2025 ESG Report



Approved for distribution by ANZ Group Holding Limited's Board.

Our ambition is for ANZ to unlock our potential to win the preference of customers, shareholders and the community.

Our ESG approach is focused on responding to our seven most material ESG issues:

- Environmental sustainability
- Ethics, conduct and culture
- Financial wellbeing
- Housing
- Information technology
- Responsible customer engagement
- Improving non-financial risk management

We are continually seeking to improve our reporting suite and welcome feedback on our ESG and climate 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-Rangi
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.



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Our 2025 reporting suite

Where to find	Annual Report	Full Year Results announce-ments	Corporate Governance Statement	Climate Report	ESG Report	ESG Data and Frameworks Pack	Modern Slavery and Human Trafficking Statement	Voluntary Tax Transparency Report
Financial	●	●						●
Governance	●		●	●	●		●	●
Strategy	●			●	●			
Risk	●			●	●	●	●	
ESG disclosures and performance	●		●		●	●	●	
Climate disclosures and performance	●			●	●	●		

About this report

Our 2025 ESG Report provides stakeholders with detailed information on ANZ's ESG performance and challenges. This report covers ANZ Group Holdings Limited (ANZGHL) ABN 16 659 510 791 and its subsidiaries', referred to as "ANZ" or "the Group" or "our" or "we".

ANZ has prepared this report in accordance with the GRI Universal Standards 2021. A GRI Content Index is provided in our 2025 ESG Data and Frameworks Pack available at **anz.com/esgreport**.

In 2019 we were a founding signatory to the United Nations Principles for Responsible Banking. We have reported our Responsible Banking Progress Statement in our 2025 ESG Data and Frameworks Pack available at **anz.com/esgreport**.

KPMG has performed assurance over the disclosures in this report. A copy of KPMG's limited assurance conclusion can be found on pages 58-59.

Reporting boundaries and periods

This report covers ANZ's operations over which, unless otherwise stated, we have control for the financial year commencing on 1 October 2024 and ending 30 September 2025, referred to as "2025" throughout the report, unless otherwise stated. Where data is still maturing and may only be for a part of our operations, the data boundary will be noted.

The processes, approaches and policies described in this report may vary in application across ANZ's operations, for example, to reflect specific legal requirements of the jurisdictions in which ANZ operates.

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 report, this is denoted, noting Suncorp Bank is excluded from prior year metrics, unless otherwise stated.

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

The following ANZ policies, which embed our approach to ESG, 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
- Code of Conduct
- Diversity and Inclusion Policy
- Equal Opportunity, Bullying and Harassment Policy
- Information Security Policy
- Non-Financial Risk Policy
- Performance and Remuneration Policy – Group[1]
- Procurement Policy
- Third-Party Risk Management Framework
- Supplier Code of Practice
- Wellbeing and Safety Policy
- Whistleblower Policy

During the reporting year Suncorp Bank retained the following policies:

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

Reading this report

Words underlined like 'this' are explained in the Glossary of terms on pages 56-57. Monetary amounts in this document are reported in Australian dollars (AUD), unless otherwise stated. Throughout this report, the sum of parts within charts and commentary may not equal totals due to rounding.

1. The Suncorp Bank Performance and Remuneration Policy forms part of, and should be read in conjunction with, the ANZ Group Performance and Remuneration Policy.

Disclaimer and important notices

The material in this report contains general background information about the Group's activities current as at 7 November 2025. It is information given in summary form and does not purport to be complete. It has a sustainability focus and does not reflect the totality of the Group's business activities. For a more complete overview of the Group's business, see the 2025 Annual Report available at **anz.com/annualreport**.

It is not intended to be and should not be relied upon as advice to investors or potential investors, and does not take into account the investment objectives, financial situation or needs of any particular investor. These should be considered, with or without professional advice, when deciding if an investment is appropriate.

Forward-looking statements

This report may contain forward-looking statements or opinions including statements regarding our intent, belief or current expectations with respect to the Group's business operations, market conditions, results of operations and financial condition, sustainability objectives or targets, and risk management practices. Those matters are subject to risks and uncertainties that could cause the actual results and financial position of the Group to differ materially from the information presented herein. When used in the report, the words 'forecast', 'estimate', 'goal', 'target', 'indicator', 'plan', 'pathway', 'ambition', 'modelling', 'project', 'intend', 'anticipate', 'believe', 'expect', 'may', 'probability', 'risk', 'will', 'seek', 'would', 'could', 'should' and similar expressions, as they relate to the Group and its management, are intended to identify forward-looking statements or opinions.

Those statements are usually predictive in character; or may be affected by inaccurate assumptions or unknown risks and uncertainties or may differ materially from results ultimately achieved. As such, these statements should not be relied upon when making investment decisions. There can be no assurance that actual outcomes will not differ materially from any forward-looking statements or opinions contained herein.

Also see the notice about climate-related information on this page which may affect climate-related forward-looking statements or opinions.

