

Compliance will:

- provide leadership, guidance, advice and direction to promote compliance with the policy
- ensure effective reporting, escalation and resolution of sanctions compliance issues.

Last Review: August 2021