

2025 Modern Slavery and Human Trafficking Statement

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We are continually seeking to improve our reporting suite and welcome feedback on our modern slavery and human trafficking reporting. Please address any questions, comments or suggestions to esg@anz.com

Acknowledgement of Country and Traditional Owners

ANZ acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to lands, skies and waterways. We pay our respects to Aboriginal and Torres Strait Islander cultures, and to Elders past and present.

Whakatauākī, ANZ New Zealand's Proverb

Tākiri-ā-Rangī The expansive universe above

Tākiri-ā-Nuku The beauty of the proceeding lands below

Tākiri te Awatea A new dawn beckons

Kia Puāwai ki te Ao A blossoming to the world

Te Kare ā-Roto e With ripples of compassion and hope for all.



CEO's message

Nuno Matos
Chief Executive Officer

At ANZ, we respect human rights, including the rights of our employees, customers and communities.

We expect the same respect for human rights from everyone who works for, or with, us. We recognise the importance of the role we play in identifying, assessing and managing modern slavery risks in our operations and supply chain.

Our modern slavery work program remains focused on three key areas: building awareness through training and education, policy and process improvements, and enhancing due diligence on our suppliers and customers.

Our people, particularly those who are more likely to encounter modern slavery risks in their roles, are provided with opportunities to build their capabilities in identifying modern slavery risks and escalating as appropriate. For example, sourcing employees in our Group Procurement team complete specialised training on modern slavery risks in the supply chain.

Deepening our understanding of our customers helps us to better respond to their needs. Through engagement and due diligence, we seek to improve our understanding of their modern slavery risks and how they are being managed. Identifying higher risk sectors or where individuals may be more vulnerable enables us to be more targeted with our work and focused on where we can have the most impact.

We continue to engage with a broad range of stakeholders including through consultations on changes to the Modern Slavery Act in Australia and on proposed legislation in New Zealand.

Strengthening non-financial risk management is a strategic imperative for ANZ, to protect customers, enable resilient operations and sustain trust in the bank's integrity. We remain focused on implementing sustained improvements to our non-financial risk management and risk culture, including improving policies and processes to identify, assess and manage modern slavery risks.

Approval and sign off

The 2025 Modern Slavery and Human Trafficking Statement (Statement) was approved by the Boards of ANZ Group Holdings Limited, ANZ BH Pty Ltd, and Australia and New Zealand Banking Group Limited on 26 March 2026. ANZ Group Holdings Limited is a 'higher entity' within the meaning of section 14(2)(d)(ii) of the Australian Commonwealth *Modern Slavery Act 2018* (Cth) being the entity in a position to influence or control each other reporting entity covered by this Statement.

This Statement is signed by Nuno Matos in his roles as Chief Executive Officer, Executive Director of ANZ Group Holdings Limited, ANZ BH Pty Ltd and Australia and New Zealand Banking Group Limited.

Nuno Matos
Chief Executive Officer

26 March 2026

About this Statement

This document is ANZ Group Holdings Limited (ANZGHL) ABN 16 659 510 791 and its subsidiaries' response to the requirements of both the Australian Commonwealth *Modern Slavery Act 2018* (Cth) (Australian Act) and the United Kingdom *Modern Slavery Act 2015* (UK Act). This document is referred to throughout as the "Statement". Appendix 1 on page 29 outlines the reporting criteria under the Australian Act and UK Act respectively and identifies where each criterion is addressed in this Statement.

In this Statement, we refer to "modern slavery" which means conduct that would constitute trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

ANZ takes a Group-wide approach to managing modern slavery risks in our operations and supply chain. This is a joint Statement made by ANZ on behalf of itself and the reporting entities listed on the following page. This is our tenth UK Statement and sixth Australian Statement.

Reading this Statement

Words underlined like 'this' are explained in the glossary of terms on pages 30-31.

In this Statement the use of the words "ANZ" or "the Group" or "our" or "we" or "us" refers to ANZGHL and its subsidiaries (excluding Suncorp Bank) including any entities that the reporting entities control and entities in which the reporting entities have an ownership interest exceeding 50%, unless otherwise stated.

Monetary amounts in this document are reported in Australian dollars (AUD), unless otherwise stated. Throughout this Statement, the sum of parts within charts and commentary may not equal totals due to rounding.

Reporting boundaries and periods

This Statement covers the actions we have taken to identify, assess and manage modern slavery and human trafficking risks in our operations and supply chain during the financial year commencing 1 October 2024 and ending 30 September 2025, referred to as "2025" throughout the Statement.

Suncorp Bank

On 31 July 2024, the Group acquired 100% of the shares in SBGH Limited, the immediate holding company of Norfina Limited (ABN 66 010 831 722) (previously called Suncorp-Metway Limited) ("Suncorp Bank").

Following the acquisition, Suncorp Bank commenced a phased transition to adopt the policies and processes of ANZ. During the transition period, Suncorp Bank will be subject to a combination of ANZ and Suncorp Bank policies. As part of the ongoing transition, Suncorp Bank will seek to align to ANZ policies and practices, where appropriate. Where Suncorp Bank is included or excluded in programs, policies, standards or metrics throughout the Statement, this is denoted.

Suncorp Bank's operations continue to be supervised by regulatory bodies, and it seeks to meet all due diligence obligations mandated by law.

The following ANZ policies, which embed our approach to managing modern slavery risks, currently apply to Suncorp Bank:

- Anti-Bribery and Anti-Corruption Business Integrity Policy
- Anti-Bribery and Anti-Corruption Third-Party Due Diligence Standard
- Anti-Fraud Policy and Standard
- Code of Conduct
- Diversity and Inclusion Policy
- Equal Opportunity, Bullying and Harassment Policy
- Recruitment Policy
- Changing Locations Policy
- Non-Financial Risk Policy
- Procurement Policy
- Supplier Code of Practice
- Wellbeing and Safety Policy
- Whistleblower Policy

During the reporting year, Suncorp Bank retained the following policies:

- Complaints Management Policy
- Anti-Money Laundering, Counter-Terrorism Financing and Sanctions Policy
- Competition Policy
- Credit Risk Policy
- Responsible Banking Policy
- Operational Resilience Policy

Consultation process with Group entities

The consultation process described in this section distinguishes between consultation undertaken with the 13 reporting entities covered by this Statement (see table on the following page) and consultation undertaken with other entities owned or controlled by a reporting entity.

The reporting entities listed on the following page apply relevant ANZ policies and practices¹ described in this Statement in managing modern slavery risks. Each reporting entity considers modern slavery risks that may be unique to their business and, where considered appropriate, seeks input from members of the Group's Modern Slavery Working Group, as discussed on page 14.

Our Group Environmental, Social and Governance (ESG) team consulted with representatives of each reporting entity during the reporting period. The consultation involved:

- Engagement with each reporting entity included in ANZ's 2024 Modern Slavery and Human Trafficking Statement to understand:
 - Whether they expect to be a reporting entity in the current financial year;
 - Whether there have been, or are likely to be, any changes to business processes that may impact their modern slavery risk profile – for example, onboarding new suppliers or customers in a manner different from relevant ANZ policies and processes; and
 - If there are any new business activities that they have, or intend to, engage in that may impact their modern slavery risk profile.

¹. As detailed in the Suncorp Bank section above, Suncorp Bank reporting entities apply a combination of ANZ and Suncorp Bank policies.

- Asking each reporting entity to confirm that it understands its applicable legal obligations under the Australian Act and/or the UK Act.
- Engagement with each reporting entity after the end of ANZ's financial year (30 September) as part of the preparation of this Statement, confirming our intention to include the reporting entity in our joint Statement and providing an opportunity to review the Statement prior to approval.

We also consulted with non-reporting entities that the Group owns or controls (excluding dormant entities).² This consultation occurs annually and involves providing each entity with a copy of the Group's Statement from

the prior financial year along with a summary of the Group's modern slavery risks and how they are being managed. The consultation involved requesting each entity to confirm that it has considered its potential modern slavery risks and that it is not exposed to modern slavery risks other than those described in the Group Statement. It provides an opportunity for further dialogue and, where appropriate, to participate in the preparation of this Statement.

We may also provide support to other entities we have a relationship with, but are not owned or controlled by ANZ, including the ANZ Australian Staff Superannuation Scheme (Scheme).³

Assurance

KPMG has performed limited assurance with respect to ANZ's 2025 Modern Slavery and Human Trafficking Statement, in accordance with the Australian Commonwealth *Modern Slavery Act 2018* (Cth) (Australian Act) and the United Kingdom *Modern Slavery Act 2015* (UK Act). KPMG's Independent Limited Assurance Report is on pages 32-33.

ANZGHL reporting entities

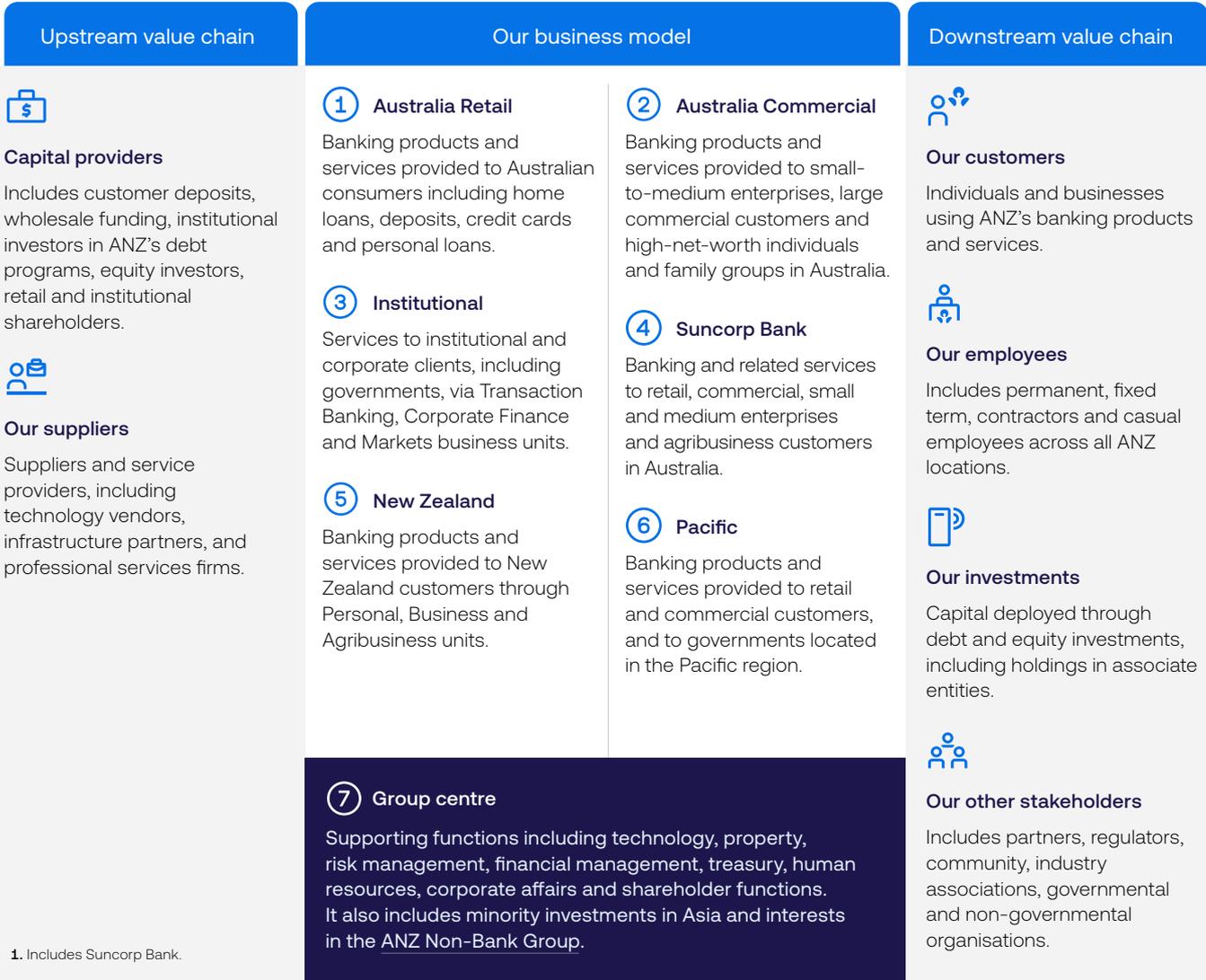
Australian Act	UK Act	Entity name	Australian Business Number (ABN)
		ANZ Group Holdings Limited	16 659 510 791
		ANZ BH Pty Ltd	45 658 939 952
		Australia and New Zealand Banking Group Limited	11 005 357 522
		ANZ Funds Pty Ltd	61 004 594 343
		ANZ Global Services and Operations Pty Limited	49 142 405 632
		ANZ Lenders Mortgage Insurance Pty Limited	77 008 680 055
		ANZ Residential Covered Bond Trust	73 378 956 428
		APOLLO Series 2008-1R Trust	85 488 683 230
		Kingfisher Trust 2008-1	83 026 578 533
		Norfina Covered Bond Trust	14 274 852 576
		Norfina Limited	66 010 831 722
		SBGH Limited	83 145 980 838
		Votrait No. 1103 Pty Limited	98 082 564 369

² Dormant entities were excluded from the engagement process. ANZ defines 'dormant entity' as an entity that is no longer operating but is still registered. A list of ANZ Group Holdings Limited's controlled entities as at 30 September 2025 can be found on page 213 of ANZ's 2025 Annual Report available at anz.com/annualreport. ³ ANZ owns the trustee company that owns the Scheme. The Scheme itself is not owned by ANZ. We engage with ANZ employees who administer the Scheme, sharing information and resources to support their approach to modern slavery.

