



ANZ Investments

Stewardship Code Aotearoa New Zealand Report

December 2025

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What is stewardship and what this report shows

Kia ora, and welcome to ANZ New Zealand Investments Limited's (ANZ Investments) 2025 Stewardship Report.

ANZ Investments' approach is closely aligned with the Stewardship Code Aotearoa New Zealand (**the Code**), reflecting the focus we place on stewardship as part of our Responsible Investment Framework. It also reflects our ongoing commitment to being transparent and accountable in how we manage and govern our investment processes.

This stewardship report outlines our stewardship practices and activities over the past year and highlights how we have aligned these with the principles of the Code. In particular, we cover:

- the role of stewardship in our overall responsible investment approach
- the role of stewardship in our climate strategy, and
- our governance structure and its relevance to our responsible investment approach. See [Appendix 1](#) for more information on our governance structures.

What is stewardship?

Stewardship involves the responsible use of influence by investment managers to shape the disclosure and behaviour of investee companies, with the aim of improving the quality of information about what they do and how they do it, ultimately encouraging sustainable business practices and improved corporate conduct over time.

Stewardship supports sound governance and aims to contribute to long-term value creation for the funds we manage. Further information on how stewardship is incorporated into our Responsible Investment approach is disclosed in our [Responsible Investment Framework](#) (RI Framework).

We're proud to be a founding signatory of the Code, supporting the Code's aim to create and preserve inter-generational value for investors, as well as efficiently direct capital where it is most needed for a resilient economy.

This report covers ANZ Investments' stewardship activities, policies and processes across the funds under management (**FUM**) in ANZ Investments' managed investment schemes, superannuation schemes, wholesale schemes, and ANZ Bank New Zealand Limited's Discretionary Investment Management Service.

The [Engagement activities](#) section provides a snapshot of our stewardship activities and engagements for the 12-month period to 30 June 2025.

You can find more information about the Code at www.stewardshipcode.nz.

Why we conduct stewardship

Investment beliefs

Our investment beliefs create a foundation for our investment strategies. In February 2025, the ANZ Investments Board (the **Board**) refreshed our investment beliefs, affirming that “engaging directly or through our partners with the companies we invest in to influence their decisions and activities, including using our voting rights, is an important part of being an active investor. If we believe our engagements will not be successful, we should exit”.

Active investment – control and flexibility

We are an active investor, with the flexibility to implement investments through active and passive strategies. We monitor what’s happening in markets, and we have greater control and flexibility to adjust our investing approach, so our portfolios are resilient to market changes.

When considering our investment mix and specific investments, and when we select external fund managers to implement some of our international investment choices, we take environmental, social, and governance considerations (**ESG**) factors into account.

Using active management means that if we identify ESG risks during or after an investment decision, we have three ways to manage those risks:

1. Avoid them by not selecting the investment (we can also achieve this through exclusion of certain activities, such as tobacco product manufacture).
2. Reduce them by adjusting the size of our investment. If risks emerge after investing that we are not prepared to manage, we can reduce our investment to zero by selling the investments we hold.
3. Accept them but ensure they are well managed by the ANZ investment management team or our external investment partners.

Tākiri-ā-Rangi – ANZ New Zealand Te Ao Māori Strategy

In 2022 ANZ New Zealand (ANZ Investments is a subsidiary of ANZ Bank New Zealand) made a commitment to Māori and to all the people of Aotearoa New Zealand through the launch of [Tākiri-ā-Rangi Te Ao Māori Strategy](#). This sets out ANZ New Zealand’s strategy and work plan to advance Māori business and Māori personal financial well-being. Developing strong relationships with Māori, hapū and iwi across Aotearoa New Zealand is part of ANZ New Zealand’s longstanding purpose. Te Tiriti is our nation’s founding document, and ANZ New Zealand acknowledges the promise made in 1840.

ANZ Investments does not specifically incorporate Te Ao Māori principles into our RI Framework or stewardship approach.

How we conduct stewardship

Stewardship is conducted by the ANZ investment management team or external fund managers investing on our behalf. We do this in two ways:



Engagement

Engagement with the companies we invest in, which could include boards, executives, management, competitors, and stakeholders.



Proxy voting

Voting on company and shareholder resolutions on our investors' behalf.

Engagement

Engagement is the primary focus of our stewardship strategy with investee companies. We actively engage with a number of our investee companies on ESG and other issues. This helps us better understand the risks and opportunities facing investee companies and supports better-informed decision making over the long term.

We engage with investee companies using three main approaches:

1. **Internally managed FUM:** The ANZ investment management team may engage directly with investee companies across New Zealand and some Australian investments. Engagement can include, but is not limited to, meetings with:
 - the company board
 - senior management
 - other key stakeholders.

2. **Externally managed FUM:** ANZ Investments has partnerships with external fund managers, who may engage on our behalf with companies that we have exposure to globally.

