# ANZ ESG REPORTING GRI CONTENT INDEX 2020

Our 2020 environment, social and governance (ESG) reporting is prepared in accordance with the Global Reporting Initiative (GRI) Standards: Comprehensive option.

This GRI Content Index focuses on disclosures relating to our most material issues and indicates the sections of our ESG Supplement, Annual Report, Climate-related Financial Disclosures and 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, our materiality assessment had an emphasis on the 'social' aspects of ESG, and specifically our support for customers, employees and the community in response to COVID-19. The key steps in our 2020 materiality process, as well as the full list of our material issues, are discussed in detail in our ESG Supplement.

In 2020, 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)
Financial wellbeing	Promoting and enabling access to safe and affordable products and services, particularly for lower-income and vulnerable consumers. Work with cross-sector partners to help customers, employees and the broader community meet current financial commitments and needs, and improve their financial resilience.	We report on ANZ- specific indicators. Refer to pages 52-56 of our ESG Supplement.	External (customer) Internal (employees)
Customer experience	Delivering value and improved customer experience through appropriate financial products and services for all customers, small business and retail.	We report on ANZ - specific indicators. Refer to pages 17-24 of our ESG Supplement.	External (customers)
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)
Climate change	Managing the business risks and opportunities associated with climate change. Includes the role we play in supporting our customers to transition to a low-carbon economy.	201: Economic performance 2016 (201-2)	External (customers, communities, suppliers) Internal (employees)

Disclosures in our **2020 ESG Supplement** on material issues rated as 'lower priority' by our stakeholders have also been developed with consideration of the applicable GRI Standards however are not included in this content index. These include issues such as corporate governance, anti-money laundering and terrorism financing, responsible business lending, diverse and inclusive workforce and investing in the community.