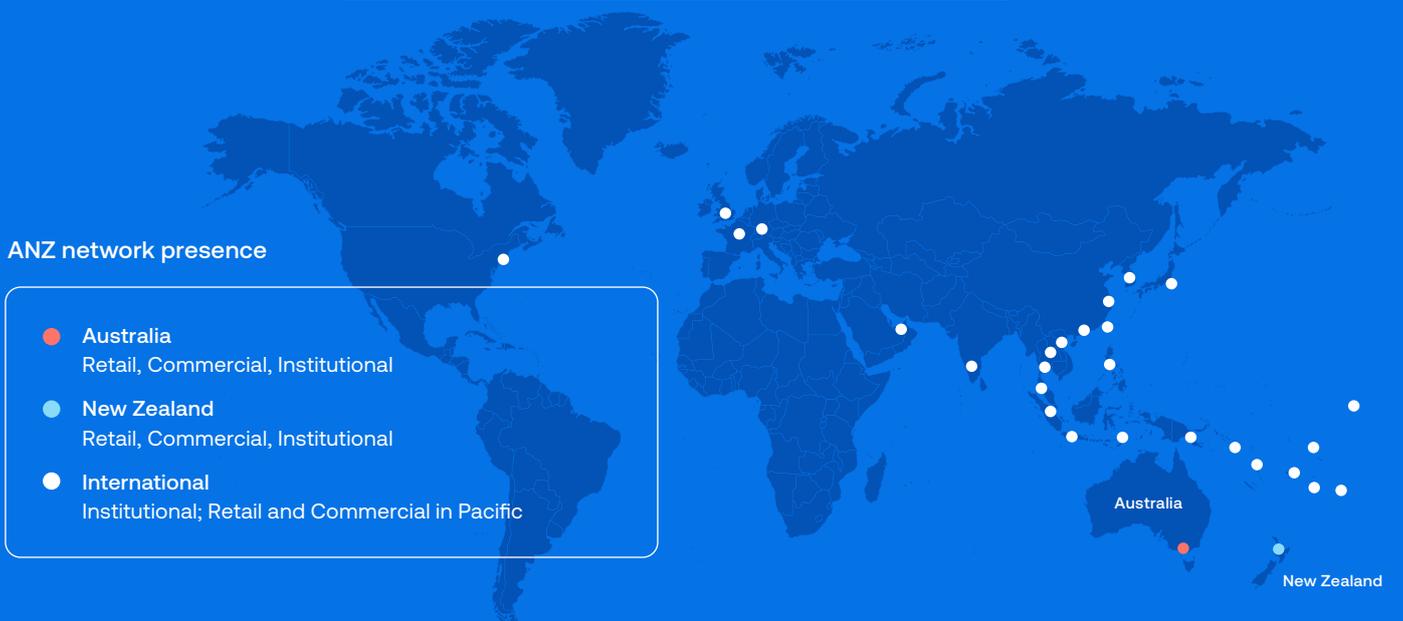
About our business

Our structure and operations

ANZ provides banking and financial products and services to more than 11 million customers¹ across 29 markets. ANZ is supported by a broad ecosystem of stakeholders integrated across our value chain to deliver banking products and financial services. These include capital providers, suppliers, employees and customers.



¹ Includes Suncorp Bank.



Governance structure

Board oversight

The ANZGHL Board (Board) is responsible for oversight of the Group. The Board, with the support of its committees, is also responsible for overseeing ANZ’s governance framework. The framework seeks to provide effective and responsible decision making, assisting ANZ in delivering on its strategy and purpose.



The Board and each Board Committee has its own charter setting out its roles and responsibilities available at anz.com/corporategovernance

More information on ANZ’s governance framework is provided in the 2025 Corporate Governance Statement available at anz.com/corporategovernance

The Board oversees our ESG approach, including how we manage our human rights and modern slavery risks and is responsible for the oversight and approval of the Statement.

ANZ has a delegations of authority framework that outlines matters delegated to the CEO and other members of senior management.

Executive oversight

The Executive Committee (ExCo²) comprises ANZ’s most senior executives. The Group Head Corporate Affairs has overall responsibility for ANZ’s modern slavery program of work. Group ESG Analytics and Advisory lead the Group Modern Slavery Working Group and are responsible for keeping ExCo (previously the Ethics and Responsible Business Committee (ERBC)) informed of the program of work and, where necessary, escalating issues for executive oversight.

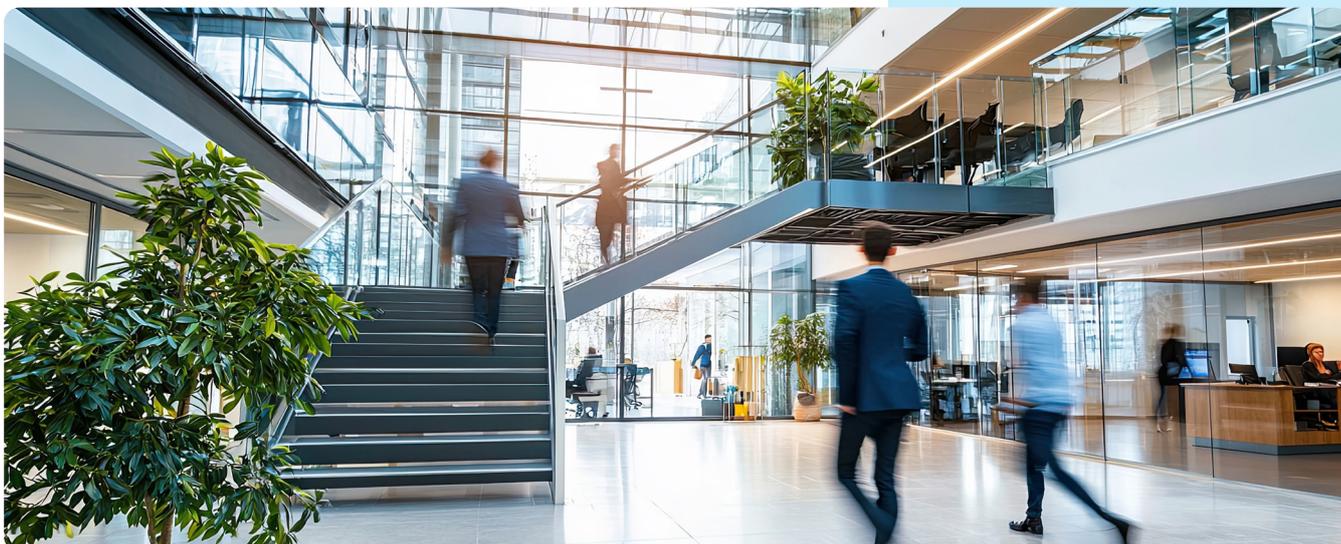


For more information on the Modern Slavery Working Group see page 14

The proposed 2025 modern slavery program of work referred to throughout this Statement was reviewed by the ERBC and Board.

Our Group ESG Governance Framework is evolving with our ESG approach and the expectations of our stakeholders. In 2025, and with a view to further integrating ESG into the business, the following changes have occurred relating to committees that had oversight of our ESG approach:

- The Board Ethics, Environment, Social and Governance (EESG) Committee was discontinued and its responsibilities reallocated, as appropriate, to the Board.
- The management ERBC was discontinued and, where appropriate, matters including human rights and modern slavery are referred to ExCo.



2. The members of ExCo are available at anz.com/exco.

Policies and standards

ANZ respects human rights, including the rights of our employees, customers and the community. We expect the same respect for human rights from everyone who works for or with us.

Our approach to human rights is outlined in our Human Rights Statement, which was updated in June 2025. Our approach to human rights is guided by our Code of Conduct, our behaviours and our values, and is informed by internationally recognised human rights

frameworks and standards. These include the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights (UNGPs).

The policies, processes and standards that embed our approach to human rights are listed below. We continue to review our policies via our periodic policy review process.

Policies and standards	Purpose, application and implementation
Accessibility and Inclusion Plan	Includes 14 commitments designed to embed accessibility and inclusion into key aspects of our business in Australia and New Zealand. Available at anz.com/accessible-workplace .
Anti-Bribery and Anti-Corruption Business Integrity Policy (ABAC Policy)	Outlines the key principles and intent behind our ABAC Policy, demonstrating ANZ's commitment to transparency, fairness and ethical business conduct. Available at anz.com/corporategovernance .
Anti-Bribery and Anti-Corruption Third-Party Due Diligence Standard	Provides guidance on how to achieve consistent and demonstrable compliance before entering or continuing business relationships with third parties. <i>Internal standard.</i>
Anti-Fraud Policy and Standard	Sets the minimum requirements for the prevention, detection, investigation and reporting of fraud and scams. Available at anz.com/corporategovernance .
Anti-Money Laundering and Counter-Terrorism Financing Policy Summary	Summarises our approach to detecting and deterring money laundering and terrorism financing. Available at anz.com/corporategovernance .
Changing Locations Policy	Serves as the governing framework for all international employee relocations and international foreign hires. It is supported by a subset of policies that define specific benefits and standards, ensuring consistency and compliance across all moves. <i>Internal policy.</i>
Climate Change Commitment	Outlines ANZ's commitment to transitioning our lending portfolio to net zero financed emissions, reflecting where we can have the most significant impact. Available at anz.com.au/about-us/esg/environmental-sustainability/climate-change .
Code of Conduct	Outlines our expected standards of behaviour and helps us to make fair, balanced and ethical decisions in our day-to-day work. Available at anz.com/corporategovernance .
Complaints Handling Policy and Complaint Guide	<p>The policy outlines how ANZ identifies, records, manages and resolves complaints in a consistent way that delivers fair, transparent and efficient outcomes. <i>Internal policy.</i></p> <p>The guide explains how customers can make a complaint, what they can expect from us and how long the process will take. It also provides clear instructions on how to contact the Australian Financial Complaints Authority and the New Zealand Banking Ombudsman Scheme if they are not satisfied with our response. Available at anz.com/complaints and anz.co.nz/complaints.</p>



Policies and standards

Purpose, application and implementation

Diversity and Inclusion Policy	Outlines how we demonstrate and report on our commitment to diversity and inclusion within the workforce and workplace. Available at anz.com/corporategovernance .
Equal Opportunity, Bullying and Harassment Policy	Sets out the conduct standards required of ANZ employees and contractors, and how to identify, report and help prevent unacceptable behavior at ANZ. Summary available at anz.com/corporategovernance .
Human Rights Statement	Outlines our approach to respecting human rights and is informed by the UNGPs. Available at anz.com/human-rights .
Procurement Policy	Outlines our fair, responsible, and ethical approach to procuring and paying for goods and services including the requirements for evaluating, onboarding, managing and terminating suppliers. <i>Internal policy.</i>
Recruitment Policy	Outlines our recruitment protocols, including how we source talent, how we ensure equitable selection decisions, and considerations for internal candidates. <i>Internal policy.</i>
Social and Environmental Risk Policy and Standard	Outlines ANZ Bank Group's approach to the management and mitigation of social and environmental risks arising from large business customer activities. Information about the policy and standard is available at anz.com/social-and-environmental-risk-management .
Supplier Code of Practice	Outlines our minimum expectations for suppliers in relation to human rights, workplace relations, workplace health and safety, ethical business practices, information management and confidentiality, accessibility, environmental management and supplier diversity. Available at anz.com/sustainable-procurement .
Third-Party Risk Management Policy and Standard	Provides the requirements for identification, assessment, management and reporting of risks related to the use of third parties across the end-to-end lifecycle of a third-party engagement. <i>Internal policy and standard.</i>
Wellbeing and Safety Policy	Details ANZ's commitment to eliminating or minimising wellbeing and safety risks from our activities and highlights the importance of our employee wellbeing programs. Summary available at anz.com.au/about-us/esg/workplace-participation-diversity/employee-engagement .
Whistleblower Policy	Outlines how eligible individuals can report misconduct concerns through the whistleblower channel related to the ANZ Group, the protections that will apply and how the concerns will be investigated. Available at anz.com/corporategovernance .

