

ANZ ESG REPORTING GRI CONTENT INDEX 2019

The ANZ 2019 ESG Supplement is prepared in accordance with the Global Reporting Initiative (GRI) Standards: Comprehensive option, including the GRI G4 Financial Services Sector Disclosures.

This GRI Content Index focuses on our disclosures relating to our most material issues and indicates the sections of our **2019 ESG Supplement**, **2019 Annual Report**, **2019 Climate-related Financial Disclosures** and **2019 Corporate Governance Statement** where we have made the relevant disclosures.

WHAT MATTERS MOST

Through our annual materiality assessment we engage with internal and external stakeholders to inform our identification of ESG risks and opportunities. We seek to identify those issues that have the most potential to impact our ability to operate successfully and create value for our stakeholders. These issues may change over time, reflecting changes in our business and external operating environment and the expectations of stakeholders. We use the results of the assessment to inform our strategy.

This year, we focused our assessment solely on fairness and ethical conduct, which has been ranked as our most material issue for the last three years. We have drawn on our 2018 materiality assessment to help guide the content of our reporting. The key steps in our 2019 materiality process, as well as the full list of our material issues, are discussed in detail in our **2019 ESG Supplement**.

In 2018, stakeholders ranked the following issues (risks or opportunities) as having the most potential to impact our value creation in the short-, medium- and long-term:

| Issue | Definition | Applicable GRI Standard | Impact boundary |
|-------------------------------------|---|---|---|
| Fairness and ethical conduct | A strong corporate culture, known for ethics, values, fairness and transparency. Simple and understandable products and communications (ie. product disclosure, including bank fees and charges) and appropriate hardship/collections policies. | 102: General Disclosures 2016 (102-16, 102-17) 205: Anti-corruption 2016 | External (shareholders, customers, communities) Internal (employees) |
| Fraud and data security | Policies and processes in place to prevent fraud and protect customer data and privacy. Includes customer access to personal data. | 418: Customer Privacy 2016 | External (customer) Internal (employees) |
| Customer experience | Delivering value and improved customer experience through appropriate financial products and services for all customers, small business and personal. | We report on ANZ-specific indicators | External (customers) |
| Corporate Governance | Appropriate governance frameworks in place (ie. processes and policies, including those relating to risk management, executive remuneration and accountability) to ensure ANZ is managed in the long-term interests of stakeholders. | 102: General Disclosures 2016 (102-16 to 102-44) | External (shareholders, customers, communities) Internal (employees) |
| Digital innovation | Keeping pace with digital innovation to ensure we are offering our customers competitive and convenient products and services in a rapidly changing market. | We report on ANZ-specific indicators | External (customers) |

Disclosures in our **2019 ESG Supplement** on material issues rated as 'lower priority' by our stakeholders in 2018 have also been developed with consideration of the applicable GRI Standards however are not included in this content index. These include issues such as anti-money laundering and terrorism financing, responsible business lending, diverse and inclusive workforce, financial wellbeing and investing in the community.