The forward-looking statements or opinions only speak as at 7 November 2025 and no representation is made as to their correctness on or after this date. No member of the Group undertakes to publicly release the result of any revisions to these statements to reflect events or circumstances after this date to reflect the occurrence of unanticipated events.

Climate-related information

This report may contain climate-related statements, including in relation to climate-related risks and opportunities, climate-related goals and ambitions, emissions reduction pathways and climate projections. While the statements were prepared in good faith, climate-related statements are subject to significant uncertainty, challenges and risks that may affect their usefulness, accuracy and completeness, including:

1. *Availability and reliability of data* – emissions and climate-related data may be incomplete, inconsistent, unreliable or unavailable (including information from the Group's customers), and it may be necessary to rely on assumptions, estimates or proxies where that is the case.
2. *Uncertain methodologies and modelling* methodologies, frameworks and standards used for calculations of climate-related metrics, modelling and climate data are not universally applied, are rapidly evolving and subject to change. This may impact the data modelling, approaches, and targets used in preparation of this report.
3. *Complexity of calculations and estimates* – estimating financed or facilitated emissions (including allocating emissions to banking activities) and emissions reduction is complex and relies on assumptions and judgments, often made in respect of long periods of time.
4. *Changes to climate-related governing frameworks* – changes to climate-related policy, laws, regulations and market practices, standards and developments, including those resulting from legal proceedings and regulatory investigations.
5. *Lack of consistency in definitions and climate-science terminology subject to changes* – definitions and standards for climate-related data and assessment frameworks used across industries and jurisdictions may vary, and terminology and concepts relating to climate science and decarbonisation pathways may evolve and change over time. These inconsistencies and changes can also make comparisons between different organisations' climate targets and achievements difficult or inappropriate.
6. *Reliance on third parties for data or involvement* – the Group may need to rely on assistance, data or other information from external data and methodology providers or other third parties, which may also be subject to change and uncertainty. Additionally, action and continuing participation of third parties, such as stakeholders, may be required (including financial institutions and governmental and non-governmental organisations).

Due to these uncertainties, challenges and risks, statements, assumptions, judgments, calculations, estimates or proxies made or used by the Group may turn out to be incorrect, inaccurate or incomplete. Readers should conduct their own independent analysis and not rely on the information for investment decision-making.



The information in this notice should be read with the qualifications, limitations and guidance included throughout this report and in:

Appendix 5 ANZ Financed and Facilitated Emissions Methodology included in the 2025 Climate Report available at **anz.com/esgreport**

Appendix 7 Scope 1, Scope 2 and Scope 3 Operational Greenhouse Gas Emissions Reporting Methodology included in the 2025 Climate Report available at **anz.com/esgreport**

ANZ Social and Environmental Sustainability Target Methodology available at **anz.com/esgreport**

2025 ESG Data and Frameworks Pack available at **anz.com/esgreport**



CEO's message

Nuno Matos
Chief Executive Officer

This ESG Report sets out our performance against a range of ESG risks and opportunities where we have the greatest impact as a financial institution.

Across our communities in Australia and New Zealand, access to affordable housing and cost of living continue to be a key focus. Pleasingly, we have funded and facilitated more than $892 million this year against our target of delivering $10 billion of more affordable, accessible and sustainable homes to buy and rent by the end of 2030. We have also continued to deliver our financial education programs – MoneyMinded, MoneyBusiness and Saver Plus – reaching more than 126,000 participants this year.

Our Climate and Environment Strategy sets out our objective to be a trusted partner for our customers, supporting them to adapt and become more resilient to a changing environment and economy. We continue to make progress against our climate and environment targets, including funding and facilitating more than $84 billion towards our $100 billion target in social and environmental activities by 2030. This is discussed in more detail in our 2025 Climate Report.

Our teams are continuing to work hard to put our customers first by keeping their money safe, reviewing and adjusting our capabilities to manage the security of customer information, and helping to detect and prevent scams - something we know is of the utmost importance.

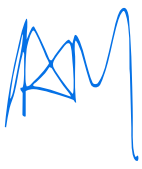
By improving our customer propositions, we also seek to support inclusion and economic self-determination through our First Nations Strategy in Australia and our Tākiri-ā-Rangi Te Ao Māori Strategy in New Zealand.

A key area of focus is improving our management of non-financial risk to improve customer outcomes. We acknowledge our existing non-financial risk management practices have not met expectations and recognise we have more work to do to uplift our management of non-financial risk and to improve risk culture across the bank.

Importantly, in October 2025 we also launched our refreshed strategy, ANZ 2030, based on our ambition to unlock our potential to win the preference of customers, shareholders and the community. You can learn more about ANZ 2030 in our 2025 Annual Report.

A cultural reset is fundamental to fulfilling these responsibilities and meeting the expectations of regulators, communities and other stakeholders. A key element of this change is a keen focus on simplifying the bank to deliver for our customers and improving our risk management. I believe we will be a better bank with an energised and engaged workforce to enable the delivery of market-leading services to our customers that our teams can be proud of.