Channels to raise concerns

We have multiple channels available to raise concerns, including about modern slavery. The following are examples of channels available to our employees:

- People leaders
- Group ESG Analytics and Advisory
- Group Procurement
- Group Integrity
- Group Compliance
- Whistleblower channel
- Suspicious and Unusual Activity Reports¹



There are also channels available for external stakeholders to raise concerns, such as our customer complaints channels, and our whistleblower channel and our Human Rights Grievance Mechanism, as outlined on the following page

We support a speak up culture and encourage all of our people to take responsibility for managing risks. We are committed to further strengthening our speak up culture which has been integrated into our broader planning and approach to non-financial risk management.

My Voice is ANZ’s enterprise-wide engagement survey that captures employee sentiment across engagement, wellbeing, inclusion, speak up culture and leadership.

In 2025, specific questions were included in the My Voice surveys relating to expressing ideas, asking questions, and raising problems or concerns without fear of reprisals or negative consequences. Data from our August 2025 survey² showed that 80%³ of employees (81%⁴ in August 2024) feel confident to speak up at ANZ.

New Zealand modern slavery escalation process

During the year, a New Zealand specific modern slavery escalation process was developed to complement the existing Group process. The escalation process provides clear pathways for ANZ Bank New Zealand Limited (ANZ Bank New Zealand) employees to report modern slavery-related concerns to the ESG Centre of Excellence team.

Concerns raised through the escalation process are acknowledged and assessed for investigation by the appropriate teams, prioritising actions that seek to protect individuals or mitigate harm. The process provides for a range of outcomes that may include advice on a course of action, account reviews, escalation to external authorities or referral to support services. Insights from cases are expected to inform continuous improvement of ANZ Bank New Zealand’s processes and training to strengthen modern slavery risk management.

1. An internal report all ANZ employees are required to complete if a transaction, activity or behaviour seems inconsistent with a customer’s normal activities. 2. Consists of three questions: 1) In my team, it feels safe to ask questions, make mistakes, highlight problems and take social risks. 2) When I speak up I feel like my ideas, opinions and concerns are heard. 3) I can raise issues and concerns in ANZ without fear of reprisals or negative consequences. 3. Results include employees and contingent workers. Data sourced from August 2025 Pulse survey. Includes Suncorp Bank. 4. Results include employees and contingent workers. Data sourced from August 2024 Pulse survey. Excludes Suncorp Bank.



Whistleblower Policy

Our approach

ANZ’s Whistleblower Policy and Program⁴ are key components of our conduct risk management approach and corporate governance framework. The Board has oversight and governance of the Policy and Program. A de-identified summary of material whistleblower matters is reported to the relevant Board committee quarterly and to the Operational Risk Executive Committee.

The Whistleblower Policy outlines:

- How eligible whistleblowers can report concerns;
- The types of misconduct concerns that may be covered by the Policy including an actual or suspected breach of modern slavery legislation and/or human rights standards;
- The protections applied to whistleblowers;
- How the concerns will be considered and/or investigated; and
- Other relevant resources.

The Whistleblower Policy sets out who can raise a report. This includes current and former ANZ employees, contingent workers, suppliers, an officer or associate of ANZ Group, relatives or dependents of the above, and third-party intermediaries such as brokers, financial planners and others.

The Whistleblower Policy is promoted to employees internally through the Whistleblower Program and is reviewed regularly under our Group Policy Framework. A copy is available at anz.com/corporategovernance.

Building awareness

All employees and contingent workers are required to undertake annual mandatory training on their obligations and responsibilities under the Whistleblower Policy.

Whistleblower Investigators, Whistleblower Protection Officers, and eligible recipients of whistleblower reports (including ExCo⁵ and Board members) receive role-specific training to help ensure they understand their obligations under applicable laws including how to appropriately handle and, where applicable, investigate reports.

Additional training was also run throughout 2025 to build awareness of the Whistleblower Program and whistleblower protections.

Human Rights Grievance Mechanism

We support the United Nations Guiding Principles on Business and Human Rights (UNGPs), including through providing access to our Human Rights Grievance Mechanism (Mechanism). Our Mechanism provides a channel for grievances to be submitted to ANZ by people and communities who consider their human rights have been impacted by an ANZ large business lending customer.⁶

For a grievance to be accepted into the Mechanism, the customer must consent to ANZ disclosing the existence of a current or former lending relationship to those who submitted the grievance and to participating in the Mechanism. The Mechanism is designed to promote responsible business conduct, under a framework through which:

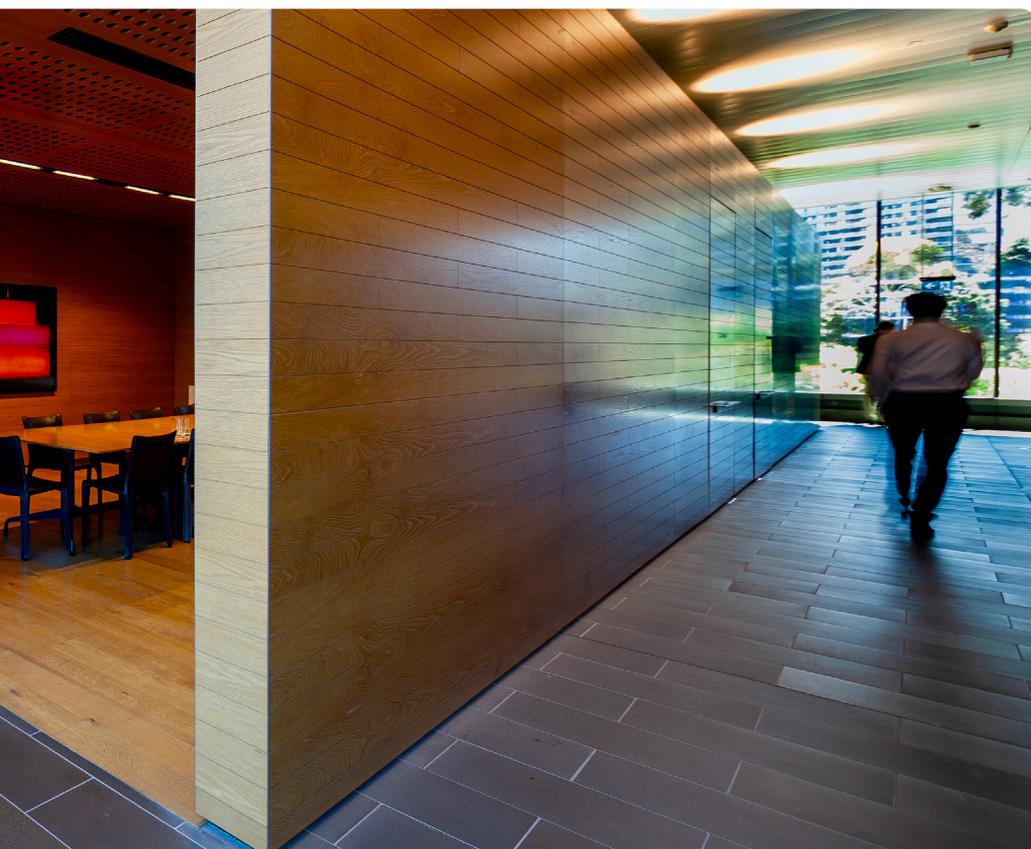
- Efforts can be made to resolve grievances about alleged human rights impacts associated with large business lending customers, including through dialogue; and
- Feedback and recommendations in relation to our policies and processes can be provided.

We updated our Mechanism Framework following a review that included engaging with external and internal stakeholders. The review informed several refinements and clarifications that improve the operational effectiveness of the Mechanism. The updated Mechanism Framework was endorsed in April 2025 by ANZ’s Board with oversight from ExCo.

In 2025, we received two grievances: one has closed with a response provided, and the other is under assessment.



Our Human Rights Grievance Mechanism Framework and our grievance reporting is available at anz.com/human-rights



⁴. Includes Suncorp Bank. ⁵. Comprises ANZ’s most senior executives. The members of ExCo are available at anz.com/exco. ⁶. Large business lending customers are current or former lending customers of ANZ’s Institutional division.

International standards and collaboration

We consider internationally recognised human rights frameworks, standards and goals when developing our approach to assessing and addressing modern slavery risk, including the below.

- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.
- United Nations Guiding Principles on Business and Human Rights (UNGPs).
- Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises (OECD Guidelines).
- Sustainable Development Goals (SDGs), including target 8.7 to eradicate forced labour and end modern slavery and human trafficking.

We are also a signatory to the United Nations Principles for Responsible Banking, a framework seeking to ensure the strategy and practice of signatory banks aligns with the vision society has set out for its future in the SDGs and the Paris Agreement.¹

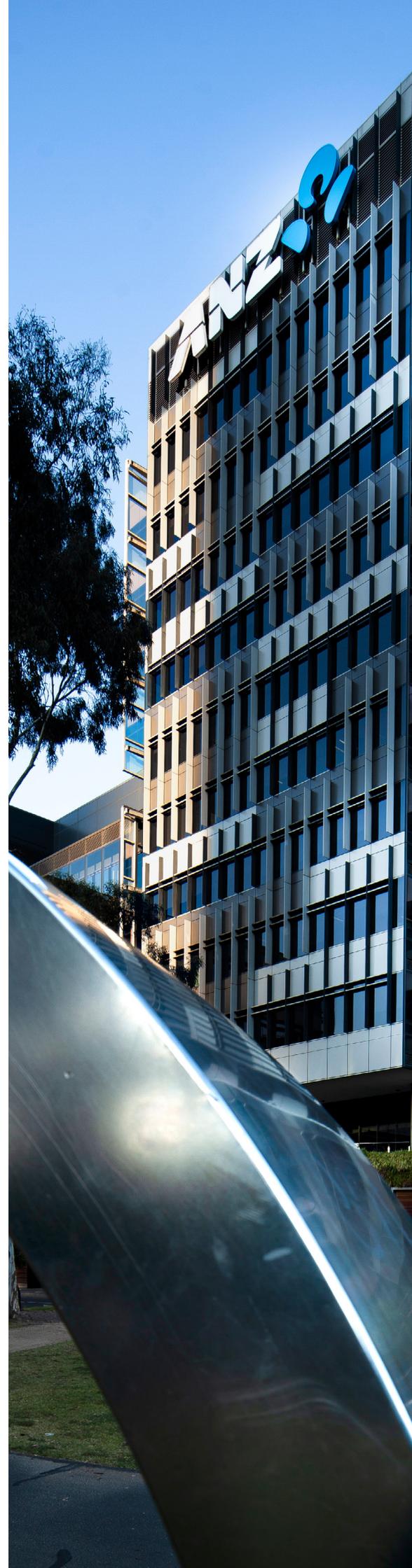
Over the past several years, we have engaged with other organisations to improve understanding and develop ideas to manage modern slavery risks. During 2025, this included:

- The Australian Banking Association Modern Slavery Working Group, which aims to develop an industry position on the practical response to modern slavery in member banks.
- The Office of the New South Wales Anti-slavery Commissioner.
- The New Zealand Ministry of Business, Innovation and Employment on guidance to support ethical and sustainable work practices, with a focus on migrant exploitation.

- ANZ New Zealand Investments Limited's Responsible Investment team's participation in the Responsible Investment Association of Australasia Human Rights Working Group.
- ANZ Bank New Zealand participation in *The Collaborative Advantage*, an industry working group co-hosted by the Sustainable Business Council, Deloitte and Walk Free, dedicated to advancing social, economic and environmental goals.

During 2025, we also joined the Modern Slavery Banking Community of Practice with other major Australian banks to discuss opportunities and challenges facing the Australian financial sector in relation to modern slavery reporting requirements, best practice and industry trends.

¹. A legally binding international treaty on climate change adopted at the UN Climate Change Conference (COP21) in Paris in 2015. Its overarching goal is to hold "the increase in the global average temperature to well below 2°C above pre-industrial levels" and pursue efforts "to limit the temperature increase to 1.5°C above pre-industrial levels".



Identifying, assessing and managing modern slavery risks

Identifying risks

We seek to identify our salient human rights issues according to where we could potentially cause, contribute or be directly linked to the most significant negative human rights impacts. Our salient human rights issues include corruption and bribery as well as the impacts to:

- Safety and security of our people
- Labour rights, including modern slavery
- Privacy, data protection and ethical artificial intelligence (AI)

- Environmental protection
- Land access and use
- Indigenous rights and inclusion

Our salient human rights issues refer to broad topics. Not all impacts relating to a salient human rights issue will be negative.