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2019 ESG Supplement



2019 Annual Report



2019 Climate-related
Financial Disclosures



2019 Corporate
Governance Statement

GENERAL DISCLOSURES

| GRI Standard | Disclosure title | ANZ response |
|--|--|---|
| GRI 102: General Disclosures 2016 | | |
| 102-1 | Name of the organization | Australia and New Zealand Banking Group |
| 102-2 | Activities, brands, products, and services | 2019 Annual Report , About our business (p.8) 2019 Annual Report , Our strategy (p.9) 2019 Annual Report , How we create value (p.10-11) |
| 102-3 | Location of headquarters | 833 Collins Street, Docklands, Victoria, Australia |
| 102-4 | Location of operations | 2019 Annual Report, Our international presence and earning composition by geography (p.229) |
| 102-5 | Ownership and legal form | ANZ is a publicly listed company, and was incorporated on 14 July 1977 in Australia. Australia and New Zealand Banking Group Limited is the main holding and operating company for the Group. |
| 102-6 | Markets served | 2019 Annual Report , Our international presence and earning composition by geography (p.229) 2019 Annual Report , About our business (p.8) 2019 Annual Report , Our divisions (p.21-23) |
| 102-7 | Scale of the organization | 2019 Annual Report , Our international presence and earning composition by geography (p.229) 2019 Annual Report , About our business (p.8) 2019 Annual Report , Our strategy (p.9) 2019 Annual Report , Our divisions (p.21-23) 2019 Annual Report , Performance overview (p.52-65) 2019 Annual Report , Income statement (p.102) 2019 Annual Report , Balance sheet (p.104) |
| 102-8 | Information on employees and other workers | 2019 ESG Supplement , ESG performance summary, Employees (p.72-77) Additional information: d. The majority of our workers are recognised employees of ANZ, rather than contractors. e. Across the Group in 2019, organisational changes resulted in a total of 1,395 roles being retrenched, which equates to 18% of total employee departures. |
| 102-9 | Supply chain | 2019 ESG Supplement , Respecting human rights (p.32-33) 2019 ESG Supplement , Managing ESG risks in our supply chain (p.34) |
| 102-10 | Significant changes to the organization and its supply chain | 2019 Annual Report , About our business (p.8) 2019 Annual Report , Our strategy (p.9) 2019 Annual Report , Directors' Report, Significant changes in state of affairs (p.99) |
| 102-11 | Precautionary Principle or approach | ANZ applies the precautionary principle in our approach to sustainability risks. Our Social and Environmental Risk Policy and Climate Change Statement are consistent with the precautionary principle. We are also a signatory to the United Nations Global Compact, in which principle 7 refers to the precautionary principle. |

| GRI Standard | Disclosure title | ANZ response |
|--|---|--|
| GRI 102: General Disclosures 2016 (cont.) | | |
| 102-12 | External initiatives | <p>CDP</p> <p>Dow Jones Sustainability Index</p> <p>Sustainable Development Goals</p> <p>OECD Guidelines for Multinational Enterprises</p> <p>United Nations Global Compact</p> <p>United Nations Principles for Responsible Banking</p> <p>Climate Disclosure Standards Board (CDSB) Statement</p> <p>Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)</p> <p>The Equator Principles</p> <p>London Benchmarking Group</p> <p>Financial Inclusion Action Plan (FIAP) program</p> <p>Reconciliation Australia</p> <p>UN Women's Empowerment Principles</p> <p>Workplace Gender Equality Agency (WGEA)</p> <p>Bloomberg Gender Equality Index</p> <p>FTSE4 Good Index</p> |
| 102-13 | Membership of associations | <p>2019 Annual Report, Public policy debate (p.30)</p> <p>Australian Banking Association</p> <p>Business Council of Australia</p> <p>New Zealand Bankers' Association</p> <p>Business New Zealand</p> <p>The Equator Principles and Equator Principles Working Group</p> <p>Transparency International</p> <p>Roundtable on Sustainable Palm Oil (RSPO) (Singapore)</p> <p>UN Environment Program Finance Initiative</p> <p>Carbon Markets Institute</p> |
| 102-14 | Statement from senior decision-maker | 2019 Annual Report , Chairman and CEO messages (p.4-7) |
| 102-15 | Key impacts, risks, and opportunities | <p>2019 Annual Report, 2019 performance snapshot (p.1)</p> <p>2019 Annual Report, What matters most (p.3)</p> <p>2019 Annual Report, Our strategy (p.9)</p> <p>2019 Annual Report, How we create value (p.10-11)</p> <p>2019 Annual Report, Our operating environment (p.14)</p> <p>2019 Annual Report, Becoming a fairer and more responsible bank (p.16)</p> <p>2019 Annual Report, Risk management (p.44-49)</p> <p>2019 ESG Supplement, ESG performance snapshot (p.2)</p> <p>2019 ESG Supplement, Governance and risk management (p.5)</p> <p>2019 ESG Supplement, What matters most (p.6-8)</p> <p>2019 ESG Supplement, ESG targets (p.12-13)</p> |
| 102-16 | Values, principles, standards, and norms of behaviour | <p>2019 Annual Report, About our business (p.8)</p> <p>2019 Annual Report, Our people (p.24-26)</p> <p>2019 ESG Supplement, Improving conduct and culture (p.14-15)</p> |
| 102-17 | Mechanisms for advice and concerns about ethics | 2019 ESG Supplement , Improving conduct and culture, Whistleblower policy (p.15) |
| 102-18 | Governance structure | <p>2019 Annual Report, Governance (p.32-42)</p> <p>2019 Corporate Governance Statement</p> <p>2019 ESG Supplement, Governance and risk management (p.5)</p> |