2020 ANNUAL REPORT



2020 ESG SUPPLEMENT



2020 CLIMATE-RELATED FINANCIAL DISCLOSURES



2020 CORPORATE
GOVERNANCE STATEMENT



## **GENERAL DISCLOSURES**

GRI Standard	Disclosure title	ANZ response
GRI 102: G	eneral Disclosures 2016	
102-1	Name of the organization	Australia and New Zealand Banking Group
102–2	Activities, brands, products, and services	<ul><li>2020 Annual Report, About our business (p.10)</li><li>2020 Annual Report, Our strategy (p.11)</li><li>2020 Annual Report, How we create value (p.12-13)</li></ul>
102-3	Location of headquarters	833 Collins Street, Docklands, Victoria, Australia
102-4	Location of operations	2020 Annual Report, Our international presence and earning composition by geography (p.241)
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	<ul><li>2020 Annual Report, Our international presence and earning composition by geography (p.241)</li><li>2020 Annual Report, About our business (p.10)</li><li>2020 Annual Report, Our divisions (p.25-27)</li></ul>
102–7	Scale of the organization	<ul> <li>2020 Annual Report, Our international presence and earning composition by geography (p.241)</li> <li>2020 Annual Report, About our business (p.10)</li> <li>2020 Annual Report, Our strategy (p.11)</li> <li>2020 Annual Report, Our divisions (p.25-27)</li> <li>2020 Annual Report, Performance overview (p.54-72)</li> <li>2020 Annual Report, Income statement (p.112)</li> <li>2020 Annual Report, Balance sheet (p.114)</li> </ul>
102-8	Information on employees and other workers	<ul> <li>2020 ESG Supplement, ESG performance summary, Employees (p.89-95)</li> <li>Additional information:</li> <li>d. The majority of our workers are recognised employees of ANZ, rather than contractors.</li> <li>e. Across the Group in 2020, organisational changes resulted in a total of 766 roles being retrenched, which equates to 18% of total employee departures.</li> </ul>
102–9	Supply chain	<ul><li>2020 ESG Supplement, Our approach to human rights (p.32-34)</li><li>2020 ESG Supplement, Managing ESG risks and opportunities in our supply chain (p.35-36)</li></ul>
102–10	Significant changes to the organization and its supply chain	<ul><li>2020 Annual Report, About our business (p.10)</li><li>2020 Annual Report, Our strategy (p.11)</li><li>2020 Annual Report, Directors' Report, Significant changes in state of affairs (p.109)</li></ul>
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: G	GRI 102: General Disclosures 2016 (cont.)		
102–12	External initiatives	CDP Dow Jones Sustainability Index Sustainable Development Goals OECD Guidelines for Multinational Enterprises United Nations Global Compact United Nations Princibles for Responsible Banking Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD) The Equator Principles London Benchmarking Group Financial Inclusion Action Plan (FIAP) program Reconciliation Australia UN Women's Empowerment Principles Workplace Gender Equality Agency (WGEA) FTSE4 Good Index  Note: This list is not exhaustive.	
102–13	Membership of associations	2020 Annual Report, Public policy debate (p.33)  Australian Banking Association Business Council of Australia New Zealand Bankers' Association Business New Zealand The Equator Principles and Equator Principles Working Group Transparency International Roundtable on Sustainable Palm Oil (RSPO) (Singapore) UN Environment Program Finance Initiative Carbon Markets Institute  Note: This list is not exhaustive.	
102–14	Statement from senior decision-maker	2020 Annual Report, Chairman and CEO messages (p.4-7)	
102–15	Key impacts, risks, and opportunities	2020 Annual Report, 2020 performance snapshot (p.1) 2020 Annual Report, What matters most (p.3) 2020 Annual Report, Our strategy (p.11) 2020 Annual Report, How we create value (p.12-13) 2020 Annual Report, Our operating environment (p.14) 2020 Annual Report, Becoming a fairer and more responsible bank (p.16-17) 2020 Annual Report, Risk management (p.49-53) 2020 ESG Supplement, ESG performance snapshot (p.2) 2020 ESG Supplement, ESG Governance and risk management (p.5) 2020 ESG Supplement, What matters most (p.6-8) 2020 ESG Supplement, Our ESG targets (p.11-12)	
102–16	Values, principles, standards, and norms of behaviour	<ul><li>2020 Annual Report, About our business (p.10)</li><li>2020 Annual Report, Our people (p.28-30)</li><li>2020 ESG Supplement, Improving conduct and culture (p.13-14)</li></ul>	
102–17	Mechanisms for advice and concerns about ethics	2020 ESG Supplement, Improving conduct and culture, Whistleblower policy (p.14)	
102–18	Governance structure	<ul><li>2020 Annual Report, Governance (p.38-48)</li><li>2020 Corporate Governance Statement</li><li>2020 ESG Supplement, ESG Governance and risk management (p.5)</li></ul>	