To support our oversight, we request a summary of engagement activities from our external fund managers twice a year as at 30 June and 31 December.

3. **Collaborative engagements:** Where appropriate, we may collaborate with other asset managers to engage with companies collectively. This approach allows us to leverage the knowledge, skills and expertise of others who have similar goals.

Many of our external fund managers participate in collaborative engagements through organisations such as Climate Action 100+, where they may join collaborative engagements with investee companies.

Policy engagement

We provide formal feedback on regulations and guidance affecting our investments, often through industry collaborations and third-party memberships that support responsible investment practices.

Our memberships include:

- Financial Services Council (FSC)
- IFRS Sustainability Alliance
- New Zealand Corporate Governance Forum (NZCGF)
- Principles for Responsible Investment (PRI)
- Responsible Investment Association Australasia (RIAA)
- Stewardship Code Aotearoa New Zealand.

You can find more details about these organisations in the 'Our memberships and certifications' section of the [ANZ website](#).

Proxy voting

Proxy voting is another meaningful way to influence decisions impacting the companies we invest in. The ANZ investment management team and our external fund managers vote on company matters according to our investment beliefs and RI Framework.

Internally managed: For investments managed internally, voting is undertaken by the domestic equities team, with support from Institutional Shareholder Services (ISS) as a proxy voting service provider.

Externally managed: For investments managed externally, voting is conducted by the external fund managers who have discretion to vote on our behalf. They may also utilise proxy voting services such as ISS and Glass Lewis to support their voting activities.

Where practical, we aim to vote on all resolutions; however, there may be instances where we do not vote, or choose to 'abstain' from voting, on resolutions.

We have partnered with ISS to make our voting activity publicly available through their Vote Disclosure Services platform.

You can view our [proxy voting records](#) for the following ANZ Investments registered offers:

- ANZ KiwiSaver Scheme
- ANZ Investment Funds
- OneAnswer KiwiSaver Scheme
- OneAnswer Multi-Asset-Class Funds
- OneAnswer Single-Asset-Class Funds
- ANZ Default KiwiSaver Scheme.

The role of stewardship in our climate strategy

Our goal is to reach net zero greenhouse gas emissions by 2050 across all of our FUM, although not on a fund-by-fund basis. This is our 'Net Zero 2050' goal. 'Net zero' means cutting greenhouse gas emissions to as close to zero as possible, with any remaining emissions re-absorbed from the atmosphere.

To reach our goal, we use a stewardship-based approach to decarbonisation. To support progress towards our Net Zero 2050 goal, we also have an interim target to reduce our in-scope¹ FUM Weighted Average Carbon Intensity (WACI) by 50% by 2030.

You can find more details on our Net Zero 2050 goal, interim target and climate strategy in our RI Framework on the [ANZ website](#).

Monitoring, engaging and escalating

As part of our transition plan towards a low-emissions, climate-resilient future, our climate strategy is based on stewardship, engaging with investee companies and external fund managers and using proxy voting to achieve these goals.

We have introduced processes to monitor investee companies' progress towards net zero using the WACI measure and to focus our stewardship efforts on those companies with the greatest carbon emissions.

We recognise that engagement journeys can take many forms, be lengthy, and aren't linear. After three years, we will review the engagement and decide if action needs to be taken – for example, by limiting further investment in, or divesting from, an investee company or adding the company to our exclusions list.

Disclosure and transparency of stewardship activities

Since 2022, we have published voluntary, bi-annual stewardship reports containing engagement activities and outcomes through case studies across our primary engagement themes, and summaries of proxy voting records and activities.

From 2024 we began publishing an annual stewardship report. We also report our stewardship progress, activities and outcomes through other publications such as:

- Principles for Responsible Investment (PRI) Public Transparency Report
- The ISS Proxy Voting Dashboard.

¹ Our 'in-scope FUM' covers the listed equity, listed property and corporate fixed interest asset classes. Cash and derivative assets are not included in our target because there is currently no globally recognised methodology to calculate these emissions. Our interim target considers only the scope 1 and 2 emissions of an investee company, and not investee companies' scope 3 emissions.

Engagement activities

Themes

We identify our primary engagement themes by considering our internal priorities and evaluating our external fund managers' approaches.

Companies are identified as targets for engagement based on ESG factors that may represent a material risk or opportunity for the company and are not being addressed. Resources dedicated to engagement efforts are prioritised based on the materiality of the ESG issue and the level of exposure within portfolios.

The primary engagement themes across ANZ Investments throughout the 12 months to 30 June 2025 were:



Climate change

Engagements relating to climate change could involve greenhouse gas emissions, physical risk, transition risk, energy usage, and renewable energy sources.



Human rights

Engagements relating to human rights could involve labour rights, forced labour and modern slavery in a company's supply chain.



Diversity, Equity and Inclusion

Engagements related to diversity, equity and inclusion could include addressing a lack of diversity at varying levels of a company, discouraging pay gaps, or ensuring more inclusive and supportive policies and practices regarding minorities, indigenous cultures, and the LGBTQIA+ community.



