



## **Whistleblower Protection Policy Summary**

### **Why does ANZ have this policy?**

ANZ encourages openness, integrity and accountability. The purpose of this policy is to provide everyone working at ANZ with the means to raise concerns, freely and without fear of repercussions, regarding actual or suspected reportable conduct - conduct that is dishonest, fraudulent, corrupt, illegal, in breach of local laws, unethical, an unsafe work practice or a repeated breach of ANZ policy or administrative procedures.

This is one of the global policies supporting ANZ's Code of Conduct and Ethics.

### **How does this policy apply at ANZ?**

This policy applies to all employees, contractors and directors of Australia and New Zealand Banking Group Limited and its controlled entities.

This policy directs the provision of mechanisms to make information available, allow confidential disclosures to be made and investigated, and ensure appropriate action is taken. This includes:

- the appointment of Whistleblower Champions, who provide information to those working at ANZ about the policy, where to find more information, and whom to contact should they need to make a disclosure
- the appointment of two Global Whistleblower Protection Officers (Group General Manager Internal Audit and General Counsel & General Manager Compliance, International & Institutional Banking) and two Alternate Global Whistleblower Protection Officers (Head of Group Investigations and Chairman of the Audit Committee)
- the provision of phone, email and web-based channels for disclosure, operated by a third party and including multi-lingual capability
- the provision of an escalation avenue to the Chairman of the Audit Committee, where a whistleblower has concerns about the resolution or the conduct of investigations of disclosures under the policy.

All investigations undertaken under this policy will be conducted in accordance with the principles of fairness and natural justice. Investigations will be timely, conducted impartially and comprehensively documented.

The implementation of this policy is supported by global procedures, and all employees and contractors complete mandatory training, repeated every year. Breaches of this policy may lead to disciplinary action, including dismissal.

### **Key obligations**

Under this policy those working at ANZ will:

- make reports in good faith - acting honestly, ethically and in the best interest of ANZ
- not disadvantage or victimise another person who makes a report.

### **Role of Group Investigations**

Group Investigations is responsible for implementing the policy, including:

- ensuring up-to-date information is available to all those working at ANZ
- managing the provision of disclosure channels by a third party
- reporting de-identified information about the number and type of disclosures under the policy to Audit Committee and the Operational Risk Executive Committee every six months.

Last reviewed: May 2013

Reviewed annually by: Group Risk