It may not be possible for ANZ to control or avoid all negative human rights impacts but we seek to reduce their likelihood and, if they occur, respond appropriately.

Our approach to identifying modern slavery risks is guided by the UNGPs' categories of "causing", "contributing to", or being "directly linked to" adverse human rights impacts.



For more information on ANZ's salient human rights issues see our 2025 ESG Data and Frameworks Pack available at anz.com/esgreport

Assessing risks

We periodically conduct a risk assessment to understand and identify where our potential to cause, contribute to, or be directly linked to modern slavery is most likely to arise across our operations and value chain.

This assessment considers internal data and insights from across our business, such as loan portfolio composition and location, and external research from organisations with expertise in modern slavery.² We consider certain factors to help identify areas that may give rise to a higher-risk of modern slavery, such as:

- Certain higher-risk sectors e.g. agriculture, manufacturing, domestic work.

- Certain countries with a higher estimated prevalence of modern slavery.
- Industries that employ unskilled or low-skilled workers e.g. labouring, cleaning.
- Nature of the employment relationship e.g. seasonal or temporary workers.
- Prevalence of 'at-risk' groups e.g. migrant workers, children, and women.

To assist in prioritising the program of work related to the management of modern slavery risks, we assess our likely exposure to, and the severity of, modern slavery risks at a Group level across our supply chain and operations.

We also consider which existing policies, standards and processes may help mitigate risk and improve our ability to change practices and behaviours, for example with our customers and suppliers. ANZ's policies and standards are outlined on pages 8-9.

ANZ's modern slavery workstreams and Group-level assessment of risk are summarised in the below table and detailed on the following pages.



See page 26 for information on Suncorp Bank's risk assessment

Workstreams	Risk assessment	Location of disclosure
→ Supply chain – managing the procurement of goods and services we source to run our business.	Higher-risk due to the volume and breadth of goods and services procured, and our international banking presence in a number of higher-risk countries.	Pages 15-17
→ Customers – providing a wide range of banking and financial services, with substreams for the activities of our Retail, Commercial and Institutional divisions.	Higher-risk , in some instances, due to both the sectors and countries in which we, and our customers, operate in.	Pages 18-22
→ Investments – investing customers' funds, including ANZ New Zealand Investments Limited and Private Bank, Australia.	Minor to moderate risk for investments made by our third party fund managers and New Zealand fund managers ³ due to risk-based drivers including our overall investment philosophy and approach to the selection of fund managers.	Pages 23-24
→ People – our Talent and Culture team assess modern slavery risks related to our people, including individuals directly employed by ANZ and our contractors.	Lower risk due to skills required, visibility of employment arrangements, and the location of most of our employees.	Page 25

² The Office of the Australian Anti-Slavery Commissioner, The Office of the NSW Anti-slavery Commissioner, UN Global Compact Network Australia, Business and Human Rights Resources Centre, United States Bureau of International Labor Affairs, RepRisk, Walk Free, Fair Supply, Property Council of Australia, Clean Energy Council, The Mekong Club, Fintel Alliance, International Labour Organization, Transparency International, Monash University, The University of Sydney, Pillar Two. ³ External fund managers are used for Private Bank customers in Australia. ANZ New Zealand Investments Limited (a subsidiary of our New Zealand division) uses external and internal fund managers.



Managing risks

Our Group Modern Slavery Working Group (Working Group) uses the risk assessment, described on the previous page, to help inform where we focus our program of work across the below three priority areas:

- Building awareness of modern slavery through training and education;
- Policy and process improvements; and
- Enhancing due diligence.

The Working Group is comprised of employees across the Group including:

- Group ESG Analytics and Advisory
- Risk and Compliance
- Group Procurement
- Financial Crime
- Investments
- Customer-facing divisions, including Suncorp Bank.

Members of the Working Group consult across the Group to seek to improve ANZ’s Group-wide practices in managing modern slavery risks and contribute to workstreams focused on different components of our businesses. These workstreams are discussed in detail throughout this Statement.

The Working Group also considers opportunities to improve our risk controls under our Enterprise Non-Financial Risk Program, building on a culture of proactive risk management and strong governance.

Supporting the Group approach, in 2025, ANZ Bank New Zealand established a local Modern Slavery Working Group bringing together key stakeholders across the New Zealand business and Group to coordinate efforts and share insights; and outlined a three-year roadmap to support continued uplift and risk mitigation.



See page 26 for detail on Suncorp Bank’s policies and processes to identify, assess and manage modern slavery risk while a phased transition to adopt the policies and processes of ANZ is underway

Non-financial risk management

As part of ANZ’s Non-Financial Risk (NFR) Framework¹, compliance incidents that meet reporting thresholds that involve a potential or actual breach of the law, regulation, industry standards and codes, or internal policies and procedures, are required to be recorded in ANZ’s NFR Hub for further assessment.

Risk events and any associated issues in the Hub are escalated through to the relevant functions and stakeholders for investigation, oversight and remediation, as applicable. This may include improvements to the risk and control environment as required. Depending on the materiality of the risk event, it may also be escalated to ANZ’s Operational Risk Executive Committee and Board. This includes risks in our operations and supply chain that relate to modern slavery and human trafficking.

Strengthening non-financial risk management is a strategic imperative for ANZ to protect customers, enable resilient operations, and sustain trust in the bank’s integrity. We acknowledge our existing NFR management practices have not always met expectations and recognise we have more work to do to uplift our management of NFR and to improve risk culture across the bank.

ANZ is focused on implementing sustained improvements to our non-financial risk management and risk culture across the Bank. We have established Program PACT (People, Accountability, Customers and Trust) to deliver on our commitments, which align to our broader ambition to build a strong, risk-aware culture that prioritises accountability and consistently delivers good customer, risk and business outcomes, to manage NFR.

¹ The Non-Financial Risk (NFR) Framework enables ANZ to holistically, consistently and effectively identify, assess, remediate, monitor and report on non-financial risk. It is made up of a number of different elements that collectively inform and enable the way we manage non-financial risk at ANZ.

Supply chain

In 2025, we spent \$5.8 billion² (2024: \$5.1 billion³) on procuring goods and services from more than 4,700⁴ (2024: 5,200³) suppliers across all reporting entities and divisions, with 90% of this spent by ANZ Australia and New Zealand. Key areas of spend include technology, group services (including property, travel and banking services) and marketing, people and professional services.

Spend by commodity⁴

Technology	46%
Group services	39%
Marketing, people and professional services	15%

ANZ spend by geography⁴

Australia	77%
New Zealand	13%
Asia	10%
Europe, Middle East and America	1%
Pacific	<1%

Identifying supply chain risk

Our Group Procurement team applies a risk assessment matrix to identify where modern slavery risks are most likely to arise in our supply chain.

The matrix looks at our procurement categories, spend, likelihood of forced labour⁵, geography, and the potential impact on people. It also takes the wider supply chain into account. For example, a supplier may be located in a low-risk country but still use manufacturing in higher-risk locations, such as for corporate uniforms.

We are guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs) to understand where we could cause, contribute to, or be directly linked to modern slavery. The result is a risk assessment that seeks to identify low, medium and high-risk categories.

In applying the matrix, we have identified the following categories as higher-risk:

-  Devices
-  Promotional items
-  Corporate wardrobe
-  Stationery
-  Construction
-  Facilities management (e.g. cleaning and security)
-  Furniture and fittings
-  Fleet (e.g. cars provided to our frontline employees)
-  Solar panels
-  Drivers of specifically chartered buses transporting ANZ employees to work

These categories accounted for approximately 14%⁴ of our overall procurement spend in 2025. These categories trigger extra due diligence requirements in ANZ's Third Party Risk Management (TPRM) program through the modern slavery module which was implemented during 2025. Further information on ANZ's TPRM program is available on the following page.

Building awareness

Sourcing employees in the Group Procurement team undertake specialised training on modern slavery risks in the supply chain which covers:

- What modern slavery is;
- Potential impacts on individuals, companies and society;
- Modern slavery legislation and our response;
- Supply chain impacts and how we can minimise the potential risks; and
- What they can do if they suspect modern slavery.

In 2025, the training was updated to include a new case study to demonstrate the complexity of supply chains and how to identify modern slavery risks. The training is mandatory for all sourcing employees in Group Procurement and optional for other employees. In 2025, 97% of Group Procurement employees completed the training.



Other modern slavery-related training made available to employees is outlined on page 19

2. Presented on a cash expenditure basis. Includes Suncorp Bank. 3. Includes Suncorp Bank from 31 July 2024 to 30 September 2024. 4. Includes Suncorp Bank. 5. Likelihood assessment informed by 'Global Estimates of Modern Slavery: Forced Labour and Forced Marriage' (2022), developed by the International Labour Organization, Walk Free, and the International Organization for Migration available at [walkfree.org/reports/global-estimates-of-modern-slavery-2022/](https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/).

Third party risk management

We acknowledge the critical role third parties play in delivering services to, or on behalf of, ANZ as well as the evolving industry practices and regulatory requirements concerning third party risk management.

Our Third Party Risk Management (TPRM) framework, policy and underpinning processes have enhanced existing practices and established a more integrated and comprehensive approach to the way we identify, assess and manage risks associated with our third parties, including ESG-related risks. This includes improved clarity to support our employees and the ongoing management and monitoring of third-party risks, in line with our risk management and compliance policies.

The TPRM Policy and Standard set the minimum requirements all suppliers to ANZ are assessed against and seeks to more clearly define responsibilities and to ensure transparency of risk management throughout the third party's relationship with ANZ. This builds on historical initiatives to enhance our ability to identify bribery, corruption and human rights issues associated with suppliers and vendors engaged by ANZ.

Supplier policies and processes

Our Supplier Code of Practice (SCOP) outlines minimum expectations for suppliers on topics such as human rights and workplace relations, occupational health and safety, ethical business practices, information management and confidentiality, accessibility, environmental management and supplier diversity. The SCOP is informed by the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational

Enterprises and the Principles of the United Nations Global Compact, and aligns with our Code of Conduct.



More information on our Supplier Code of Practice is available at anz.com/sustainable-procurement

We include SCOP clauses in new and renewed supplier contracts, with 83%¹ of all live supply contracts including SCOP clauses. Our usual practice is to include separate contractual clauses covering human rights and modern slavery in ANZ standard contract templates. Where we are using the supplier's standard contract, we outline:

- A requirement to comply with relevant modern slavery laws, including legislation prohibiting modern slavery practices; and
- A specific modern slavery clause requiring suppliers take reasonable steps to address modern slavery in their business and supply chain.

Our Procurement Policy outlines risk management guidelines, and commercial and operational considerations in managing suppliers. In support of the Policy, a Modern Slavery Supplier Toolkit in our Procurement Category Management Playbook helps guide procurement employees. The Playbook sets out the mandatory and optional steps for employees where a primary requirement of their role is to procure goods or services on behalf of ANZ. The Playbook also includes steps to minimise the risks of modern slavery and to understand what to do if an instance of modern slavery is suspected.

Supplier due diligence

We expect suppliers to share our commitment to adopt a fair, safe, responsible and ethical approach to business, including by adopting safeguards that mitigate human rights risks.

Contracted suppliers, including subcontracted suppliers, are screened as part of ongoing supplier due diligence using a third-party tool to assess performance against 28 ESG themes including environmental footprint, community relations, employee relations and corporate governance, and human rights. In the first instance, this process involves a database search to identify whether any allegations have been made or reported in relation to each supplier.

If any matters which ANZ considers significant are identified, we will typically engage with the supplier to seek a response and then consider whether we are comfortable the supplier is managing the issue in line with our expectations as detailed in the SCOP.

If we consider a supplier's performance below acceptable local industry or ANZ expectations, we engage with them to identify best practice across the supply chain and understand the steps the supplier will take to remediate the issue. Where it is evident a supplier is not committed to this engagement, ANZ will review the business relationship on a case-by-case basis. This may result in the relationship being exited where the supplier is unwilling to adapt its practices in an appropriate timeframe.

ANZ considers that this is consistent with the guidance issued by the Office of the United Nations High Commissioner for Human Rights on what is expected from businesses under the United Nations Guiding Principles on Business and Human Rights (UNGPs).

In 2025, 4,099 screenings¹ were conducted (2024: 5,311²), including on our top 100 suppliers by spend. The reduction in screenings during 2025 is due to a change in methodology and a reduced supplier base. Screenings identified potential issues in six instances (2024: 9), with ANZ working with these suppliers to understand the issue, mitigation actions taken (where relevant), and close out the investigation of the potential issue. One potential issue in relation to human rights was identified through ANZ's due diligence process, which flagged that a logistics provider – used by a supplier of ANZ – had a customer on the United States Uyghur Forced Labour Prevention Act Entity (UFLPA) List. The supplier informed ANZ that it has no relationship with the flagged company and the third-party tool provider confirmed that there was no direct connection to the entity on the UFLPA list.