Biodiversity

Engagements related to biodiversity could include natural capital, water stress, and species abundance.



Corporate governance

Engagements related to the operations of a company's board may include its independence, compensation, remuneration, and conflicts of interest.

Strategic engagement summary

The table on the next page gives a snapshot of our engagements through the year, which are explained in greater detail in the section that follows. Please note that this is not the full scope of engagements undertaken during the year, but rather an example to illustrate how ANZ Investments utilises stewardship in its responsible investment approach.

Company	Engagement manager	Engagement theme	Engagement focus
Infratil Limited	ANZ investment management team	Climate change	Net zero ambition, and status within the Paris Aligned Investing Initiative Net Zero Investment Framework (PAII-NZIF).
Auckland International Airport Limited	ANZ investment management team via collaborative engagement	Climate change	Climate-related risks and opportunities, particularly in the context of industry-wide decarbonisation and adaptation planning.
Intuitive Surgical, Inc.	Franklin Templeton ³	Climate change	Long-term carbon reduction strategy, and potential adoption of Science Based Targets initiative (SBTi) methodologies.
American Electric Power Company, Inc.	Maple-Brown Abbott via collaborative engagement	Climate change	Climate strategy and disclosure – net-zero ambition reassessment, Carbon Disclosure Project (CDP) reporting and clean energy messaging.
Digital Realty Trust, Inc.	Resolution Capital	Human rights	Policy alignment with international human rights standards, particularly in regions experiencing water stress.
Amazon.com, Inc.	Vontobel ⁴	Diversity, Equity and Inclusion	Change in Diversity, Equity, and Inclusion (DEI) language in Amazon’s public disclosures.
Tokyo Electron Ltd.	Northern Trust	Diversity, Equity and Inclusion	Representation of women in management positions, and workforce gender pay gap.
Nestlé S.A.	Vontobel ⁴	Biodiversity	Implementation of the EU deforestation regulations.
Apple Inc.	Northern Trust	Corporate governance	Maintaining cybersecurity and data privacy practices, with the expanded use of AI.
Qantas Airways Limited	External fund manager	Corporate governance	Long-term engagement about governance and operations concerns.
Broadridge Financial Solutions, Inc.	Franklin Templeton ³	Climate change and corporate governance	Multiple engagements covering Broadridge’s commitment to the Science Based Targets initiative (SBTi), and the responsibilities of the Lead Independent Director (LID).

Internally managed engagements

Infratil Limited

Engagement theme: Climate change

Engagement focus: Examining Infratil's net-zero ambition and status relative to the Paris Aligned Investing Initiative Net Zero Investment Framework (PAII-NZIF)

The ANZ investment management team completed an in-person engagement with Infratil's Director of Sustainability, Risk and Funding.

We identified Infratil as a key company for climate engagement due to its current 'Not Aligned' status with the PAII-NZIF, and moderate scope 1 and 2 carbon emissions intensity within our portfolio.

The PAII-NZIF framework has five categories based on investee companies' progress to net zero. The categories are Achieving, Aligned, Aligning, Committed to Aligning, and Not Aligned. For an investee company to be assessed as Achieving, Aligned, or Aligning, it must be investing in or adapting its strategy to address climate-related risk and opportunities.

Infratil recently released its climate statements, setting interim SBTi targets with a plan to meet them. However, the company did not commit to a net-zero ambition. During our in-person engagement, the Director of Sustainability, Risk and Funding explained Infratil's view that short-term targets are more rigorous than long-term ambitions, noting that many companies commit to 2050 goals without clear implementation plans. The company also highlighted the difficulty of setting a net-zero ambition due to the ongoing development of financial institution guidance via SBTi. Infratil was receptive to feedback and expressed interest in our views on their climate statement.

We conveyed our appreciation for the clarity and efficiency of their climate statements, which consolidate key information in a user-friendly format. We acknowledged their interim SBTi targets and current performance against them.

We will continue to monitor the company's progress, particularly regarding its approach to setting a 2050 net-zero ambition once SBTi guidance is finalised.

Auckland International Airport Limited

Engagement theme: Climate change via collaborative engagement

Engagement focus: Climate-related risks and opportunities, particularly in the context of industry-wide decarbonisation and adaptation planning.

Initiative: The ANZ investment management team participated in the Investor Group on Climate Change (IGCC), alongside other New Zealand-based investors. Auckland Airport was selected for engagement due to its demonstrated progress on climate issues and its constructive approach to investor engagement.

The engagement began in early 2025 and involved direct conversations with Auckland Airport's senior leadership and subject matter experts. This was part of a broader collaborative effort to support climate resilience and decarbonisation across the infrastructure sector.

The engagement focused on encouraging Auckland Airport to strengthen its climate strategy.