Delivering long-term value to our shareholders and meeting the evolving needs of our customers requires continuous improvement and purposeful action. Effective management of ESG risks and opportunities enhances our ability to serve customers responsibly, strengthens governance, reduces risk and supports more sustainable financial outcomes for our shareholders.



Nuno Matos
Chief Executive Officer

Our strategy is focused on four strategic pillars:

ANZ 2030



Customer first

With market leading, differentiated and superior propositions, we will raise the standard of every digital and human interaction for our customers.



Simplicity

To set the market standard for productivity, we will deliver organisational simplification, divest non-core assets and improve efficiency.



Resilience

Leading the industry in trust, safety and risk management, we will adhere to the highest standards of non-financial risk management and strengthen end-to-end accountability across the bank.



Delivering value

To sustainably improve our financial performance, we will create lasting value by delivering higher returning growth and results that matter for our stakeholders.

About our business

ANZ provides banking and financial products and services to more than 11 million customers[1] across 29 markets.

Our business model

1

Australia Retail

Banking products and services provided to Australian consumers including home loans, deposits, credit cards and personal loans.

2

Australia Commercial

Banking products and services provided to small-to-medium enterprises, large commercial customers and high-net-worth individuals and family groups in Australia.

3

Institutional

Services to institutional and corporate clients, including governments, via Transaction Banking, Corporate Finance, and Markets business units.

4

Suncorp Bank

Banking and related services to retail, commercial, small and medium enterprises and agribusiness customers in Australia.

5

New Zealand

Banking products and services provided to New Zealand customers through Personal, Business and Agribusiness units.

6

Pacific

Banking products and services provided to retail and commercial customers, and to governments located in the Pacific region.

7

Group Centre

Supporting functions including technology, property, risk management, financial management, treasury, human resources, corporate affairs, and shareholder functions. It also includes minority investments in Asia and interests in the ANZ Non-Bank Group.

1. Includes Suncorp Bank.

Governance

Our governance framework seeks to provide a structure for effective and responsible decision making at ANZ.

ANZ Board and committees

ANZ Group Holdings Limited's 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 for effective and responsible decision making, assisting ANZ to deliver 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**

Board skills and experience

The Board has the collective skills, capabilities and experience needed to allow the Board to perform its role and discharge its responsibilities. The 2025 Corporate Governance Statement (refer to **anz.com/corporategovernance**) details the categories that the Board considers relevant to assessing the collective skills and experience of the Board and is what the Board is looking for in its own composition. One of the categories is sustainability, including climate.

Our ESG governance framework is evolving with our ESG approach and the expectations of our stakeholders. This year, the following changes have occurred relating to committees with oversight of our ESG approach and climate risks and opportunities:

- The Board Ethics, Environment, Social and Governance (EESG) Committee was discontinued and its responsibilities reallocated, as appropriate, to the Board and its sub-committees.
- The management Ethics and Responsible Business Committee (ERBC) was discontinued and where appropriate, matters previously considered by the ERBC are referred to the Executive Committee (ExCo).[1]
- A new and more focused management Climate and Environment Committee (CEC) was established in March 2025 reporting to ExCo.

Board of Directors

Principal Board committees

- **Audit Committee**
- **Risk Committee**
- **People and Culture Committee**
- **Digital Business and Technology Committee**
- **Nomination and Board Operations Committee**

1. Executive Committee (ExCo) comprises ANZ's most senior executives. The members of ExCo are available on ANZ's website at **anz.com/exco**.

The Board and management committee structure below outlines relevant committees that have oversight of ESG risks and opportunities across the Group. It reflects changes to our ESG governance structure this year with the Board committee changes effective from 5 September 2025.

ANZ Group Holdings Limited Board

Board committees

Audit Committee
Oversees financial reporting principles and policies, controls and procedures.

Risk Committee
Oversees the implementation and operation of the Group's Risk Management Framework, including climate risk. Responsible for endorsing the Risk Appetite Statement.

People and Culture Committee
Oversees the effective operation of the Performance and Remuneration Framework, and other Talent and Culture matters.

Digital Business and Technology Committee
Oversees the Group's digital transformation, data, technology-related innovation and information/cyber security strategies.

Nomination and Board Operations Committee
Oversees matters to do with the proper functioning of the Board, including in relation to ongoing composition and overall Board operations.

Key management committees

Credit and Market Risk Committee
Primary Group management forum responsible for the oversight and control of credit, market and other material financial risks across the Group.

Chaired by the Chief Risk Officer.

Executive Committee
Comprises ANZ's most senior executives. A delegations of authority framework outlines those matters delegated to the Chief Executive Officer (CEO) and other members of senior management.

Chaired by the CEO.

Climate and Environment Committee
A decision-making committee that is responsible for the execution of our Climate and Environment Strategy. This includes past, current and emerging climate and environment risks and opportunities and climate and environment targets.

Chaired by the Group Executive, Institutional.