We continue to monitor and engage with our suppliers on issues we identify as part of this due diligence process to help identify and respond to the risks of modern slavery. For example, we work with higher-risk suppliers to understand their approach to modern slavery including quarterly factory audit tracking on factories manufacturing uniforms for the higher-risk category, corporate wardrobe.

Our procurement tender process requires potential suppliers to confirm they do not use forced labour themselves or tolerate it in their supply chain. Suppliers are required to explain how they minimise the risk of forced labour in their business and operations. There are additional questions for tenders where there is a potential higher likelihood of modern slavery which cover areas such as training, audits and how they manage the extended supply chain.

Our attestation process is targeted, focusing on human rights, governance, ethical business practices and environmental management. In 2025, we sought attestations from higher-risk suppliers in countries such as India, China, Papua New Guinea, the Philippines, Vietnam, and Pacific nations with a focus on higher-risk categories (e.g. cleaning, security). We continue to encourage suppliers to attest to the SCOP. Upon completion of the attestation, suppliers in these countries were provided with a copy of the Walk Free's Modern Slavery Benchmarking Tool to help companies establish good practices to assess and address modern slavery risks in their operations and throughout their value chain.

Key actions from our 2025 program of work (supply chain) included:

Building awareness

- Delivered updated specialist training on mitigating modern slavery risks in the supply chain to Group Procurement employees. Modern slavery training completion is mandatory for sourcing employees in Group Procurement, with a 97% completion rate in 2025.

Policy and process

- Continued our contract uplift program to seek upon renewal of legacy contracts, to include SCOP and modern slavery clauses.
- Ongoing implementation of the TPRM program to improve visibility of supplier-based and evidence risk-based due diligence activities.
- Implemented a modern slavery module within the TPRM system, which centralises risk evaluation and management internationally of suppliers.³

Due diligence

- Sought attestation from suppliers in higher-risk countries and engaged with them to discuss the purpose of the SCOP with 66% participating.

1. Includes Suncorp Bank. 2. Included Suncorp Bank from 31 July 2024 to 30 September 2024.
3. The loading of suppliers into the TPRM program is ongoing.

Customer relationships

We manage customers in three broad segments and structure our customer relationships to reflect these:

- The **Retail** segment in Australia, New Zealand and the Pacific.
- The **Commercial** segment in Australia, the **Business and Agri** segments in New Zealand, and commercial customers in the Pacific.
- The **Institutional** segment includes institutional, corporate, and government customers across Australia, New Zealand and international.

Our exposure to modern slavery risks includes the potential impact on people and communities from the actions or omissions of our customers to which we provide banking products and services. We strive to build awareness of modern slavery risks through our customer relationships and manage these risks through policies and procedures including, in certain circumstances, undertaking enhanced human rights due diligence and transaction monitoring.

Where appropriate, we engage with our customers to advise that we expect them to identify, manage, monitor and act on adverse impacts on human rights, including modern slavery.

Where a large business customer acts inconsistently with our expectations, we may seek to use leverage, including engaging in dialogue and, where appropriate, to encourage them to identify and disclose specific and timebound improvement plans. We may decline further financing or exit the relationship if a large business customer is unwilling to adapt its practices in an appropriate timeframe.

Identifying customer risks

We use the following risk-based approach to identify where our customers are most likely to have modern slavery risks:

- A 'top-down' consideration of risk factors to help identify where the potential for modern slavery is higher, to target our efforts.
- A 'bottom-up' approach through our policies, processes, screening tools, financial crime threat management processes, annual reviews and customer engagement. These are risk-based in their application and help us understand how certain customers are responding to allegations or potential instances of modern slavery.
- An 'issues-based' approach where we review reputable external sources to identify modern slavery risks in sectors and/or risks associated with specific customers, and seek to engage certain customers on identified issues, as we consider appropriate.

Examples of higher-risk modern slavery areas identified through this approach in our customer relationships include:

- Institutional customers operating across Asia in higher-risk sectors such as extractives, textiles and fashion, fishing, electronics, manufacturing and agriculture.
- Commercial businesses in Australia and New Zealand operating in sectors of the economy with a higher prevalence of modern slavery and other human rights risks, including agriculture, cleaning, construction, fishing and textiles and fashion.
- Customers potentially exposing ANZ to alleged criminal activity through money laundering and terrorism financing.

In 2025, we continued to use internal and external data to target our review of higher-risk areas focusing on our large business customers.



Details on Suncorp Bank customers are outlined on pages 26-27 while a phased transition to adopt the policies and processes of ANZ is underway

Building awareness

Case study



In 2025, ANZ Bank New Zealand provided banking services to more than 1,500 new customers who held a Recognised Seasonal Employer (RSE) visa.¹ These customers are seasonal migrant workers mostly from Pacific countries and are identified as a vulnerable customer group. ANZ Bank New Zealand also services business customers in the horticultural industry who rely on this workforce.

In 2025, training was developed for frontline branch employees in regions reliant on RSE workers. This was initially piloted with 16 employees in the Hastings branch, and focused on identifying at-risk customer groups, recognising indicators of modern slavery and knowing how to respond.

Employees who took part in the pilot were asked to evaluate the training. More than 90% of those who took part in the pilot training responded that the training had 'completely' or 'significantly' increased their understanding of the steps to take

if they suspected modern slavery, while all respondents rated the delivery of the training as effective. This feedback helped to inform further targeted learning and development at branches in Blenheim, Nelson, Papamoa and Katikati – all regions identified as higher-risk due to the large number of seasonal workers employed in local horticulture operations.

Employees who participated in this training (including the pilot) comprised more than 80% of employees from the branches involved.

1. Excludes returning RSE visa holders who have existing accounts.

Building awareness

Building on the engagement of our people, suppliers and customers in previous years, we continued to seek opportunities to raise awareness of modern slavery throughout our business in 2025. Outlined below are examples of mandatory training, targeted training and training that is available to all employees.

Mandatory training	Targeted training	What's available
<p></p> <p>All ANZ employees² must complete annual mandatory training on 'Financial Crime Essentials' which explains how ANZ can help 'break the link' between criminal organisations and behaviour, and the impacts on victims. In 2025, 99.93% of employees and contractors completed the training.</p>	<p></p> <p>In 2025, we provided targeted training to frontline bankers in specific higher-risk countries including Papua New Guinea to uplift employee understanding of our approach to social and environmental risk screening, including human rights and modern slavery.</p>	<p></p> <p>Training is available to Australian employees through a combination of online training, leader-led guidance and workshops to identify and support customers in need of extra care, which could include customers experiencing modern slavery.</p>
<p></p> <p>Sourcing employees in the Group Procurement team must complete specialised training on modern slavery risks in the supply chain. In 2025, 97% of Group Procurement employees completed the training.</p>	<p></p> <p>In 2025, ANZ Bank New Zealand delivered modern slavery training to around 200 employees as part of the roll-out of an upgraded risk screening tool. Targeted training was also delivered to frontline branch employees in some regions assessed as having higher exposure to modern slavery risk, and to the supporting customer onboarding team.</p>	<p></p> <p>The 'Modern Slavery – The Basics' online training module is available to all employees³ and contains information about possible modern slavery red flags, ANZ's risks and response, and the ways that concerns can be escalated.</p>
<p></p> <p>New employees with the authority to approve lending and customer onboarding in our Institutional division must complete mandatory training on social and environmental risks, which includes content relating to human rights and modern slavery.</p>	<p></p> <p>ANZ New Zealand Investments Limited's investment management team have access to online training on modern slavery which outlines international modern slavery laws and trends, and risk identification approaches.</p>	<p></p> <p>Employees⁴ have access to ANZ's modern slavery page on our intranet. It explains how to escalate modern slavery concerns and contains modern slavery resources with links to external and internal learning materials, including an external article published on 'Modern slavery: spotting the red flags'.</p>
<p></p> <p></p> <p>Details on modern slavery training for Suncorp Bank employees is outlined on page 27</p>		<p></p> <p>We offer learning and development opportunities on ESG risks and opportunities through our ESG@ANZ – Mindset 2030 online training program. The program is available to all employees⁴ to learn about our approach to ESG. It includes foundational training on human rights and modern slavery and a specialised module covering topics such as identifying third party and customer red flags, and enhanced human rights due diligence. Since the 10-module foundational training program was launched in 2023, over 6,400 employees have completed the program. This included over 70% of employees in our Institutional division, which the training program was initially established to support, exceeding our training and capability target of 65%.</p>

2. Excludes Suncorp Bank. Suncorp Bank employees must complete annual mandatory training on the 'Introduction to Anti-Money Laundering and Counter-Terrorism Financing'. 3. Excludes Suncorp Bank. 4. Includes Suncorp Bank.

Due diligence for institutional customers

Social and Environmental Risk Policy and Standard

ANZ Bank Group assesses and manages potential social and environmental impacts of our lending decisions to large business customers through the application of our Social and Environmental Risk Policy and Social and Environmental Risk Standard (including specific requirements for 'sensitive sectors'). The Social and Environmental Risk Policy and Standard apply to ANZ Bank Group, excluding Suncorp Bank.¹

Our Social and Environmental Risk Standard provides our bankers with more detail on our internal requirements and the expectations we have of our large business customers, having regard to ANZ's more specific policy positions, as applicable. It includes core requirements such as consideration of human rights and modern slavery.

We consider human rights impacts when evaluating customers through our Social and Environmental Risk Screening Tool, and expect our large business customers to:

- Engage with their affected and potentially affected stakeholders and provide access to effective remedy;
- Establish and/or participate in effective grievance processes for affected individuals and communities;
- Consent to the disclosure of a banking relationship to affected people who have submitted a human rights grievance through ANZ's Human Rights Grievance Mechanism; and
- Cooperate with ANZ in the application of the Equator Principles and International Finance Corporation Environmental and Social Performance Standards, where appropriate.

Where ANZ's expectations are not met, we may seek to engage with the customer, and, where appropriate, encourage them to identify an improvement or remediation plan. We may also consider our ongoing relationship with the customer. Where determined necessary, ANZ will undertake enhanced human rights due diligence.



More information on the Social and Environmental Risk Policy and Standard is available at anz.com/social-and-environmental-risk-management

Equator Principles

As a signatory to the Equator Principles since 2006, we seek to ensure that these projects are developed in a manner that is socially responsible and reflect sound environmental management practices. We commit to implementing the Equator Principles through our internal environmental and social policies, procedures and standards for financing projects.

We use the Equator Principles and the International Finance Corporation Standards as needed, as a minimum standard for due diligence and monitoring to support responsible decision-making for Project Finance.² The Equator Principles complement our Social and Environmental Risk Policy and Standard, which also apply to Project Finance transactions.



More information on the Equator Principles is available at anz.com.au/about-us/esg/policies-practices/equator-principles

Due diligence for retail and commercial customers

Through Know Your Customer (KYC) due diligence, we seek to ensure we know who our customers are and the purpose of their relationship with ANZ by completing due diligence proportionate to the money laundering and terrorism financing risk posed.

This involves:

- Verifying identities using reliable documents or electronic data.
- Understanding how and why our products and services will be used.
- Detecting and deterring fraud, scams and other financial crime.

We seek to conduct detailed customer conversations with certain customers in our retail and commercial segments to further understand their business and financial situation. This allows us to consider customer needs, financial

situation, goals and the banking solutions that best suit them. By understanding the nature of our customers' businesses, and conducting ongoing due diligence, we are better placed to potentially identify unusual matters.

For our large commercial customers, where ANZ perceives that the customer or their activities may have a material impact, we apply our Social and Environmental Risk Policy and Standard as discussed above.

¹. Suncorp Bank maintains its own Responsible Banking Policy which outlines its approach to the management of ESG risks and opportunities across Suncorp Bank. The Responsible Banking Policy applies to Suncorp Bank and all products and services provided by Suncorp Bank to its customers. ². The Equator Principles apply to Project Finance, Project-Related Corporate Loans, Project-Related Acquisition Finance, Project-Related Refinance or Bridge Loans (each as defined in the Equator Principles, and collectively "Project Finance").

Tools and processes

The table below outlines examples of key tools and processes that are used within the credit process across different customer cohorts to help identify, assess and manage social risks.