Key recommendations included developing clearer scope 3 emissions pathways, enhancing advocacy for industry-wide decarbonisation, and improving adaptation planning to address long-term climate risks.

During the meeting, investors shared recommendations aimed at helping the company – and the broader sector – better manage climate-related risks on behalf of clients. Auckland Airport responded positively, acknowledging the value of the discussion and the relevance of the recommendations.

The company demonstrated a willingness to continue collaborating with the investor group and expressed interest in further dialogue on these topics. A follow-up engagement is planned within the next year to assess progress and continue supporting the company’s climate strategy.

Externally managed engagements

Intuitive Surgical, Inc.

Engagement theme: Climate change

Engagement focus: Long-term carbon reduction strategy, and potential adoption of Science Based Targets initiative (SBTi) methodologies.

Intuitive Surgical is an American biotechnology company that develops and manufactures products to be used for robotic-assisted surgical solutions and invasive care.

Our current focus is on understanding the company’s long-term carbon reduction strategy, the development of its climate transition plan, and the potential adoption of SBTi methodologies.

Our external fund manager, Franklin Templeton³, engaged with Intuitive Surgical’s Investor Relations (IR) team to obtain an update on the company’s carbon reduction initiatives. In its 2023 Carbon Disclosure Project (CDP) report, Intuitive Surgical stated that it is evaluating opportunities to reduce its carbon footprint over the long term and is currently working on a climate transition plan. The report also indicated that the company may align its efforts for direct emissions with SBTi methodologies.

During the engagement, IR confirmed that setting SBTi targets remains under consideration and acknowledged the challenges associated with establishing long-term targets. IR also noted that other investors have expressed interest in the company’s SBTi alignment.

Franklin Templeton expects to continue to monitor Intuitive Surgical’s environmental initiatives and review the company’s next sustainability report to assess progress on its climate transition planning and potential SBTi target adoption.

American Electric Power Company, Inc.

Engagement theme: Climate change via collaborative engagement

Engagement focus: Climate Strategy and Disclosure – net-zero ambition reassessment, Carbon Disclosure Project (CDP) reporting and clean energy messaging.

Initiative: Climate Action 100+ (CA100+), with one of our external fund managers, Maple-Brown Abbott, acting as co-lead engager.

Engagements with American Electric Power (AEP) primarily focused on the growing risk that the company may retreat from its sustainability and decarbonisation commitments.

This concern was heightened by comments from the company about reviewing its net zero by 2045 target – primarily driven by rising electricity demand, regulatory fragmentation across states and a changing political environment. AEP has simultaneously shifted its public messaging to emphasise reliability and resilience, as opposed to sustainability and decarbonisation.

AEP’s decision not to submit a 2024 CDP report – an essential source of emissions reporting for investors – was a particular focus, arising from a concern the move represented a potential reduction of AEP’s broader climate and emissions transparency. The company cited concerns over potential misrepresentation of its effort and outcomes in the CDP reporting outputs.

Maple-Brown Abbott, alongside other investors, encouraged AEP to reaffirm its decarbonisation targets, resume CDP reporting and maintain open engagement with stakeholders. Clearer communication around clean energy incentives and the use of terms such as “aspirational goals” was also recommended to prevent ambiguity and misinterpretation.

Maple-Brown Abbott also raised concerns about the EPRI SMARTargets methodology for emissions target-setting (an initiative by the Electric Power Research Institute (EPRI)), highlighting its limitations and advocating for more credible and robust approaches. Maple-Brown Abbott subsequently shared their consultation feedback to EPRI with AEP in the form of a formal letter addressed to the Head of Sustainability and a member of the Board.

Further engagement is planned following the release of AEP’s updated strategy in Q4 2025. Key areas of focus will include climate risk disclosures, energy mix planning and flexible capacity solutions. The engagement remains active and will continue to be closely monitored to ensure AEP’s climate commitments remain aligned with investor expectations and net zero pathways.

Digital Realty Trust, Inc.

Engagement theme: Human rights

Engagement focus: Policy alignment with international human rights standards, particularly in regions experiencing water stress.

Our external fund manager, Resolution Capital, began engagement directly with Digital Realty (DLR) in June 2025 through dialogue with their sustainability team and participated in proxy voting on a shareholder proposal presented at their Annual General Meeting (AGM).

The engagement centred on a shareholder resolution requesting that DLR adopt a formal policy recognising the human right to water. The proposal called for alignment with international human rights standards and the implementation of initiatives to reduce water usage, particularly in regions experiencing water stress.

This shareholder proposal was notable because it addressed an issue Resolution Capital had not previously encountered in their proxy voting history. Data centres are known to consume significant amounts of water for cooling, and the proponent argued that DLR – as one of the world’s largest data centre operators – should take a more formal and transparent approach to water stewardship. DLR recommended voting against the proposal, stating that the company had already taken substantial steps to reduce water consumption.