| GRI Standard | Disclosure title | ANZ response |
|--|---|---|
| GRI 102: General Disclosures 2016 (cont.) | | |
| 102-19 | Delegating authority | 2019 Annual Report , Governance (p.32-42) 2019 Corporate Governance Statement 2019 ESG Supplement , Governance and risk management (p.5) |
| 102-20 | Executive-level responsibility for economic, environmental, and social topics | 2019 ESG Supplement , Governance and risk management (p.5) |
| 102-21 | Consulting stakeholders on economic, environmental, and social topics | 2019 Annual Report, What matters most (p.3) 2019 Annual Report, Working with our stakeholders (p.12) 2019 ESG Supplement, What matters most (p.6-8) 2019 ESG Supplement, Stakeholder engagement (p.9-10) |
| 102-22 | Composition of the highest governance body and its committees | 2019 Annual Report , Governance (p.32-42) 2019 Corporate Governance Statement <i>Identified omission — Membership of under-represented social groups and stakeholder representation are not currently reported.</i> |
| 102-23 | Chair of the highest governance body | Chair of the ANZ Board is an independent non executive director. 2019 Corporate Governance Statement (p.3) |
| 102-24 | Nominating and selecting the highest governance body | 2019 Corporate Governance Statement (p.8) |
| 102-25 | Conflicts of interest | 2019 Corporate Governance Statement (p.10) |
| 102-26 | Role of highest governance body in setting purpose, values, and strategy | 2019 Annual Report , Governance (p.32-42) 2019 ESG Supplement , Governance and risk management (p.5) |
| 102-27 | Collective knowledge of highest governance body | 2019 Annual Report , Directors qualifications, experience and special responsibilities (p.38-42) 2019 Corporate Governance Statement , Board skills and experience (p.9) 2019 Corporate Governance Statement , Continuing education for Directors (p.12) |
| 102-28 | Evaluating the highest governance body's performance | 2019 Corporate Governance Statement , Performance evaluations (p.11) |
| 102-29 | Identifying and managing economic, environmental, and social impacts | 2019 Annual Report , What matters most (p.3) 2019 Annual Report , Working with our stakeholders (p.12) 2019 Annual Report , Our operating environment (p.14) 2019 Annual Report , Risk management (p.44-49) 2019 ESG Supplement , Governance and risk management (p.5) 2019 ESG Supplement , What matters most (p.6-8) 2019 ESG Supplement , Stakeholder engagement (p.9-10) |
| 102-30 | Effectiveness of risk management processes | 2019 Annual Report , What matters most (p.3) 2019 Annual Report , Governance (p.32-42) 2019 Annual Report , Risk management (p.44-49) 2019 ESG Supplement , Governance and risk management (p.5) 2019 ESG Supplement , What matters most (p.6-8) |
| 102-31 | Review of economic, environmental, and social topics | 2019 Annual Report , What matters most (p.3) 2019 Annual Report , Governance (p.32-42) 2019 Annual Report , Risk management (p.44-49) 2019 ESG Supplement , Governance and risk management (p.5) 2019 ESG Supplement , What matters most (p.6-8) |

