



Anti-Fraud Policy Summary

Why it matters

It is important that ANZ minimises the harm caused by fraud to our customers, shareholders and employees, and to the wider community.

Fraud is deliberately deceptive conduct, intending to obtain a benefit or advantage for oneself or for a third party or for ANZ. Fraud may be committed against ANZ or the accounts of its customers.

This policy sets out ANZ's approach to proactively minimise the occurrence of fraud, including scams, and its consequences to our customers, shareholders, employees and contingent workers, and to meet legal and regulatory requirements.

It is one of the global policies supporting ANZ's Code of Conduct.

When it applies

This policy applies to all employees and contractors of Australia and New Zealand Banking Group Limited (ANZ BGL) and its controlled entities (excluding Suncorp Bank which has its own Anti-Fraud Policy), in preventing, detecting, responding to and reporting fraud.

Responsibilities & what needs to be done

ANZ will:

- determine and manage its appetite for fraud risk
- identify, assess, document and comply with fraud-related obligations
- identify, assess, document and escalate fraud risks
- develop and maintain anti-fraud controls
- demonstrate a proactive approach to fraud risk management to protect its customers, shareholders and employees against the risks of fraud
- continue to develop and implement preventative and detective systems, and anti-fraud controls
- investigate all suspected and actual fraud incidents in line with defined thresholds and protocols
- report internally, and as required to regulatory and/or law enforcement bodies, all suspected and confirmed instances of fraud above agreed thresholds in accordance with defined reporting requirements and local and industry requirements

Under this policy, employees and contingent workers will:

- act in accordance with ANZ values and Code of Conduct
- never engage, or attempt to engage, in fraud
- never attempt to bypass anti-fraud controls, and immediately report any request to do so

- understand internal and external fraud risks and be alert to any fraudulent activity
- know and comply with applicable anti-fraud standards and procedures
- complete all required fraud awareness training

Last review: January 2025