Since 2013, all new data centres developed by DLR have been water-free. Currently, three out of four of their data centres do not use water, and where water is used, it is typically in older, less energy-dense facilities. Additionally, 45% of the water used in their operations comes from municipal wastewater sources.

After reviewing the company’s existing practices and commitments, Resolution Capital agreed with DLR’s recommendation and voted against the proposal. The resolution ultimately received 10% support from shareholders.

DLR has demonstrated a strong commitment to reducing water consumption through its operational practices and infrastructure design. While the shareholder proposal did not pass, the engagement provided an opportunity to review and affirm the company’s environmental strategy. Resolution Capital will continue to monitor DLR’s disclosures and stakeholder engagement efforts.

Amazon.com, Inc.

Engagement theme: Diversity, Equity and Inclusion

Engagement focus: Change in Diversity, Equity, and Inclusion (DEI) language in Amazon’s public disclosures.

Amazon was one of the large US headquartered companies who changed their DEI language in their public disclosures, following the change in US government administration. There is also concern surrounding their approach to climate-related risks.

Our external fund manager, Vontobel³, had a direct meeting with Amazon to understand the implications of changes in DEI language in Amazon’s public disclosures, and to assess the company’s approach to climate-related risks, particularly data centre power usage.

Following the inauguration of President Trump, many US-domiciled companies modified or removed DEI language from their public documents. In a review of companies held within our US equity strategy, 46% of those who had included DEI language in their 2023 annual reports had removed it in 2024. Vontobel engaged with each of these companies to understand the potential impacts, including Amazon. Among other ESG-related topics discussed, DEI was raised explicitly.

While Vontobel does not believe the changes materially impact Amazon’s DEI initiatives, they expect to continue to monitor any further developments to ensure Amazon maintains responsible and transparent practices.

Tokyo Electron Ltd.

Engagement theme: Diversity, Equity and Inclusion

Engagement focus: Representation of women in management positions, and workforce gender pay gap.

Tokyo Electron Ltd (TEL) operates in the development, manufacturing, and sale of semiconductor production equipment and industrial electronics products.

Founded in 1963, TEL is headquartered in Tokyo, Japan. Through direct engagement, our external fund manager, Northern Trust Asset Management (Northern Trust), recommended TEL to promote workforce diversity, equity, and inclusion. The focus included increasing the representation of women in managerial roles and addressing the gender pay gap.

TEL faces a notable gender imbalance, with women comprising only 15.7% of its workforce in FY24. Northern Trust advised the company to disclose initiatives aimed at fostering a diverse workforce, such as mentorship programmes, targeted recruitment, gender pay transparency, and measures to close the pay gap. TEL had previously set a goal to raise the proportion of women in management from 6.3% in FY24 to 8% by 2027, and stated a 7% gender pay gap, attributing it to differences in experience between male and female employees. It was further recommended that all key performance indicators and related initiatives be reported to improve transparency.

TEL has acknowledged the recommendations to disclose relevant measures and data to promote workforce diversity. Northern Trust will maintain ongoing engagement with TEL to track progress on enhancing diversity, equity, and inclusion.

Nestlé S.A.

Engagement theme: Biodiversity

Engagement focus: Nestlé's implementation of the EU deforestation regulations.

The engagement focused on biodiversity and deforestation, specifically Nestlé's progress on the EU Deforestation Regulation.

This engagement was conducted as part of our external fund manager, Vontobel's⁴, diversity campaign and the enforcement of the EU Deforestation Regulation in 2023 through a multi-year and ongoing thematic engagement initiative. For Nestlé, this was focused on their efforts in tracking and verifying cocoa sourcing.

Nestlé shared that they have been actively working on deforestation issues since 2010 and believe they are ahead of industry peers. However, cocoa remains a challenging area. Most of their cocoa has been tagged to specific farms, but the complexity arises at the processing plant level. To address this, Nestlé is working on purchasing consolidation and implementing DNA tracing technologies to improve traceability and compliance.

Nestlé's proactive approach and transparency in addressing deforestation challenges, especially in cocoa sourcing, are encouraging. Vontobel expects to monitor Nestlé's progress as part of its ongoing thematic engagement efforts.

Apple Inc.

Engagement theme: Corporate governance

Engagement focus: Maintaining cybersecurity and data privacy practices, with the expanded use of AI.

Given the nature of Apple’s products, which handle and store large volumes of personal data, the company must maintain exemplary cybersecurity and data privacy practices, especially as it expands its AI capabilities.

Ahead of Apple’s AGM, our external fund manager, Northern Trust Asset Management (Northern Trust) engaged in direct dialogue with the company to discuss data privacy in the context of its AI strategy. This was in preparation for voting on a shareholder proposal regarding AI-related data usage risks.

The focus of the engagement was to understand Apple’s approach to data privacy, particularly in relation to its AI strategy. Northern Trust inquired about how Apple’s privacy strategy applies to its partnerships, especially with OpenAI, and to its internally developed AI capabilities.