GRI Standard	Disclosure title	ANZ response
GRI 102: G	eneral Disclosures 2016 (cont.)	
102–19	Delegating authority	2020 Annual Report, Governance (p.38-48)
		2020 Corporate Governance Statement
		<b>2020 ESG Supplement</b> , ESG Governance and risk management (p.5)
102–20	Executive-level responsibility for economic, environmental, and social topics	2020 ESG Supplement, ESG Governance and risk management (p.5)
102-21	Consulting stakeholders on	2020 Annual Report, What matters most (p.3)
	economic, environmental,	2020 ESG Supplement, What matters most (p.6-8) 2020
	and social topics	ESG Supplement, Stakeholder engagement (p.9-10)
102–22	Composition of the highest	2020 Annual Report, Governance (p.38-48)
102 22	governance body and its	2020 Corporate Governance Statement
	committees	Identified omission — Membership of under-represented social groups and
		stakeholder representation are not currently reported.
102-23	Chair of the highest	Chair of the ANZ Board is an independent non executive director.
	governance body	2020 Corporate Governance Statement (p.6)
102–24	Nominating and selecting the highest governance body	2020 Corporate Governance Statement (p.8)
102-25	Conflicts of interest	2020 Corporate Governance Statement (p.10)
102–26	Role of highest governance	2020 Annual Report, Governance (p.38-48)
	body in setting purpose, values, and strategy	2020 ESG Supplement, ESG Governance and risk management (p.5)
102-27	Collective knowledge of	2020 Annual Report, Directors qualifications, experience and special responsibilities (p.44-48)
	highest governance body	2020 Corporate Governance Statement, Board skills and experience (p.9)
		<b>2020 Corporate Governance Statement</b> , Continuing education for Directors (p.12)
102–28	Evaluating the highest governance body's performance	2020 Corporate Governance Statement, Performance evaluations (p.11)
102-29	Identifying and managing	2020 Annual Report, What matters most (p.3)
	economic, environmental,	2020 Annual Report, Our operating environment (p.14)
	and social impacts	2020 Annual Report, Risk management (p.49-53)
		2020 ESG Supplement, ESG Governance and risk management (p.5)
		2020 ESG Supplement, What matters most (p.6-8)
		2020ESG Supplement, Stakeholder engagement (p.9-10)
102-30	Effectiveness of risk	2020 Annual Report, What matters most (p.3)
	management processes	2020 Annual Report, Governance (p.38-48)
		2020 Annual Report, Risk management (p.49-53)
		2020 ESG Supplement, ESG Governance and risk management (p.5)
		2020 ESG Supplement, What matters most (p.6-8)
102-31	Review of economic,	2020 Annual Report, What matters most (p.3)
	environmental, and	2020 Annual Report, Governance (p.38-48)
	social topics	2020 Annual Report, Risk management (p.49-53)
		2020 ESG Supplement, ESG Governance and risk management (p.5)
		2020 ESG Supplement, What matters most (p.6-8)



GRI Standard	Disclosure title	ANZ response
GRI 102: G	eneral 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	<ul> <li>2020 Annual Report, Governance (p.38-48)</li> <li>2020 Annual Report, Risk management (p.49-53)</li> <li>2020 ESG Supplement, ESG Governance and risk management (p.5)</li> <li>2020 Corporate Governance Statement, Commitment to shareholders (p.19)</li> </ul>
102–34	Nature and total number of critical concerns	<ul> <li>2020 Annual Report, Governance (p.38-48)</li> <li>2020 Annual Report, Risk management (p.49-53)</li> <li>2020 ESG Supplement, ESG Governance and risk management (p.5)</li> <li>2020 Corporate Governance Statement, Commitment to shareholders (p.19)</li> <li>Identified omission — The number of critical concerns communicated is subject to confidentiality constraints.</li> </ul>
102-35	Remuneration policies	2020 Annual Report, Remuneration Report (p.75-108)
102–36	Process for determining remuneration	2020 Annual Report, Remuneration Report (p.75-108)
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 FY2019, the motion was carried as an ordinary resolution on a poll. The total number of votes exercisable by all validly appointed proxies was:  Votes where the proxy was directed to vote 'for' the motion 1,253,079,867  Votes where the proxy was directed to vote 'against' the motion 142,185,012  Votes where the proxy may exercise a discretion how to vote 18,887,023
102–38	Annual total compensation ratio	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.  We provide detailed disclosures on remuneration in the 2020 Annual Report, Remuneration Report (p.75-108).
102–39	Percentage increase in annual total compensation ratio	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.  We provide detailed disclosures on remuneration in the 2020 Annual Report, Remuneration Report (p.75-108).
102-40	List of stakeholder groups	2020 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, 42% of employees are covered by a collective agreement.
102–42	Identifying and selecting stakeholders	<b>2020 ESG Supplement</b> , 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	2020 ESG Supplement, What matters most (p.6-8) 2020 ESG Supplement, Stakeholder engagement (p.9-10)
102-44	Key topics and concerns raised	2020 ESG Supplement, Stakeholder engagement (p.9-10)
102–45	Entities included in the consolidated financial statements	<ul> <li>2020 Annual Report, Notes to the consolidated financial statements - 25. Controlled entities (p.201-202)</li> <li>2020 Annual Report, Notes to the consolidated financial statements - 26. Investments in associates (p.203-204)</li> </ul>