(Established March 2025)

Operational Risk Executive Committee
The primary senior executive management forum responsible for overseeing non-financial risks, expected and unexpected risk profile and the related control environment across the Group.

Chaired by the Chief Risk Officer.

Other management committees and forums

Climate and Environment Forum
Responsible for overseeing delivery of our C&E Strategy, and provides recommendations and escalations to the CEC, Board and other management committees.

(Established February 2025)

Climate Disclosure Program Steering Committee
Responsible for overseeing delivery of the Group-wide Climate Disclosure Program to meet Australian mandatory climate-related disclosure requirements.

(Established October 2024)

Support activities

Alongside climate-focused committees, during 2025 the Executive Committee is supported by the Group ESG function (reporting to the Group Head Corporate Affairs) to monitor social and environmental impacts across industries, customers, and communities. Key activities include:

- Managing ESG risks and opportunities through senior executive decision-making processes.
- Advising on social and environmental issues influencing lending decisions, including public policy, regulation, and community expectations.
- Delivering financial education programs (Saver Plus, MoneyMinded, MoneyBusiness) and overseeing employee volunteering and community investment initiatives.
- Providing guidance on ESG and climate disclosures, including emerging reporting standards and frameworks.

Support is also provided by other teams on matters including supporting customers in need of extra care, First Nations Strategy and Tākiri-Ā-Rangi Te Ao Māori Strategy, health and safety, and diversity and inclusion.

ESG focus areas of Board management and committees

During 2025, we engaged on a range of ESG topics with our Board, senior executives, regulators, government and non-government organisations. This provides opportunities to build knowledge, including about our most material ESG issues discussed on pages 10-11 and listed below.

Board EESG Committee and Management ERBC

This year, the Board EESG[1] Committee and management ERBC[2] considered topics, including:

- Modern slavery and human rights
- Accessibility
- Whistleblower Program
- ESG external operating environment
- Climate and Environment Strategy
- Climate-related targets including sectoral pathways
- Preparation for mandatory climate-related disclosures in Australia
- Customer engagement on climate and nature, including our Large Emitters Engagement Program

For more information on climate risk governance, refer to the 2025 Climate Report available at **anz.com/esgreport**

Governance over ESG targets

The setting of ESG targets is reviewed by ExCo and approved by the Board. Targets are also monitored by ExCo and the Board. For more information on governance over climate-related targets, including sectoral pathways, see page 7 of our 2025 Climate Report available at **anz.com/esgreport**.

Executive remuneration

ANZ's Remuneration Report within our 2025 Annual Report, available at **anz.com/annualreport**, details how performance and remuneration outcomes are determined for our most senior leaders.

The CEO's Short Term Variable Remuneration (STVR) is assessed against the ANZ Group Scorecard, adjusted by the 'How' Modifier, which takes into consideration the CEO's leadership of ANZ's values and behaviours and ANZ's risk and compliance standards.

Performance objectives are set for Disclosed Executives through Divisional Scorecards, aligned with the ANZ Group Scorecard. For Disclosed Executives, STVR is assessed on 'What' assessment (ANZ Group Scorecard and Divisional Scorecard) x 'How' Modifier. The weighting to Divisional Scorecards varies from 50% to 75% for Disclosed Executives.

ANZ's Group Scorecard includes relevant objectives and key performance indicators (KPIs). For example, the 2025 Group Scorecard includes delivery against Environmental, Social and Governance (ESG) objectives and KPIs, such as:

> **Strengthen our reputation;** enhancing our employee value proposition and our social license to operate:
>
> - Improved Inclusion Index
> - Deliver environmental ESG targets as planned[3]

Divisional Scorecards also include objectives and KPIs as relevant to the particular business. Group/Divisional Scorecards are not designed to capture all of our ESG targets – however our senior leaders are accountable for ensuring we focus on and seek to adhere to our commitments and policies.

1. The Board EESG Committee had its last meeting in May 2025. **2.** ERBC was discontinued in July 2025. **3.** These are a subset of ANZ's ESG targets. Targets that contribute to ANZ's Group Scorecard are set out on page 13.

What matters most to our stakeholders

This year, we have conducted a materiality assessment where we engage with internal and external stakeholders to seek to identify and assess our most material ESG issues. The results help inform our business practices, ESG targets and key topics in our external ESG reporting.

Our most material ESG issues

ANZ's most material ESG issues are largely consistent with our 2024 assessment, with the addition this year of improving non-financial risk management.

Environmental sustainability remains one of the highest priority issues identified by our stakeholders, in terms of both risks and opportunities.

Ethics, conduct and culture remains top of mind for stakeholders, particularly the importance of trust.

Financial wellbeing, for customers and the broader community, was noted as integral to the role of a bank.

Housing was identified by many of our stakeholders as a long-term issue of profound impact.

Information security, encompassing cyber security and financial crime, was raised by many, including the potential for cyber threats to cause reputational damage, and the rapidly evolving and sophisticated nature of scams.