During the engagement, Apple demonstrated the safety of its first-party platform and confirmed that it does not share user information with OpenAI. The company emphasised its thorough approach to implementing guardrails around user data. Apple has also publicly disclosed its Responsible AI principles, which guide the development of Apple Intelligence and support its commitment to protecting user data. Despite these assurances, Northern Trust recognises that the AI space presents unprecedented risks that require ongoing monitoring from a shareholder perspective.

As a result of the engagement, Northern Trust gained confidence that Apple’s current policies and procedures adequately address the concerns raised in the shareholder proposal. This resulted in voting against the proposal, which ultimately received just under 12% shareholder support. Northern Trust will continue to monitor Apple’s data privacy and security practices, as well as adherence to its Responsible AI principles, as the company advances its AI strategy and releases new features.

Qantas Airways Limited

Engagement theme: Corporate governance

Engagement focus: Qantas’ governance and operations. This was conducted over a long-term engagement period.

While our external fund manager’s initial engagements with Qantas predate this, in 2023 the engagement focus intensified following a series of well-publicised governance and operational failures.

In 2023, our external fund manager advocated for renewal at both management and board levels to address regulatory issues and brand damage. Shortly after, in September 2023, Vanessa Hudson was appointed CEO, demonstrating strong operational performance and improved stakeholder management. Board renewal followed, including the appointment of John Mullen as Chair and other retirements.

In July 2025, our external fund manager engaged with Qantas regarding a cybersecurity breach involving a third-party customer service platform. The breach was executed using AI-powered impersonation. Qantas confirmed that no sensitive financial or login data was compromised. They have also implemented additional security measures, increased surveillance, and enhanced cyber awareness in call centres. The board and management are overseeing the investigation and will provide updates as the situation evolves.

A variety of specific issues were also addressed and resolved including:

- **Flight credits:** Qantas had faced criticism for delays and lack of transparency in refunding or allowing use of flight credits issued during COVID-19 disruptions. This was resolved through permanently extended flight credits and improved customer return efforts.
- **Remuneration:** Executive pay had been historically controversial, with concerns over high bonuses despite service issues, job cuts and legal disputes. In August 2024, Qantas announced it was clawing back \$9m from the previous CEO [prior to Vanessa Hudson]. It improved the remuneration structure to allow greater scope for future claw-back. It also reduced the short-term bonuses of other current and former executives and non-executive directors.
- **Issue of cancelled flights:** Qantas has been accused of selling tickets on flights that had already been cancelled, leading to regulatory scrutiny and customer frustration. Qantas settled the ACCC inquiry in May 2024 for a payment of \$120m, comprising of \$100m fine and \$20m in customer remediation. The settlement avoided a protracted court case with the ultimate financial impact, while material, being within management expectations.

Qantas has demonstrated a substantial and effective governance improvement programme. The company has addressed each issue with appropriate actions, including leadership changes, customer-focused investments, and enhanced oversight mechanisms. The cybersecurity breach response was prompt and thorough, with no evidence of sensitive data misuse. Our external fund manager has gained confidence in Qantas, and believes the company is in a stronger position, with reduced risk of future governance failures. They will continue to monitor the company's progress and maintain engagement as necessary.

Broadridge Financial Solutions, Inc.

Engagement theme: Climate change and corporate governance

Engagement focus: Multiple engagements covering Broadridge's commitment to the SBTi, and the responsibilities of the Lead Independent Director (LID).

Our external fund manager, Franklin Templeton³, conducted direct engagement with Broadridge's Investor Relations (IR) team on multiple occasions over the past twelve months. These engagements were focused on its climate strategy and governance structure, specifically the company's SBTi commitment and board leadership practices.

Franklin Templeton inquired about Broadridge's commitment to the SBTi, which was going to expire soon. Companies have two years to submit targets for approval once formally committing to pursue SBTi approval of reduction targets. IR said that the company had submitted targets two months ago, and that the approval was still pending. A few weeks later, the approval of the targets was confirmed on the SBTi's website.

Additional engagement was undertaken regarding the responsibilities of the LID. Our external fund manager typically prefers companies to have an independent chair of the board, but believes that a LID with robust responsibilities can help ensure alignment between shareholders' and management's interests (proxy advisory firms Glass Lewis and ISS have the same view on this matter). Franklin Templeton spoke with Broadridge to gain clarity on the LID's responsibilities and, after the conversation, were confident that the LID's responsibilities are consistent with best practice.

Franklin Templeton was pleased that Broadridge followed through on its commitment to SBTi and was satisfied with the clarity provided regarding the LID role and responsibilities. The external fund manager expects to continue monitoring Broadridge's progress on climate targets and its governance practices.



Disclosure of our voting activity

Proxy voting activity

1 July 2024 to 30 June 2025

Voting summary	No.
For	7,434
Against/withhold	681
Abstain	57
Did not vote	112
One year	7
Voted	8,179
Unique proposals	8,165

Over the 12-month period, across 8,165 unique proposals available to vote, we voted 681 against management (8.3%).