GRI

| Standard | Disclosure title | ANZ response |
|--|--|--|
| GRI 102: General Disclosures 2016 (cont.) | | |
| 102-32 | Highest governance body's role in sustainability reporting | The Ethics, Environment, Social & Governance Committee (an ANZ Board Sub Committee) has final approval of the ESG reporting suite. |
| 102-33 | Communicating critical concerns | 2019 Annual Report , Governance (p.32-42) 2019 Annual Report , Risk management (p.44-49) 2019 ESG Supplement , Governance and risk management (p.5) 2019 Corporate Governance Statement , Commitment to shareholders (p.19) |
| 102-34 | Nature and total number of critical concerns | 2019 Annual Report , Governance (p.32-42) 2019 Annual Report , Risk management (p.44-49) 2019 ESG Supplement , Governance and risk management (p.5) 2019 Corporate Governance Statement , Commitment to shareholders (p.19) <i>Identified omission — The number of critical concerns communicated is subject to confidentiality constraints.</i> |
| 102-35 | Remuneration policies | 2019 Annual Report , Remuneration Report (p.66-100) |
| 102-36 | Process for determining remuneration | 2019 Annual Report , Remuneration Report (p.66-100) |
| 102-37 | Stakeholders' involvement in remuneration | An annual vote on our Remuneration Report is part of the AGM, the results of which are published on our website. In FY2018, the motion was carried as an ordinary resolution on a poll. The total number of votes exercisable by all validly appointed proxies was: <ul style="list-style-type: none"> • Votes where the proxy was directed to vote 'for' the motion 938,683,397 • Votes where the proxy was directed to vote 'against' the motion 488,585,690 • Votes where the proxy may exercise a discretion how to vote 19,982,282 |
| 102-38 | Annual total compensation ratio | <i>Identified omission — ANZ does not publicly report ratios based on individual compensation or make pay decisions based on these ratios. We consider this data confidential.</i> We provide detailed disclosures on remuneration in the 2019 Annual Report , Remuneration Report (p.66-100). |
| 102-39 | Percentage increase in annual total compensation ratio | <i>Identified omission — ANZ does not publicly report ratios based on individual compensation or make pay decisions based on these ratios. We consider this data confidential.</i> We provide detailed disclosures on remuneration in the 2019 Annual Report , Remuneration Report (p.66-100). |
| 102-40 | List of stakeholder groups | 2019 ESG Supplement , Stakeholder engagement (p.9-10) |
| 102-41 | Collective bargaining agreements | In Australia, approximately 92% of employees are covered by a collective bargaining agreement. In New Zealand, 44% of employees are covered by a collective agreement. |
| 102-42 | Identifying and selecting stakeholders | 2019 ESG Supplement , Stakeholder engagement (p.9-10) We have a formal engagement policy that applies to all ANZ employees and our engagement processes are designed to ensure that all our stakeholders have direct access to us. |
| 102-43 | Approach to stakeholder engagement | 2019 ESG Supplement , What matters most (p.6-8) 2019 ESG Supplement , Stakeholder engagement (p.9-10) |
| 102-44 | Key topics and concerns raised | 2019 ESG Supplement , Stakeholder engagement (p.9-10) |
| 102-45 | Entities included in the consolidated financial statements | 2019 Annual Report , Notes to the consolidated financial statements - 25. Controlled entities (p.182-183) 2019 Annual Report , Notes to the consolidated financial statements - 26. Investments in associates (p.184-185) |

| GRI Standard | Disclosure title | ANZ response |
|--|--|---|
| GRI 102: General Disclosures 2016 (cont.) | | |
| 102-46 | Defining report content and topic Boundaries | 2019 ESG Supplement , Our 2019 reporting suite (p.1) 2019 ESG Supplement , What matters most (p.6-8) |
| 102-47 | List of material topics | 2019 ESG Supplement , What matters most (p.6-8) |
| 102-48 | Restatements of information | In specific locations throughout the report as relevant |
| 102-49 | Changes in reporting | 2019 ESG Supplement , What matters most (p.6-8) |
| 102-50 | Reporting period | 2019 ESG Supplement , Our 2019 reporting suite (p.1) |
| 102-51 | Date of most recent report | 2018 Sustainability Review 2019 Half Year Sustainability Targets Update |
| 102-52 | Reporting cycle | Annual reporting cycle including a half year performance update against ESG targets |
| 102-53 | Contact point for questions regarding the report | 2019 ESG Supplement , Our 2019 reporting suite (p.1) |
| 102-54 | Claims of reporting in accordance with the GRI Standards | 2019 ESG Supplement , Our 2019 reporting suite (p.1) |
| 102-55 | GRI content index | ANZ ESG Reporting — GRI Content Index 2019 |
| 102-56 | External assurance | 2019 ESG Supplement , Our 2019 reporting suite (p.1) |