Tools and processes	Customer cohort
<p>Social and Environmental Risk Screening Tool</p> <p>A tool used to facilitate qualitative risk assessments of social and environmental risks, including impacts on human rights and modern slavery. It also assists bankers in the application of the Social and Environmental Risk Policy and Standard.</p> <p>This assessment is ordinarily performed when conducting due diligence on new to bank³ customers, when reviewing existing customers (at least annually), or prior to a material transaction, or when ANZ Bank Group becomes aware of:</p> <ul style="list-style-type: none"> • a material change to the customer’s activities, or • a material impact occurring. 	<p>Customers within ANZ’s Institutional division (our <u>large business customers</u>)</p>
<p>Reputation Risk Radar</p> <p>A service which identifies certain reports and findings of social, environmental, and significant governance incidents and allegations against existing and prospective customers. Notable incidents and allegations are referred, where appropriate or relevant, to applicable risk management forums in which social, environmental and credit risks are considered.</p>	<p>Large business customers of ANZ Bank Group’s Institutional division.</p>
<p>Enhanced Human Rights Due Diligence</p> <p>A process that seeks to identify and assess potential and actual adverse human rights impacts associated with our large business customers and their activities, to support engagement with our customers to understand their approach to respecting human rights, and where necessary the steps taken to avoid or mitigate adverse impacts.</p>	<p>Large business customers of ANZ’s Institutional division, when identified through our Social and Environmental Risk Screening Tool.</p>
<p>Equator Principles</p> <p>A risk management framework that determines, assesses, and manages social and environmental risks when financing large infrastructure and industrial projects.</p>	<p>Project financing or export finance provided to ANZ’s Institutional customers, as applicable.</p>
<p>Business and Agri Environmental and Social Screening Tool</p> <p>A tool that seeks to ensure that environmental and social risks associated with a customer or transaction are identified and where required documented. This was upgraded during the year to integrate modern slavery and broader social risk questions and guidance into the assessment.</p>	<p>Customers within ANZ Bank New Zealand’s Business and Agri segment.</p>

Case study



ANZ Bank New Zealand’s modern slavery program aims to identify and escalate modern slavery risks. In 2025, seven modern slavery-related concerns were escalated to the ESG Centre of Excellence team. Four escalations were raised as a result of bankers’ customer assessments using the New Zealand Business and Agri Environmental and Social Screening Tool. Three further

escalations were identified as potential ‘red flags’ raised through other channels.

One escalation involved a personal banking customer who visited an ANZ New Zealand branch and made claims of excessive work hours, lack of payment and coercion. Branch employees referred the customer to support services, escalated the case to authorities, and maintained follow-up to ensure support was in place.

Of the seven escalations during the year, six were addressed as per the New Zealand modern slavery escalation process described on page 10, with support continuing to be provided on one escalation at the time of publishing this Statement.

³. Customers where ANZ has had no meaningful lending relationship within the last 12 months. Entities or assets acquired from existing ANZ customers are not classified as new to bank customers.

Financial crime

Our Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Program and Policy Summary¹ sets out our approach to detecting and deterring money laundering and terrorism financing (ML/TF). Risk assessments are completed at an enterprise, country, product and channel level to identify, manage and mitigate ML/TF risk across the organisation.

Ongoing customer due diligence

We undertake ongoing customer due diligence which includes:

- Reviewing customer due diligence related documents, data or information for the purpose of managing and mitigating ongoing ML/TF risk;
- Monitoring customers transactions and behaviours to identify unusual matters that require investigation and potential reporting to the Australian Transaction Reports and Analysis Centre (AUSTRAC). This is undertaken through a combination of transaction monitoring and other methods of observation; and
- Undertaking an enhanced level of customer due diligence and monitoring for customers who present an increased level of ML/TF risk.

In addition, we use targeted intelligence to identify indicators of crimes such as child exploitation, sexual servitude and labour hire abuse – all forms of modern slavery.

Partnerships and programs

Financial intelligence plays a critical role in the detection and disruption of organised criminal activity, including potential instances of modern slavery. We collaborate with several partners including regulators, government agencies and law enforcement to better understand the evolving threat environment and take proactive and meaningful action. Through these partnerships we:

- Embed intelligence specialists and deploy security-cleared employees to law enforcement and regulatory agencies;
- Support initiatives focused on dismantling child abuse networks, identifying modern slavery or human trafficking or dismantling groups seeking to defraud and scam our customers; and
- Develop financial intelligence tools and algorithms that detect criminal patterns targeting vulnerable individuals.

Case study



Following an interaction with a customer at a branch, employees raised concerns about possible vulnerability and difficult working conditions of the customer. Several warning signs were identified, including issues with the customer’s employer, inability to take time off work, living arrangements and overall wellbeing.

A formal investigation was carried out by ANZ’s Financial Crime Threat Management team, and a report was submitted in line with regulatory requirements.

At the same time, the branch employees worked closely with internal ESG teams that specialise in modern slavery risks to provide support and connect the customer with expert advice. This collaborative effort led to positive outcomes as ANZ was able to connect the customer with an immigration specialist who supported the customer in securing a work visa, enabling them to find employment in a safer and more supportive environment.

Partnerships include the AUSTRAC Fintel Alliance, the Australian Federal Police (AFP), including the Joint Policing Cybercrime Coordination Centre (JPC3) and the Australian Centre to Counter Child Exploitation (ACCCE).

Insights from these partnerships inform our Financial Crime team’s refinement of proprietary algorithms and intelligence platforms, enabling analysis of billions of transactions and delivery of actionable data. These partnerships also support specialist training exchanges, ensuring our teams maintain current knowledge in a dynamic and evolving threat landscape.

ANZ Bank New Zealand is a member of the Financial Crime Prevention Network (FCPN), a public-private partnership aiming to enable information and intelligence sharing and collaboration with law enforcement to identify and prevent financial crime. This includes regulatory working groups and engagement in tactical investigative and discovery work.

Key actions from our 2025 program of work (customer relationships) included:

Building awareness

- Provided mandatory training to 99.93%² of employees and contractors on financial crime including on the link between money laundering and crimes, including modern slavery.³
- Delivered new training to frontline retail bankers in New Zealand that have high levels of migrant workers in their community.
- Published an external article for employees and other stakeholders on the identification of red flags for modern slavery.

Policy and process

- Updated our Human Rights Statement and Human Rights Grievance Mechanism Framework following a review that included engaging with external and internal stakeholders.

Due diligence

- Completed risk assessments at an enterprise, country, product, and channel level to identify, manage and mitigate money laundering and counter terrorism risk across the organisation.
- Upgraded the Business and Agri Environmental and Social Screening Tool which assists our bankers in New Zealand to seek to ensure that environmental and social risks associated with a customer or transaction are identified and where required documented.

1. Excludes Suncorp Bank. 2. Includes Suncorp Bank. 3. Training is tailored for specific roles, and includes training related to modern slavery risks, amongst other financial crime related typologies.

Investments

Our investments business comprises two distinct parts: ANZ New Zealand Investments Limited and ANZ Private Bank, Australia. Each is considered in the following sub-sections.

ANZ New Zealand Investments Limited

Overview

ANZ New Zealand Investments Limited (ANZI) manages over NZ\$34 billion in funds under management⁴ (FUM) for more than 650,000 investors throughout New Zealand, including funds from customers of ANZ Private in New Zealand. FUM comprises a range of asset classes including:

- International equities;
- International fixed income;
- Listed property and listed infrastructure managed by third party external managers (external managers); and
- Australasian equities and fixed income managed by New Zealand-based employees.

Identifying investment risks

ANZI's exposure to modern slavery risks is identified by assessing its external managers' approach to modern slavery, and evaluating country risk based on underlying investments. Walk Free's Global Slavery research is also utilised, specifically the score on prevalence of modern slavery risks per country.

In 2025, changes to one of ANZI's international fixed income mandates increased sovereign bond exposure to certain countries in emerging markets. As a result, ANZI determined there is a minor to moderate risk⁵ of investing in entities or governments that cause, contribute to, or are directly linked to modern slavery.

Building awareness

ANZI was one of 28 signatories to support the introduction of laws to address modern slavery in New Zealand and across its international supply chains. ANZI recognises that the introduction of modern slavery legislation would align New Zealand with global standards and trading partners' practices on human rights.

As modern slavery may be considered in the investment decision making process, ANZI's investment management team have access to online training on modern slavery which outlines international modern slavery legislation, and trends and risk identification approaches. In 2025, 100% of the investment management team completed the training, meeting our annual target.

ANZI is a member of the Responsible Investment Association of Australasia (RIAA), and ANZI employees participate in the RIAA Human Rights Working Group (RIAA HRWG). The RIAA HRWG meets quarterly to discuss ways to better engage with investee companies to prevent and address human rights abuses and violations, including modern slavery.

Policy and processes

ANZI has a Responsible Investment Framework⁶ that details how ESG considerations are integrated into the research, selection and management of investments. The framework covers social factors such as human rights, including modern slavery.

ANZI requires in-house and external managers to attest to their compliance with its modern slavery requirements by confirming modern slavery risks are considered in their investment process and that modern slavery is a theme of their stewardship activities.

If an external manager were to fail to comply with ANZI's modern slavery requirements, it would be a breach of the Investment Management Agreement, potentially resulting in termination of the investment mandate. Depending on location, it may also be a breach of modern slavery requirements in their home jurisdiction.

A core component of ANZI's Responsible Investment Framework is demonstrating stewardship with the companies being invested in. Both ANZI and its external managers engage with investee companies on ESG issues. Human rights is one of the primary engagement themes outlined in ANZI's most recent *Stewardship Code Aotearoa New Zealand* Report available at anz.co.nz/personal/investments/about-anz-investments/responsible-investing/.

Due diligence

ANZI monitors the activities of its in-house investment managers and external managers. Monitoring includes external managers confirming modern slavery risks are considered across their portfolios and may also include security-specific modern slavery risk discussions. In addition, external managers are expected to screen for modern slavery risks across their portfolios. As part of ongoing monitoring, the ANZI's Responsible Investment team may identify companies involved in controversies (such as human rights issues) and may assess whether those



ANZ Group's risk assessment approach is outlined on page 13

⁴. As at 30 September 2025. ⁵. In 2024 the risk assessment was 'lower to moderate'. ⁶. For more information see ANZ Investments Responsible Investment Framework at anz.co.nz/personal/investments/about-anz-investments/responsible-investing/.

companies should be excluded from ANZI's portfolios.

Following the recent increase in exposure to emerging markets, ANZI is closely monitoring how external managers integrate modern slavery risk into their investment strategies. This oversight is conducted through comprehensive in-house due diligence processes, including annual questionnaires and risk assessments, conducted in alignment with the legislative requirements of the Australian and UK Acts.

In 2025, ANZI enhanced its process for assessing controversies, including relating to human rights. This recognises that controversies are typically security-specific, rather than rules-based. A framework was designed to take a systematic approach to assessing whether an apparent controversy has sufficient evidentiary backing to support exclusion. Any companies excluded on this basis are publicly disclosed¹ quarterly. Based on the materiality of the issue, a company may be added to a watchlist for ongoing monitoring even if it has not been excluded.

ANZ Private Bank, Australia

Overview

ANZ Private Bank, Australia (ANZ Private) advises on around \$11.6 billion² on behalf of its clients. Funds under advice comprise a range of asset classes including:

- Australian and international equities;
- Australian and international fixed income;
- Global listed property and infrastructure;
- High-yield debt, alternatives; and
- Private markets strategies.

Identifying investment risks

ANZ Private's exposure to modern slavery risks is identified through its external fund managers and the sectors and companies in which they invest.

Policy and processes

External managers are assessed by ANZ Private's primary investment consultant. Assessments consider ESG factors and the process used to integrate the assessment into the investment management process. Information on the approach by third party managers to modern slavery risk is also requested.

Due diligence

ANZ Private engages external fund managers to understand their approach to ESG risk management screening, including modern slavery risk. Each year, ANZ Private requests the external fund managers who invest its discretionary diversified portfolios to:

- Provide an overview of their approach to modern slavery, including steps undertaken to understand and assess the modern slavery risks of investee companies' operations and supply chain;
- Advise whether they are required to report on modern slavery under the Australian Act and, if captured, provide a copy of the external manager's latest annual modern slavery statement; and
- Participate in engagement with ANZ on modern slavery.

During 2025, within our discretionary diversified portfolios, all external fund managers completed the above steps. If an external fund manager is unable or unwilling to complete this, ANZ Private will engage to understand why and if appropriate will commence enhanced monitoring.

The modern slavery statements of ANZ Private's external fund managers are used to inform future engagement. ANZ Private continues to discuss with external fund managers and seek to understand how they are engaging with underlying portfolio companies on modern slavery risks.

Key actions from our 2025 program of work (investments) included:

Building awareness

- ANZI was one of 28 signatories to support the introduction of laws to address modern slavery in New Zealand across our international supply chains.
- Online training modules on modern slavery were completed by 100% of ANZI's investment management team.
- Sharing insights gained through ANZI's Responsible Investment team participating in the RIAA HRWG.

Policy and process

- ANZI requests in-house and external managers to attest their compliance with its modern slavery requirements on an annual basis.
- Human rights is one of the primary engagement themes outlined in ANZI's Stewardship Code Aotearoa New Zealand Report.