Shareholder proposals	No.	%
Company articles	17	5.0%
Compensation	22	6.5%
Corporate governance	27	7.9%
Audit related	5	1.5%
Non-routine business	4	1.2%
Routine business	12	3.5%
Director election	13	3.8%
Directors related	37	10.9%
Miscellaneous	29	8.5%
Environmental & social (blended)	38	11.2%
Environmental	62	18.2%
Social	74	21.8%
Total	340	100.0%

Of the 340 shareholder proposals over the 12-month period, 174 were related to environment and social issues (51.2%), with the remaining 166 related to governance issues (48.8%).

Company meetings by country	No.	%
Australia	47	7.9%
New Zealand	38	6.4%
United States	214	35.9%
United Kingdom	31	5.2%
Other	266	44.6%
Total	596	100.0%

Over the 12-month period, most meetings were related to companies in the USA (35.9%).

Voting by sector	No.	%
Real estate	70	11.8%
Industrials	85	14.3%
Information technology	64	10.8%
Financials	108	18.2%
Materials	32	5.4%
Consumer discretionary	48	8.1%
Health care	61	10.3%
Consumer staples	37	6.2%
Utilities	37	6.2%
Energy	22	3.7%
Communication services	31	5.2%
Total	595	100.0%

Over the 12-month period, most meetings were related to companies in the financial sector (18.2%).

You can view the full proxy voting records for the following investment funds and schemes via the ANZ Investments [Responsible Investment page](#):

- ANZ KiwiSaver Scheme
- ANZ Investment Funds
- OneAnswer KiwiSaver Scheme
- OneAnswer Multi-Asset-Class Funds
- OneAnswer Single-Asset-Class Funds
- ANZ Default KiwiSaver Scheme.

Voting commentary

Voting against management: Alphabet Inc.

At Alphabet's annual meeting, fourteen items were on the ballot, thirteen of which were shareholder proposals. Several proposals focused on AI, an area where Alphabet has extensive experience.

One proposal called for a report on the risks of improper use of external data in AI development. Our external fund manager, Vontobel⁴, voted against this proposal, as Alphabet already operates a comprehensive and auditable system for tracking its AI assets, including detailed lineage of data usage. This system is designed to meet potential future regulatory requirements, which Vontobel viewed as making the proposal largely redundant.

Another AI-focused proposal requested a human rights impact assessment of AI-driven targeted advertising. While the topic is important, Vontobel was of the view that the proposal made broad assertions without sufficient backing. Alphabet has been employing AI in its core search business since the introduction of RankBrain in 2015, demonstrating a long history of responsible AI integration. On this basis, we judged additional reporting unnecessary at this time.

Other proposals addressed child safety and lobbying activities. One requested disclosure of lobbying efforts related to online child safety legislation.

While the intent of the proposal was well-meaning, we noted that some cited legislative examples, such as the KOSA Act, contained material flaws. Vontobel believed investors would be better served focusing on the company's policies and measurable outcomes, such as YouTube's child safety metrics, rather than lobbying activity.

Voting in line with management: PepsiCo, Inc.

PepsiCo's annual meeting presented seven numbered proposals, four of which were shareholder initiatives that our external fund manager, Vontobel⁴, supported. These proposals focused on product safety, social equity, environmental risk, and packaging sustainability.

Specifically, Vontobel supported requests for a third-party assessment of non-sugar sweeteners, a third-party racial equity audit, a report on biodiversity and nature loss risks, and a report on plastic packaging. By supporting these initiatives, they show they believe these proposals provide critical transparency for investors seeking to understand the company's long-term ESG performance. Access to this information enables a more thorough assessment of potential financial and reputational risks, including regulatory changes, fines, and taxes.

As a leading global consumer goods company, PepsiCo is well-positioned to demonstrate leadership in sustainability and social responsibility. Vontobel believes these reporting initiatives give investors meaningful insights into the company's approach to long-term environmental and social challenges.

Active stewardship

Beyond voting, our external fund manager, Vontobel⁴, engaged directly with management at both Alphabet and PepsiCo to communicate our voting policies and rationale. These discussions reinforced their role as active stewards, allowing Vontobel the opportunity to provide feedback on governance, ESG practices, and long-term risk management in a constructive way. Engagement with portfolio companies and related entities on substantive issues that have material relevance to our clients' interests will continue.



Appendix 1:

Governance

The Board is responsible for overseeing and setting ANZ Investments' overall approach to responsible investment (including stewardship). The Board has specific responsibility for overseeing responsible investment risks and opportunities.

The Board delegates operational responsibility for assessing and managing responsible investment to Management as part of its management of the day-to-day business and affairs of ANZ Investments.