GRI Standard	Disclosure title	ANZ response
GRI 102: G	eneral Disclosures 2016 (cont.)	
102–46	Defining report content and topic Boundaries	2020 ESG Supplement, Our 2020 reporting suite (p.1) 2020 ESG Supplement, What matters most (p.6-8)
102–47	List of material topics	2020 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	2020 ESG Supplement, What matters most (p.6-8)
102-50	Reporting period	2020 ESG Supplement, Our 2020 reporting suite (p.1)
102–51	Date of most recent report	2019 ESG Supplement 2020 Half Year ESG Target 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	2020 ESG Supplement, Our 2020 reporting suite (p.1)
102–54	Claims of reporting in accordance with the GRI Standards	2020 ESG Supplement, Our 2020 reporting suite (p.1)
102-55	GRI content index	ANZ ESG Reporting — GRI Content Index 2020
102–56	External assurance	2020 ESG Supplement, Our 2020 reporting suite (p.1)

## GRI 103: Management Approach 2016

103–1	Explanation of the material topic and its Boundary	2020 ESG Supplement, What matters most (p.6-8) In each section of the 2020 Annual Report, 2020 Climate-related Financial Disclosures or 2020 ESG Supplement relating to the material topic.
103–2	The management approach and its components	In each section of the 2020 Annual Report, 2020 Climate-related Financial Disclosures or 2020 ESG Supplement relating to the material topic.
103–3	Evaluation of the management approach	In each section of the <b>2020 Annual Report, 2020 Climate-related Financial Disclosures</b> or <b>2020 ESG Supplement</b> relating to the material topic.



## TOPIC SPECIFIC DISCLOSURES — ECONOMIC

GRI Standard	Disclosure title	ANZ response
GRI 201: Ec	onomic Performance 2016	
201–1	Direct economic value generated and distributed	Payments to government: 2020 ESG Supplement, Voluntary tax transparency (p.70-71, 99) Community investments: 2020 ESG Supplement, Community investment (p.65-69, 96) Revenues and operation costs: 2020 Annual Report, Financial Report - Income statement (p.112) Employee wages and benefits: 2020 Annual Report, Notes to the consolidated financial statements - 3. Operating expenses (p.126-127) Payments to providers of capital: 2020 Annual Report, Notes to the consolidated financial statements - 5. Dividends (p.130-131)
201–2	Financial implications and other risks and opportunities due to climate change	<ul> <li>2020 Climate-related Financial Disclosures</li> <li>2020 Annual Report, Our approach to climate change (p.34-35)</li> <li>2020 ESG Supplement, Responsible business lending (p.37-39)</li> <li>2020 ESG Supplement, Reviewing our approach to climate change (p.40-41)</li> <li>2020 ESG Supplement, Supporting the transition to a net-zero carbon economy (p.42-45)</li> </ul>
201–3	Defined benefit plan obligations and other retirement plans	We provide detailed disclosures about our superannuation and post-employment benefit obligations in the <b>2020 Annual Report</b> , Notes to the consolidated financial statements - 30. Superannuation and post employment benefit obligations (p.212-213)
201–4	Financial assistance received from government	No significant financial assistance has been received from government.
GRI 205: Ar	nti-corruption 2016	
205–1	Operations assessed for risks related to corruption	2020 Annual Report, Risk management (p.49-53) 2020 ESG Supplement, Financial crime (p.30-31)
205–2	Communication and training about anti-corruption policies and procedures	<ul> <li>2020 ESG Supplement, Improving conduct and culture (p.13-14)</li> <li>2020 ESG Supplement, Financial crime (p.30-31)</li> <li>2020 ESG Supplement, 2020 ESG performance summary - Employees (p.94)</li> <li>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.</li> </ul>
205–3	Confirmed incidents of corruption and actions taken	Identified omission — Information related to other incidents of corruption is proprietary and legally privileged.

## TOPIC SPECIFIC DISCLOSURES — SOCIAL

GRI Standard GRI 418: Cu	Disclosure title ustomer Privacy 2016	ANZ response
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	2020 ESG Supplement, Cyber security, data protection and privacy, Data governance at ANZ (p.29) 2020 ESG Supplement, 2020 ESG performance summary - Privacy complaints (p.80)