Due diligence

- ANZI monitors both in-house and external managers to ensure that modern slavery risks are considered across their portfolios.
- ANZI Responsible Investment team has enhanced its process for assessing controversies, including those involved in human rights issues. A framework was designed to take a systematic approach on assessing whether an apparent controversy has evidentiary backing to support exclusion.
- ANZ Private engages external fund managers to understand their approach to ESG risk management screening, including modern slavery risk.

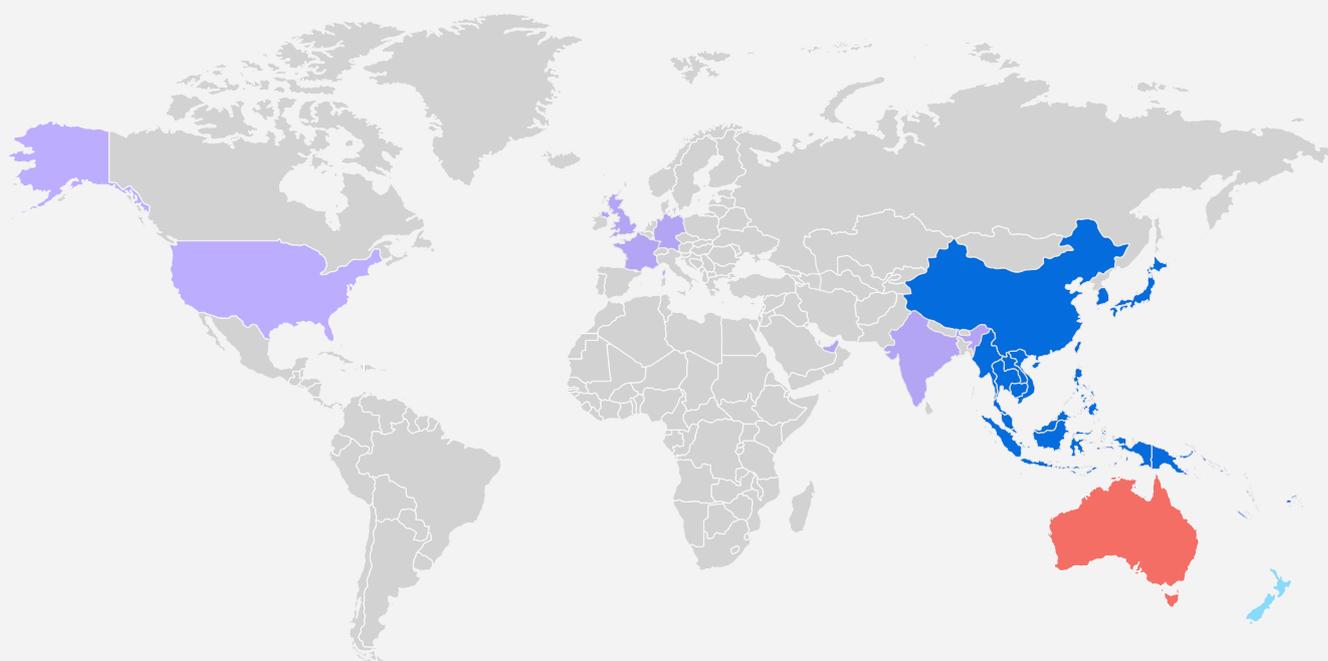
1. Available at anz.co.nz/content/dam/anzconz/documents/personal/investments-kiwisaver/anz-investments-excluded-companies-list.pdf. 2. As at 30 September 2025.

People

The majority of our workforce (79%³) is directly employed and paid by ANZ⁴, providing visibility and control of payroll processes and working conditions. Most employees are highly skilled to provide professional services, and contingent workers are typically also highly skilled and sourced from professional service firms.

While the immediate risk of causing, contributing, or being directly linked to modern slavery through our employment practices is relatively low, we continue to take steps and implement controls to manage potential risks.

Australia and New Zealand are where 66%⁵ of our employees live and work. Both are countries with a lower prevalence of modern slavery compared to other countries.⁶ Nevertheless, modern slavery can still occur in these countries and we acknowledge we have operations in countries with a higher prevalence of modern slavery.



Employees by region	Total at 30 September 2025
● Australia	22,232
● New Zealand	7,132
● Asia Pacific	5,399
● EAMEI ⁷	9,745
Total	44,508

One way we manage potential modern slavery risks across our business is by respecting the right to collective bargaining.

We have collective agreements covering employees in the following geographies in which ANZ and Suncorp Bank operate:

- Australia
- New Zealand
- Fiji
- Solomon Islands
- Papua New Guinea



Our approach to respecting human rights in our workplace is embedded in our policies and processes. The policies that promote a safe, diverse and inclusive workplace are outlined on pages 8-9

³ Includes Suncorp Bank. ⁴ ANZ's remaining workforce is made up of contingent workers. ⁵ As at 30 September 2025. Includes Suncorp Bank. ⁶ Global Slavery Index (2023) available at walkfree.org. ⁷ Europe, America, Middle East and India.

Suncorp Bank

This section covers the actions¹ taken to identify, assess and manage modern slavery and human trafficking risks in Suncorp Bank’s operations and supply chain.

Operations and supply chain

Suncorp Bank’s operations include the provision of banking and related services to Retail and Business Banking customers in Australia. In 2025, Suncorp Bank undertook a series of activities to monitor and mitigate risks across its business activities including:

- **Supply chain** – as a procurer of goods and services;
- **Customers** – as a provider of financial products and services; and
- **People** – as an employer.

Suncorp Bank takes a multi-layered approach to risk management to seek to ensure ethical practices and mitigate potential risks across its operations and supply chain. This includes a focus on the products and sectors that are identified as having a higher probability of potential for linkage to modern slavery.

Suncorp Bank’s supply chain includes the procurement of goods and services related to the provision of banking and financial services in Australia. Key areas of spend include technology, Group services (including property, travel and banking services) and marketing, people and professional services.

In accordance with its Responsible Banking Policy and if no regulatory barriers exist, Suncorp Bank may exclude doing business with a sector or a specific entity.



See page 15 for ANZ Group’s breakdown of spend, which includes Suncorp Bank

Identifying, assessing and managing risks

Supply chain

Suncorp Bank seeks to mitigate the risk of modern slavery-related practices in its supply chain by embedding modern slavery clauses in its standard contracting templates, which forms the basis for negotiations with suppliers.

Suncorp Bank has adopted ANZ’s Supplier Code of Practice (SCOP), as discussed on page 16, and as part of this seeks to include SCOP clauses in new and renewed contracts. Suncorp Bank has also adopted ANZ’s Third-Party Risk Management (TPRM) due diligence activities for new suppliers or suppliers that have renewed their contracts since ANZ acquired Suncorp Bank on 31 July 2024. ANZ’s TPRM due diligence activities are outlined on page 16. During this transition period, some suppliers remain on legacy Norfina Limited or their own contracts where no renewal has occurred since the transition to ANZ.

In 2025, Suncorp Bank undertook a retrospective Supplier Categories Risk Grading Review (Review) of all suppliers with legacy Norfina Limited or own contracts. Aligned to ANZ’s higher-risk

supplier categories outlined on page 15, the Review enabled Suncorp Bank to independently assess, identify, and manage supplier² risk and explore further targeted oversight and mitigation actions of these suppliers.

Customers

In 2025, Suncorp Bank undertook a series of activities to better understand the modern-slavery related risk of providing financial products and services to customers. Suncorp Bank seeks to mitigate the risks of modern slavery in business banking via a modern slavery risk assessment and other activities detailed on page 13 and to retail customers primarily via the use of anti-money laundering and counter-terrorism financing (AML/CTF) policies and protocols.

Suncorp Bank conducted a modern slavery risk assessment which analysed customers business lending portfolio exposures against identified high risk industries via the use of identified Australia and New Zealand Standard Industrial Classification (ANZSIC) codes.³ Through this assessment, Suncorp Bank re-assessed its exposure to industries deemed high risk, such as construction and agriculture.

High risk industry examples

Identified risk factors

Agriculture

- **Vulnerable populations:** Low and semi-skilled workers, seasonal workers, visa holders.
- **Business model:** Labour hire arrangements and contractors, incentive-based systems, low-cost margin business models and work-for-accommodation practices.
- **High-risk geographies:** Rural and regional Australia.

Construction

- **Vulnerable populations:** Low and semi-skilled workers; temporary, casual and holiday visa workers; immigrant labourers.
- **Business model:** Low-cost margin business models and work-for-accommodation practices.
- **Raw materials:** May be procured from geographies at a high risk of modern slavery.

1. This may include actions taken by Suncorp Bank prior to 1 August 2024 where relevant to actions taken after this date. 2. Suppliers exclusive to Suncorp Bank’s own operations and processes under its Operational Resilience Policy. 3. Utilising KPMG’s ‘Typologies and Indicators of Modern Slavery’ (March 2022), developed in conjunction with the Australian Banking Association, available at ausbanking.org.au/wp-content/uploads/2022/03/Typologies-and-Indicators-of-Modern-Slavery_2022.pdf

Suncorp Bank's Business Banking Relationship Managers play a role in identifying potential modern slavery indicators within their customer base, guided by Suncorp Bank's Credit Risk Policy Manual which embeds modern slavery risk management within business lending practices. Business lending applications collect the customer's primary business activity and/or ANZSIC code, which can help identify businesses at higher-risk of modern slavery. For customers with total business-related exposures above a specific threshold, Relationship Managers conduct annual reviews of customer business plans and financial statements, and, where appropriate, perform site visits. These reviews can assist in identifying risk indicators such as employment structures, average labour costs, and working conditions.

Financial crime

As part of its AML/CTF obligations, Suncorp Bank has upgraded transaction monitoring systems and processes to assist in identifying potential cases of modern slavery and related offences (e.g. labour exploitation, child sexual exploitation and sexual servitude). This includes:

- Implementation of dynamic algorithms based on customer transaction and electronic activity; and
- Additional due diligence via transaction monitoring alerts for customers in potential high-risk industries for modern slavery.

Where concerns of modern slavery are identified, either through activity-related alerts or through a Customer Risk Assessment (i.e. high/extreme industry score), the customer will be subject to Enhanced Customer Due Diligence (ECDD). This involves a customer profile analysis (which includes a view to confirming the customer's identification information, industry and source of wealth) and a transaction analysis (which includes a review to understand the purpose of the flagged activity and nature of the customer's account activity in general). Based on the ECDD findings, the investigator will determine whether the customer meets the relevant threshold for reporting to AUSTRAC.

People

Suncorp Bank recognises the role it plays in identifying, assessing and managing modern slavery within its workforce. Suncorp Bank has controls, systems and processes in place to seek to ensure that its workforce is engaged on a proper and lawful basis and that its workplaces are safe for its employees.

One way ANZ manages potential modern slavery risks across its business is by respecting the right to collective bargaining. In August 2025, Suncorp Bank employees voted in favour of the Suncorp Bank Enterprise Agreement 2025 (EA). The Fair Work Commission subsequently approved the Suncorp Bank EA, which came into effect on 21 October 2025. This outcome brings Suncorp Bank and ANZ employment conditions into closer alignment and is an important step towards becoming one bank. The approved EA can be accessed on the Fair Work Commission website.

Building awareness

All Suncorp Bank employees have access to modern slavery training modules via ANZ's online training platform, including those outlined on page 19.

Suncorp Bank maintains mandatory AML/CTF and sanctions training to recognise unusual behaviours/transactions associated with human rights and modern slavery and how to raise an unusual matter report if identified. These reports are investigated by Suncorp Bank's AML/CTF Operations team.

In 2025, Suncorp Bank implemented modern slavery awareness training in Business Banking customer-facing teams through a campaign which included information on higher-risk areas such as agriculture, aged care, and labour-hire. Training highlighted higher-risk customer sectors and shared insights from the Australian Federal Police and the New South Wales Anti-slavery Commissioner.

Training was also delivered to Suncorp Bank teams where their role is more directly exposed to potential human rights risks including modern slavery on obligations under the Australian Act. The training aimed to uplift awareness of modern slavery as a risk and how employees identify, manage and mitigate this risk.

Key actions from our 2025 program of work (Suncorp Bank) included:

Building awareness

- Implemented modern slavery awareness in customer-facing teams through a campaign which included information on high-risk areas such as agriculture, aged care, and labour-hire.

Policy and process

- Implemented a retrospective Supplier Categories Risk Grading to independently assess, identify, and manage supplier risk and explore further targeted oversight and mitigation actions of these suppliers, if deemed necessary.
- Upgraded AML/CTF transaction monitoring systems and processes to assist in identifying potential cases of modern slavery and related offences.