GRI 103: Management Approach 2016

| | | |
|-------|--|--|
| 103-1 | Explanation of the material topic and its Boundary | 2019 ESG Supplement , What matters most (p.6-8) In each section of the 2019 Annual Report , 2019 Climate-related Financial Disclosures or 2019 ESG Supplement relating to the material topic. |
| 103-2 | The management approach and its components | In each section of the 2019 Annual Report , 2019 Climate-related Financial Disclosures or 2019 ESG Supplement relating to the material topic. |
| 103-3 | Evaluation of the management approach | In each section of the 2019 Annual Report , 2019 Climate-related Financial Disclosures or 2019 ESG Supplement relating to the material topic. |

TOPIC SPECIFIC DISCLOSURES — ECONOMIC

| GRI Standard | Disclosure title | ANZ response |
|---|--|--|
| GRI 201: Economic Performance 2016 | | |
| 201-1 | Direct economic value generated and distributed | <p>Payments to government: 2019 ESG Supplement, Voluntary tax transparency (p.64-65, 81)</p> <p>Community investments: 2019 ESG Supplement, Community investment (p.60-63, 78)</p> <p>Revenues and operation costs: 2019 Annual Report, Financial Report - Income statement (p.102)</p> <p>Employee wages and benefits: 2019 Annual Report, Notes to the consolidated financial statements - 3. Operating expenses (p.114-115)</p> <p>Payments to providers of capital: 2019 Annual Report, Notes to the consolidated financial statements - 5. Dividends (p.118-119)</p> |
| 201-2 | Financial implications and other risks and opportunities due to climate change | <p>2019 Climate-related Financial Disclosures</p> <p>2019 Annual Report, Our approach to climate change (p.48-49)</p> <p>2019 ESG Supplement, Responsible business lending (p.35-36)</p> <p>2019 ESG Supplement, Supporting the transition to a net-zero carbon economy (p.37-39)</p> |
| 201-3 | Defined benefit plan obligations and other retirement plans | We provide detailed disclosures about our superannuation and post-employment benefit obligations in the 2019 Annual Report , Notes to the consolidated financial statements - 30. Superannuation and post employment benefit obligations (p.194-195) |
| 201-4 | Financial assistance received from government | No significant financial assistance has been received from government. |
| GRI 205: Anti-corruption 2016 | | |
| 205-1 | Operations assessed for risks related to corruption | <p>2019 Annual Report, Risk management (p.44-47)</p> <p>2019 ESG Supplement, Financial crime (p.30-31)</p> |
| 205-2 | Communication and training about anti-corruption policies and procedures | <p>2019 ESG Supplement, Improving conduct and culture (p.14-15)</p> <p>2019 ESG Supplement, Financial crime (p.30-31)</p> <p>2019 ESG Supplement, 2019 ESG performance summary - Employees (p.72)</p> <p>All ANZ employees and contractors are required to complete ANZ Essentials training courses which cover all areas of our Code of Conduct, including the prevention of fraud, bribery and corruption.</p> |
| 205-3 | Confirmed incidents of corruption and actions taken | Information related to other incidents of corruption is proprietary and legally privileged. |

TOPIC SPECIFIC DISCLOSURES — SOCIAL

| GRI Standard | Disclosure title | ANZ response |
|---------------------------------------|--|---|
| GRI 418: Customer Privacy 2016 | | |
| 418-1 | Substantiated complaints concerning breaches of customer privacy and losses of customer data | <p>2019 ESG Supplement, 2019 ESG performance summary - Privacy complaints (p.80)</p> <p><i>Identified omission - Information related to identified leaks, thefts, or losses of customer data is considered confidential.</i></p> |