Key roles, relating to the oversight and implementation of our responsible investment approach (including stewardship) are as follows:

Roles	Responsibilities
Managing Director, Funds Management	Has delegated responsibility from the Board, including powers for managing, directing, and supervising the management of the day-to-day business and affairs of ANZ Investments.
Chief Investment Officer	Is ultimately accountable for applying responsible investment strategies to the FUM, with oversight from the Board.
Head of Investment Partnerships	Leads the design, development, and integration of responsible investment throughout the investment process. Leads a team that provides specialist responsible investment support to the wider investment management team and undertakes engagement with investee companies.
Investment management team	Integrates responsible investing into the different investment desks and research across ANZ Investments.

We have several internal management committees (forums) that contribute to our oversight of responsible investment (including stewardship):

Roles	Responsibilities
Investment Management Governance Forum (IMGF)	<p>Provides oversight of investment performance and investment risk management (including stewardship approach and broader responsible investment risks).</p> <p>From 25 September 2025, the role of IMGF was revised to support decisions on responsible investment, including ANZ Investment’s responsible investment philosophy and processes. It does not make investment/portfolio decisions (see Investment Committee).</p>
Responsible Investment Forum (RIF)	<p>Responsible for the strategy and implementation of our responsible investment philosophy (which includes stewardship) and commitment to industry bodies such as the Code and the Responsible Investment Association Australasia (RIAA).</p> <p>From 25 September 2025, the RIF was disestablished. The Investment Committee will be responsible for investment-related matters (e.g. responsible investment matters that directly affect stewardship activities).</p>
Temporary Investment Committee (TIC)	<p>The TIC is responsible for endorsing key investment decisions prior to recommendation to the Board. The TIC also endorses the appointment or termination of external fund managers before approval by the CIO (in consultation with the Managing Director). External fund managers’ stewardship practices are a factor taken into account in these decisions.</p> <p>From 25 September 2025, the TIC was disestablished.</p>
Investment Committee (IC)	<p>The IC was established on 25 September 2025 and has a key strategic management role overseeing ANZ Investments’ investment-related activities, including responsible investment, ensuring alignment with our investment beliefs. The IC continues to endorse key investment decisions prior to recommendation to the Board. The IC will continue to endorse the appointment or termination of external fund managers.</p>

Conduct

The ANZ Group Code of Conduct describes how we work at ANZ and sets expected standards of behaviour consistent with our purpose – “to shape a world where people and communities thrive”. The Code of Conduct supports our values of integrity, collaboration, accountability, respect and excellence, and helps us to make fair, balanced and ethical decisions in our day-to-day work.

Our Conflicts of Interest Policy forms part of our Code of Conduct. It provides a globally consistent approach to identification and management of conflicts of interest across the ANZ Group.

Appendix 2:

Disclaimers

Franklin Templeton

³ Franklin Templeton and Franklin Equity Group (together referred to as Franklin Templeton) have provided information about how they manage climate-related risks and have consented to being named in this report in the form and context in which they are named. Franklin Templeton have not issued this report or caused the report to be issued. Franklin Templeton makes no recommendation or warranty as to the completeness or appropriateness of any information contained in this report and do not endorse, recommend, or guarantee the performance of the funds. Franklin Templeton expressly disclaim responsibility for, and make no representation, and give no warranty, assurance, or guarantee, as to the accuracy, completeness, or reliability of any contents of this report.

Vontobel

⁴ Vontobel Asset Management has provided selected information relating to its climate-risk management practices and ESG engagement activities, and has permitted its name to appear in this report only within that specific context. The report itself has been compiled, produced, and issued entirely by parties other than Vontobel Asset Management. Nothing herein should be interpreted as advice, endorsement, or an indication that Vontobel Asset Management has verified the relevance, accuracy, or sufficiency of the content. Vontobel Asset Management does not recommend or guarantee the performance of any funds referenced and assumes no responsibility for the precision, completeness, or reliability of any material contained in this report.

ANZ New Zealand Investments Limited is the issuer and manager of the ANZ KiwiSaver Scheme and the OneAnswer KiwiSaver Scheme. You can download a copy of the guide and product disclosure statement from anz.co.nz/kiwisaverforms.

ANZ New Zealand Investments Limited is the issuer and manager of the ANZ Default KiwiSaver Scheme. The scheme is no longer a default scheme and is closed to new members. Important information about the ANZ Default KiwiSaver Scheme is available at anz.co.nz/kiwisaverforms and by searching 'ANZ Default KiwiSaver Scheme' on the offer register at disclose-register.companiesoffice.govt.nz.

ANZ New Zealand Investments Limited is the issuer and manager of the ANZ Investment Funds, the OneAnswer Multi-Asset-Class Funds and the OneAnswer Single-Asset-Class Funds. You can download a copy of the guide and product disclosure statement from anz.co.nz/investmentforms.

This material is current as of the end of the 12-month period covered and is subject to change. This material is for information purposes only. We recommend seeking financial advice about your situation and goals before getting a financial product.