Due diligence

- Conducted a modern slavery risk assessment to reassess lending portfolio exposure to industries deemed high risk, such as construction and agriculture and the assessment was provided to the Business Banking team for awareness.

Monitoring effectiveness

Defining metrics that measure success in identifying, assessing and managing modern slavery risk is challenging. Meaningful engagement between business, law enforcement agencies and civil society is required to help define actions that are most effective at helping victims of modern slavery. We look at quantitative and qualitative measures to track our progress, inform improvements to our approach and measure our effectiveness across our modern slavery program of work.

Priority area	What we measure	2025 outcomes (2024 outcomes)
Building awareness through training and education	Number of people who have completed 'Modern Slavery – The Basics' online training module ¹	204 (2024: 190) ²
	Number of people who have completed social and environmental risk online training modules or webinars	1,086 ² (2024: 687) ²
	Percentage of sourcing employees in the Group Procurement team that undertake specialised training on modern slavery risks in the supply chain	97% ³
	My Voice Speak Up Index: employees feel confident to speak up at ANZ	80% ⁴ (2024: 81%) ⁵
Governance, policy and process	Modern Slavery Working Group workstreams meet to discuss developments and track progress on action plans	The Supply Chain and Customer workstreams met at least six times, and the Investment workstream met four times.
	Updates to contractual documents undertaken upon renewal	SCOP clauses included in 83% of all live supplier contracts. ⁶
	Updates to frameworks and processes undertaken	Established a Modern Slavery Working Group in New Zealand. Developed an escalation process in New Zealand for employees to report concerns, complementing the existing Group process.
Undertaking due diligence	Number of suppliers screened as part of Group Procurement's ongoing supplier due diligence	4,099 ⁷ (2024: 5,311)
	Percentage of top 100 suppliers (by spend) screened	100% ⁸ (2024: 100%) ⁸
	Number of third party due diligence screenings undertaken via the Third Party Risk Management Hub	1,909 ⁸
	Number of customer social and environmental risk screenings undertaken	6,162 ² (2024: 6,305) ²

1. While the training modules are available to the whole ANZ workforce, they are most applicable to the relatively small number of our people whose role is more directly exposed to potential human rights risks, including modern slavery. Those individuals are involved in procurement, investment management and the relationship management of institutional customers as detailed in "Identifying, assessing and managing risks" on pages 13–14. **2.** Excludes Suncorp Bank. **3.** In 2025 training became mandatory for sourcing employees in Group Procurement. **4.** Results include employees and contingent workers. Data sourced from August 2025 Pulse survey. Includes Suncorp Bank. **5.** Results include employees and contingent workers. Data sourced from August 2024 Pulse survey. Excludes Suncorp Bank. **6.** Includes Suncorp Bank. **7.** Includes Suncorp Bank. The reduction in screenings during 2025 is due to a change in methodology and a reduced supplier base. Included Suncorp Bank from 31 July 2024 to 30 September 2024. **8.** Includes Suncorp Bank. New process implemented in FY25.

Appendix 1 – Mandatory criteria reference table

The table below provides reference pages for the relevant disclosures in each criterion for both the Australian Act and the UK Act.

Australian Commonwealth <i>Modern Slavery Act 2018</i> reporting criteria	United Kingdom <i>Modern Slavery Act 2015</i> requirements	Page reference
1. Identify the reporting entity	N/A	Pages 4-5
2. Describe the structure, operations and supply chains of the reporting entity	54(5)(a) the organisation's structure, its business and its supply chains	Pages 6-7
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	54(5)(d) the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	Pages 13-27
4. Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	54(5)(b) its policies in relation to slavery and human trafficking; (c) its due diligence processes in relation to slavery and human trafficking in its business and supply chains; and (f) the training about slavery and human trafficking available to its employees	Pages 8-11, 13-27
5. Describe how the reporting entity assesses the effectiveness of such actions	54(5)(e) its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Page 28
6. Describe the process of consultation with any entities that the reporting entity owns or controls. In the case of a reporting entity covered by a statement under section 14 – the entity giving the statement	N/A	Pages 4-5
7. Include any other information that the reporting entity, or the entity giving the statement, considers relevant	N/A	Pages 3 and 12

Glossary of terms

ANZ Bank Group

ANZ BH Pty Ltd and each of its subsidiaries, including ANZBGL.

ANZ Group

ANZGHL Group.

ANZ Non-Bank Group

ANZ NBH Pty Ltd and each of its subsidiaries, including the Group's beneficial interests in the 1835i trusts and non-controlling interests in the ANZ Worldline Payment Solutions joint venture, and ANZ Group Services Pty Ltd.

ANZBGL

Australia and New Zealand Banking Group Limited.

ANZBGL Group

ANZBGL and each of its subsidiaries.

ANZGHL

ANZ Group Holdings Limited.

ANZGHL Group

ANZGHL and each of its subsidiaries, including ANZ BH Pty Ltd, ANZ Group Services Pty Ltd and ANZ NBH Pty Ltd.

Board

ANZGHL Board of Directors.

Bribery

A form of corruption. There are two types of offences associated with bribery; active bribery refers to offering an advantage to influence decisions or breach trust, and passive bribery, referring to being the receiver of such advantage, and to have trust in entrusted power diminished or decisions unduly influenced.

This advantage may be financial, such as money or shares in a business, or non-financial, such as offering jobs to the receiver, or for their Related Parties.

An advantage may be offered, given or received by ANZ employees, management, customers, or third parties of ANZ. Some common forms of bribery are to:

- offer, give or receive gifts and entertainment, or illicit payments to provide or promise to provide contracts for products and services, access to credit, or any other service ANZ may offer under conditions that would not meet normal commercial business criteria;
- make political or charitable donations and grants that are designed to unfairly influence business decisions;
- benefit from undeclared ownership interests in third-party entities that, because of your influence, the ANZ resolved to do business with; and
- manipulate books and records to hide illicit benefits from scrutiny.

Contingent worker

A person engaged to provide services to ANZ under a contract of service.

A contingent worker is not paid via the ANZ payroll.

Corruption

The abuse of entrusted power for personal gain. Potential indicators of corruption could be an abuse of power by those in a position of authority or trust, collusive behaviour, where those in a position of authority or trust collude with others to achieve illicit benefits and gains, or deceptive behaviour, where colluding parties often take steps to hide their corrupt activities by not declaring important information or falsifying books and records.

Employee

Persons employed by ANZ and paid directly through ANZ payroll. They can be permanent (full time or part time), fixed term or casual.

Group ESG

A function (reporting to the Group Head Corporate Affairs) to monitor social and environmental impacts across industries, customers, and communities.

Large business customers

The customers of ANZ Institutional division where ANZ has a credit exposure.

Modern slavery

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

The Australian Commonwealth *Modern Slavery Act 2018* (Cth) defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

Operations

Activity undertaken by ANZ to pursue its business objectives and strategy in Australia or overseas including financial lending to customers.

Reporting entity

Entities that are required to report under the Australian Act or the UK Act.

Responsible Investment Framework

Responsible investment is a broad-based approach to investing which factors in people, society and the environment, along with financial performance, when making investment decisions.

Supplier Code of Practice

Outlines our minimum expectations for suppliers in relation to human rights, workplace relations, workplace health and safety, ethical business practices, information management and confidentiality, accessibility, environmental management and supplier diversity.

Supply chain

The products and services (including labour) that contribute to ANZ's own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

Third party

Any person, whether a natural person, an organisation or any other entity, with whom users engage commercially or contractually including actual and potential suppliers, service providers, vendors, joint venture partners, agents, intermediaries, consultants, distributors, business contacts, advisers, government and public bodies. Business partners such as members of joint ventures, mergers and acquisitions in which ANZ actively participates and does not hold a purely passive investment are also included in this definition.

Third party external managers

Fund managers appointed by ANZ New Zealand Investments Limited to manage some of the assets in the underlying funds. The current external fund managers can be found in the 'Underlying Funds and External Fund Managers' documents available at anz.co.nz/personal/investments/docs for ANZ Investment Funds and anz.co.nz/OA-documents for OneAnswer MultiAsset-Class Funds as well as on the offer register at disclose-register.companiesoffice.govt.nz

United Nations Guiding Principles on Business and Human Rights

The United Nations Guiding Principles on Business and Human Rights (UNGPs) are a set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations.

Independent Limited Assurance Report

to the Directors of ANZ Group Holdings Limited



Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the 2025 Modern Slavery and Human Trafficking Statement, has not been prepared by management of ANZ Group Holdings Limited, in all material respects, in accordance with the Criteria for the year ended 30 September 2025.

Information Subject to Assurance

ANZ Group Holdings Limited (ANZ) engaged KPMG to perform a limited assurance engagement for the year ended 30 September 2025. KPMG’s scope of work comprised:

Information subject to assurance	Level of assurance	Location	Criteria used as the Basis of Reporting (the “Criteria”)
2025 Modern Slavery and Human Trafficking Statement (Statement)	Limited	Pages 3-29	<ul style="list-style-type: none"> Section 16 of the Australian Commonwealth <i>Modern Slavery Act 2018 (Cth)</i> (Australian Act) Section 54 (5) of the United Kingdom <i>Modern Slavery Act 2015</i> (UK)

Basis for Conclusion

We conducted our work in accordance with Australian Standard on Assurance Engagements ASAE 3000 Assurance Engagements Other than Audits or Reviews of Historical Financial Information (ASAE 3000). We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

In accordance with ASAE 3000 we have:

- Used our professional judgement to plan and perform the engagement to obtain limited assurance that we are not aware of any material misstatements in the information subject to assurance, whether due to fraud or error;
- Considered relevant internal controls when designing our assurance procedures, however we do not express a conclusion on their effectiveness; and
- Ensured that the engagement team possess the appropriate knowledge, skills and professional competencies.

Summary of Procedures Performed

Our limited assurance conclusion is based on the evidence obtained from performing the following procedures:

- Enquiries with management to understand ANZ’s internal controls, governance structure and reporting process of the Statement;
- Interviews with relevant management and staff responsible for developing the content (text and data) within the Statement to understand the approach for monitoring, collecting and reporting;
- Comparing text and data (on a sample basis) to be presented in the Statement to underlying sources;
- Testing over monitoring effectiveness metrics through understanding the calculation methodology, walkthrough of the data extraction and reviewing that the calculation was completed accurately for the disclosed 2025 outcomes;

- Assessing alignment of the Statement against the Criteria;
- Assessing the completeness and accuracy of the reporting boundaries in the Statement; and
- Reviewing the Statement in its entirety to ensure it is consistent with our overall knowledge of assurance engagement.



Inherent Limitations

Inherent limitations exist in all assurance engagements due to the selective testing of the information being examined. It is therefore possible that fraud, error or material misstatement in the information subject to assurance may occur and not be detected. Non-financial data may be subject to more inherent limitations than financial data, given both its nature and the methods used for determining, calculating, and estimating such data. The precision of different measurement techniques may also vary. The absence of a significant body of established practice on which to draw to evaluate and measure non-financial information allows for different, but acceptable, evaluation and measurement techniques that can affect comparability between entities and over time.

The procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Accordingly, we do not express a reasonable assurance conclusion.

Misstatements, including omissions, are considered material if, individually or in the aggregate, they could reasonably be expected to influence relevant decisions of the Directors of ANZ.

Use of this Assurance Report

This report has been prepared solely for the Directors of ANZ who have voluntarily commissioned this independent assurance over the information subject to assurance to enhance transparency and confidence in their oversight. This report may not be suitable for another purpose. We disclaim any assumption of responsibility for any reliance on this report, to any person other than the Directors of ANZ, or for any other purpose than that for which it was prepared.

Management’s Responsibility

Management are responsible for:

- Appropriate reporting topics and selecting or establishing suitable criteria for measuring, evaluating and preparing the information subject to assurance;
- Preparing and presenting the information subject to assurance in accordance with the Criteria;
- Ensuring that those criteria are relevant and appropriate to ANZ and the intended users; and
- Establishing and maintaining systems, processes and internal controls that enable the preparation and presentation of the information subject to assurance that is free from material misstatement, whether due to fraud or error.

Our Responsibility

Our responsibility is to perform a limited assurance engagement in relation to the information subject to assurance for the year ended 30 September 2025, and to issue an assurance report that includes our conclusion based on the procedures we have performed and evidence we have obtained.

Our Independence and Quality Management

We have complied with our independence and other relevant ethical requirements of the *Code of Ethics for Professional Accountants (including Independence Standards)* issued by the Accounting Professional and Ethical Standards Board and complied with the applicable requirements of Australian Standard on Quality Management 1 to design, implement and operate a system of quality management.

KPMG

Sarah Newman
Partner

Melbourne
26 March 2026

KPMG

Maria Trinci
Partner

Melbourne
26 March 2026