Responsible customer engagement, such as the need for ANZ to support customers, including those experiencing financial hardship.

Improving non-financial risk management was highlighted in response to the court enforceable undertaking from the Australian Prudential Regulation Authority (APRA) and resolution agreement with the Australian Securities and Investments Commission (ASIC). For more information on these matters see pages 16-17.

01. Identifying

02. Prioritising

03. Validating

04. Disclosing

A list of ESG topics for stakeholder feedback was prepared drawing from investor priorities, themes from leading ESG researchers, sustainability reporting standards (e.g. Sustainability Accounting Standards Board (SASB)), media analysis, industry research, peer reviews and our operating environment.

External and internal views were sought to prioritise and validate issues through stakeholder surveys in Australia, New Zealand and the Pacific, and through interviews with institutional investors, consumer and environmental non-government organisations, community partners, customers and employees.

Our approach asked stakeholders to consider in what areas ANZ has the most impact (positive and negative) on the economy, environment and people (including their human rights), as well as the impact these issues may have on the Group's ability to create value through its financial or operating performance.

We asked stakeholders to consider what impacts may be actual or potential, short-term or long-term, intended or unintended, and reversible or irreversible. Stakeholders used significant judgement when identifying ESG issues and in assessing their impacts.

Our assessment process involved using the quantitative survey data to guide the ranking and consolidating of topics. This was overlayed with qualitative feedback from stakeholder surveys and interviews, and discussions with ANZ senior executives and the Board to validate and approve the ESG issues considered the most material.

Our assessment approach is in accordance with the GRI Standard G3: Material Topics 2021 and considers the SASB Conceptual Framework 2017. A GRI Content Index is provided in our 2025 ESG Data and Frameworks Pack available at anz.com/esgreport.

Our most material ESG issues (not ranked)

Material issue		Description of issue[1]	Location of disclosure
	Environmental sustainability	Climate change and the energy transition, nature including biodiversity, circular economy, and ANZ's own emissions	2025 Climate Report available at **anz.com/esgreport** 2025 ESG Report, pages 27-29
	Ethics, conduct and culture	Corporate values, conduct and culture, and corporate governance	2025 ESG Report, pages 18-19
	Financial wellbeing	Customer and community financial wellbeing	2025 ESG Report, pages 30-31
	Housing	Housing access, affordability and sustainability	2025 ESG Report, pages 32-33
	Information security	Financial crime prevention (including fraud and scams), cyber security and data management (including privacy and security)	2025 ESG Report, pages 34-37
	Responsible customer engagement	Responsible marketing, sales and lending practices; fair, accessible and affordable products and services; customer support (e.g. hardship), experience and satisfaction	2025 ESG Report, pages 20-26
	Improving non-financial risk management	Financial system risk and resilience, regulatory compliance, anti-money laundering (AML), counter-terrorism financing (CTF), anti-bribery and anti-corruption (ABAC)	2025 ESG Report, pages 16-17, 38-41

Our foundational ESG issues (not ranked)

Our foundational ESG issues are topics that continue to be fundamental to our license to operate and are also included in this report.

Material issue		Description of issue[1]	Location of disclosure
	Digital banking experience	Digital innovation and emerging technology, including artificial intelligence	2025 ESG Report, page 42
	Diversity and inclusion	Diversity, equity and inclusion; Indigenous rights and cultural heritage (e.g. First Nations in Australia, *Tangata Whenua Aotearoa* and other Indigenous peoples)	2025 ESG Report, pages 43-48
	Employee experience	Workforce planning, attraction and retention, including remuneration; employee support (e.g. health, safety, wellbeing and engagement)	2025 ESG Report, pages 49-51
	Human rights	Human rights and modern slavery, supply chain management and procurement that is sustainable, responsible and diverse	2025 ESG Report, page 52
	Thriving communities	Community engagement, investment and contribution	2025 ESG Report, page 53

1. The survey included a more granular list of topics, which were then aggregated into the issues set out in this table. Sub-topics within an individual issue were not necessarily identified as 'material' in their own right.

Stakeholder engagement

One of the ways we help create long-term value and deliver on our business strategy is through a collaborative approach to building and maintaining relationships with stakeholders.

Our approach to stakeholder engagement aims to provide direct access for stakeholders, allowing us to respond to issues and consider stakeholder concerns when making decisions.

Outlined below are the material topics raised by our stakeholders throughout the year.

