



Public Policy Advocacy, Political Donations and Foreign Influence Policy

Why does ANZ have this policy?

This statement summarises ANZ policies to ensure that our approach to public policy and political support is open and transparent.

ANZ participates ethically, openly and responsibly in the public policy development and decision-making process. We seek to represent the best interests of our shareholders, and acknowledge and respond to the legitimate interests of our people, customers, the communities we serve and the environment in which we operate.

ANZ recognises that it has a role to play in supporting democracy. However, political donations and involvement in political fundraising activities can lead to perceptions of cash for access or favours.

ANZ also recognises that any representations made to policy makers to influence political or policy decisions on behalf of foreign-controlled entities may damage ANZ's reputation or have serious legal consequences.

How does this policy apply at ANZ?

This policy applies to all ANZ employees, contingent workers and directors of Australia and New Zealand Banking Group Limited and its controlled entities. Breaches of this policy may lead to disciplinary action, including dismissal.

Key obligations

ANZ contributes to public policy development by:

- identifying, analysing and developing public policy positions and strategies on issues of significance to ANZ and the communities in which we operate
- engaging in dialogue with elected representatives, government and regulatory officials and interest groups such as consumer, employee, community and environmental organisations
- working collaboratively and transparently as members of associations that have similar interests and approaches to ours; and where further opportunities for dialogue and engagement are provided.*

In relation to political donations:

- ANZ attends and participates in paid events, including business forums, hosted by the major Australian Federal political parties.
- ANZ will disclose associated costs through the Australian Electoral Commission's donors annual return process.

In relation to foreign influence:

- ANZ employees and contingent workers will not lobby, communicate or undertake related activities on behalf of foreign governments or their controlled entities. To avoid doubt, this policy does not affect the provision of banking services to foreign government or their controlled entities, nor does it affect representations ANZ makes on its own behalf.

Role of Communications and Public Affairs

Communications and Public Affairs will:

- promote compliance with this policy across ANZ
- arrange public disclosure of political donations to the Australian Electoral Commission
- monitor and manage compliance and approvals.

* Examples of industry associations of which ANZ is a member are disclosed in ANZ's annual reporting.

Last review: October 2021

Reviewed annually by: Communications and Public Affairs