Our stakeholders	How we engage	Material topics identified through our engagement[1]
Customers	We engage with customers via our branch network, home loan specialists, contact centres, private bankers, relationship managers and digital channels.	• Access to capital and lending services for businesses • Conduct and ethical culture • Cost of living • Customer protection from fraud and scams • Financial inclusion, including financial education programs • Financial performance and shareholder returns • Implementation of the revised Banking Code of Practice • Integration of Suncorp Bank • Macroeconomic, geopolitical and localised issues impacting customers, including impact of tariffs • New business strategy and organisational change • Regional and rural banking access • Regulatory engagement and compliance, including ASIC and APRA matters • Remuneration and reward • Support for customers experiencing vulnerability • Supporting our customers' transition to net zero • Technology and artificial intelligence
Employees	Our employee engagement surveys and employee listening strategies are an opportunity for employees to provide feedback and insights on our behaviours, values and culture; and their experience working at ANZ.	
Government	We listen to, and seek to engage with, Ministers from state and national government, and public officials, including through participation in government consultations and parliamentary inquiries.	
Industry associations[2] and bodies	We are members of a number of industry associations and bodies. Through these memberships we contribute to discussions and submissions on industry-wide economic, social and environmental issues affecting our customers, shareholders and the broader community.	
Non-government organisations	We engage with non-government organisations (NGOs) through relationships that benefit our customers, stakeholders and the broader community. This enables us to understand perspectives from external stakeholders and build our knowledge.	
Regulators	ANZ has relationships with more than 800 regulatory bodies globally. These bodies play an important role in enabling financial stability, protecting consumers, preventing fraud and maintaining trust in the financial system. ANZ is committed to dealing with regulatory bodies in an open, constructive and cooperative way. Our engagement with regulators includes meetings, correspondence, breach notifications, regulatory enforcement matters, requests for information, and reviews or inspections.	
Shareholders	We provide shareholders with information in a timely manner through our reporting suite, announcements and briefings to the market, Annual General Meeting, shareholder communications and a dedicated shareholder website.	

1. This list is not exhaustive or exclusive to one stakeholder group. **2.** Key memberships include the Australian Banking Association, the Business Council of Australia, the New Zealand Banking Association, and Business New Zealand. Our key membership payments are included in the 2025 ESG Data and Frameworks Pack available at **anz.com/esgreport**.

Our ESG targets and performance

Our ESG targets support the delivery of our business practices, strategy and purpose. This year, four of our ESG targets concluded and three were achieved. For our operational emissions target, we achieved four of the five sub-targets. Related targets are summarised below.

Concluding targets

Target[1] headline	End date and outcome	Further details
Savings program pilots	2025 **Achieved**	2025 ESG Report, pages 14, 31, 42
Large Emitters Engagement Program (LEEP)[2]	2025 **Achieved**	2025 ESG Report, page 14 2025 Climate Report, pages 12-15
Operational emissions and non-emissions[2]	2025, 2030	2025 ESG Report, page 14
• Scope 1 and Scope 2 emissions	**Achieved**	2025 Climate Report, pages 52-53
• Renewable electricity	**Not achieved**	
• Water	**Achieved**	
• Waste	**Achieved**	
• Paper	**Achieved**	
New Zealand retail lending[2]	2025 **Achieved**	2025 ESG Report, pages 14, 33 2025 Climate Report, page 17
Gender equity targets[3,4]	2025	2025 ESG Report, pages 14, 45
• Key Management Personnel	**Not achieved**	2025 Corporate Goverance Statement, page 22
• Women in Leadership	**Achieved**	
We have withdrawn our financial resilience target in 2025 after identifying anomalies in the calculation methodology.		

Continuing targets

Target[1] headline	End date and status	Further details
$10 billion social and affordable housing	2030 Continuing	2025 ESG Report, pages 15, 32-33
$100 billion social and environmental activites[2]	2030 Continuing	2025 ESG Report, pages 15, 29 2025 Climate Report, page 31
Sectoral pathways[4]	2030 Continuing	2025 ESG Report, page 15 2025 Climate Report, pages 32-51
Operational emissions[5]	2030 Rebaselined	2025 ESG Report, page 15
• Scope 1 and Scope 2 emissions		2025 Climate Report, pages 52-53
Gender equity targets[5]	2026	2025 ESG Report, pages 15
• Key Management Personnel	Continuing	2025 Corporate Governance Statement, page 22
• Women in Leadership	Rebaselined	

1. Targets exclude Suncorp Bank unless otherwise stated. **2.** Target contributes to ANZ's 2025 Group Scorecard (Deliver environmental ESG targets as planned). Refer to the Remuneration Report contained within the 2025 Annual Report available at **anz.com/annualreport**. **3.** Target contributes to ANZ's 2025 Group Scorecard (Improved inclusion index). Refer to the Remuneration Report contained within the 2025 Annual Report available at **anz.com/annualreport**. **4.** Our 2025 Climate Report available at **anz.com/esgreport** details important information about the scope of our sectoral pathways. Revised pathways and targets include customers of Suncorp Bank that meet our in-scope criteria for inclusion in our pathways. **5.** Includes Suncorp Bank.

Concluding targets, including outcomes and performance

Targets[1]	2025 outcomes and performance
Savings program pilots Pilot a savings program[2] for people on lower incomes in Fiji and Vanuatu by end 2025, with at least 80% of participants having demonstrated a savings habit[3] upon completion. (Pacific)	**Achieved** The savings program[2] pilots were successfully completed in Fiji and Vanuatu. Both pilots exceeded their targets, with 85% of participants in Fiji and 90% of participants in Vanuatu demonstrating a savings habit[3] upon completion. A third pilot commenced in Solomon Islands.
Large Emitters Engagement Program (LEEP) Enhance our management of climate risks and opportunities by intensifying our engagement with our largest emitting business customers. We will expect and encourage them to strengthen their low carbon transition plans, by focusing our engagement and raised expectations on our 100 largest emitting business customers with the aim that by end 2025, compared to their starting point more customers are assessed as being in a 'mature' phase of their low carbon transition plans.	**Achieved** 45 customers were assessed as being in a 'mature' phase of their low carbon transition plans, up from 42 in 2024.[4]
Operational emissions and non-emissions Reduce the direct impact of our business activities on the environment[5] by:	
→ Reducing combined Scope 1 and Scope 2 emissions 85% by 2025 and 90% by 2030 (against 2015 baseline);[6]	**Achieved** Our combined Scope 1 and Scope 2 emissions have decreased by 96% since 2015.
→ Being powered by the equivalent of 100% renewable electricity by 2025;[7]	**Not achieved** 97% of ANZ's electricity needs were from renewable sources, just falling short of our target of 100%. This was principally due to the absence of recognised schemes or renewable electricity infrastructure in Papua New Guinea and Pacific countries.
→ Reducing water consumption[8] by 40% by 2025 (against 2017 baseline);	**Achieved** Our water consumption has decreased by 61% since 2017.
→ Reducing waste to landfill[9] by 40% by 2025 (against 2017 baseline);	**Achieved** Our waste to landfill has decreased by 79% since 2017.
→ Reducing paper consumption (both office and ANZ originated customer paper use) by 70% by 2025 (against 2015 baseline).	**Achieved** Our paper consumption has decreased by 77% since 2015.
New Zealand retail lending Helping New Zealand homeowners improve the sustainability of their homes and/or reduce their transport emissions through discounted lending of at least NZ$825m in aggregate to at least 19,700 households by end 2025. (New Zealand)	**Achieved** Since October 2020 we have supported 23,397 households into healthier homes and NZ$938.86 million lending through: • Our Healthy Home Loan Package; • Our Good Energy Home Loan Top Up; • Interest-free Insulation Loans.[10]
Gender equity targets[11] Maintain representation of women as Key Management Personnel (KMP)[12] of at least 40%.	**Not achieved** As at 30 September 2025, women as KMP[12] has decreased from four out of ten, to three out of nine and is now below target at 33%. When the recently announced permanent Executive Committee[13] appointments of Stephen White, Pedro Rodeia, Christine Palmer and Donald Patra commence from October to December 2025, women as KMP will increase back to 40%.
Increase the representation of Women in Leadership (WIL) by 1.2 percentage points (ppt) from baseline of 39.0%.[14]	**Achieved** We have exceeded our WIL target this year by 0.3 ppt to 40.5% – an annual increase of 1.5 ppt.

1. Targets exclude Suncorp Bank unless otherwise stated. **2.** Saver Plus. **3.** Eight out of 10 months saving (as per Saver Plus program), measured by participant survey data. **4.** In 2024, 42 customers were assessed as 'Mature'. Between 2024 and 2025, four of our 100 largest emitting customers upgraded to 'Mature', and one customer who was assessed as 'Mature' in 2024 was removed from LEEP due to acquisition. In 2025, we expanded LEEP to additional customers subject to the Safeguard Mechanism, certain customers in our sectoral pathways and other large emitters. Within this expanded LEEP cohort, there are 77 customers assessed in the 'Mature' phase as at end 2025. For further detail, refer to page 12 in the 2025 Climate Report available at **anz.com/esgreport. 5.** Environmental reporting year is 1 July – 30 June, in line with the Australian regulatory reporting year. **6.** Using a market-based method for Scope 2 calculations. Refer to Appendix 7 Scope 1, Scope 2 and Scope 3 Operational Greenhouse Gas Emissions Reporting Methodology in the 2025 Climate Report available at **anz.com/esgreport**. **7.** Self-generated renewable electricity, direct procurement from offsite grid connected generators e.g. Power Purchase Agreement (PPA) and default delivered renewable electricity from the grid, supported by credible attributes in accordance with RE100 technical guidelines. **8.** Total potable water consumed from ANZ's global properties. From 2021 includes global water consumption values, 2018 – 2020 values represent water consumption in our Australian commercial offices (>10,000m2) excluding 347 Kent Street which was sold in the 2020 reporting year. **9.** Total waste to landfill generated from ANZ's global properties. From 2021 includes global waste consumption values, 2018 – 2020 values include Australia and New Zealand only. **10.** Product discontinued in July 2022. **11.** Includes Suncorp Bank. **12.** 'Senior Executive' means "KMP", which means Chief Executive Officer and Disclosed Executives as set out in the Remuneration Report contained within the 2025 Annual Report. **13.** Executive Committee (ExCo) comprises ANZ's most senior executives. The members of ExCo are available at **anz.com/exco**. **14.** FY24 Women in Leadership result of 38.8% excluded Suncorp Bank, whereas FY24 Women in Leadership baseline for FY25 Women in Leadership target is 39.0% including Suncorp Bank.

Targets continuing in 2026, including performance update, and new targets

In 2026 we will continue our $10 billion social and affordable housing target, $100 billion social and environmental activities target[1], and sectoral pathways and targets. Both the 2025 and 2030 combined Scope 1 and Scope 2 operational emissions reduction targets have now been achieved. Since the 2030 target was achieved earlier than expected, a more ambitious 2030 target with a revised baseline has been set. We have also rebaselined our gender equity targets.

Target[2]	2025 performance or status	End date
$10 billion social and affordable housing Fund and facilitate at least $10 billion of investment by end 2030, including $750 million in 2025, to deliver homes to buy and rent that are more affordable, accessible or sustainable.[3]	Since October 2018, we have funded and facilitated $7.37 billion to support the delivery of more affordable, accessible or sustainable homes to buy and rent. This includes $892.79 million allocated towards the target in 2025[4], exceeding our $750 million 2025 sub-target.	2030
$100 billion social and environmental activities Fund and facilitate at least $100 billion by end 2030, including $18.5 billion in 2025, in social and environmental activities through customer transactions and direct investments by ANZ. This includes initiatives that aim to help lower carbon emissions, protect nature, increase access to affordable housing and promote financial wellbeing.[1]	Since 1 April 2023, we have contributed $84.72 billion towards the target, across 412 customer transactions, of which $42.09 billion is funded, $38.96 billion is facilitated, and $3.67 billion is from direct investment through 61 bond purchases. This includes $45.75 billion allocated towards the target in 2025[4], exceeding our $18.5 billion 2025 sub-target.	2030
Sectoral pathways[5] Sectoral pathways and 2030 interim targets in place for 10 sectors or sub-sectors, to transition lending to net zero financed emissions by 2050.	Eight are 'on-track', two are 'close to on-track', and none are 'off-track'. For more information, refer to pages 32-51 of the 2025 Climate Report available at **anz.com/esgreport**.	2030
Operational emissions[6] Reducing combined Scope 1 and Scope 2 emissions by 85% by 2030 (against a 2024 baseline).	Having achieved our 2030 target of a 90% reduction (against a 2015 baseline) earlier than expected, we have revised our combined Scope 1 and Scope 2 emissions reduction target with a more ambitious baseline year of 2024.	2030
Gender equity targets[6] Increase representation of women as Key Management Personnel[7] to at least 40%. Increase the representation of Women in Leadership by 1 percentage point from baseline of 40.5%.	Rebaselined targets for 2026.	2026

1. For further detail on ANZ's approach for assessing the eligibility of transactions for inclusion towards the target, refer to the ANZ Social and Environmental Sustainability Target Methodology available at **anz.com/esgreport**. **2.** Targets exclude Suncorp Bank unless otherwise stated. **3.** Eligible housing transactions that also meet the eligibility criteria for the social and environmental target to achieve $100 billion by end 2030 may contribute towards both targets. **4.** FY25 includes transactions validated as eligible for inclusion in the target from 21/09/2024 to 19/09/2025. **5.** Our 2025 Climate Report available at **anz.com/esgreport** details important information about the scope of our sectoral pathways. Revised pathways and targets include customers of Suncorp Bank that meet our in-scope criteria for inclusion in our pathways. **6.** Includes Suncorp Bank. **7.** 'Senior Executive' means "KMP", which means Chief Executive Officer and Disclosed Executives as set out in the Remuneration Report contained within the 2025 Annual Report.

Improving non-financial risk management

Material ESG issue

Non-financial risk management

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.

Robust non-financial risk management practices underpin a strong, resilient bank that delivers for all customers, and therefore for shareholders. 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.

Regulatory oversight

ANZ's non-financial risk management is a key priority for its core regulators.

On 3 April 2025, the bank confirmed it had entered a court enforceable undertaking (CEU) with APRA for matters relating to NFR management practices and risk culture across the Group. In addition to accepting the CEU, APRA required that ANZ to hold a further operational risk capital overlay of $250 million, taking ANZ's total operational risk capital overlay to $1 billion.

ANZ's response to the CEU

As part of the CEU agreed with APRA, ANZ appointed an independent reviewer to identify root causes and behavioural drivers of shortcomings in ANZ's non-financial risk management practices and risk culture.

The enterprise-wide review informed the development of ANZ's Root Cause Remediation Plan (RCRP) which was submitted to APRA on 30 September 2025.

The RCRP includes a defined set of Target States and outlines deliverables across seven core workstreams including *Governance, Accountability and Operating Model, NFR Framework and Processes, Culture, Performance and Remuneration, Capabilities, and Data and Systems.*

The RCRP was approved by APRA on 7 November 2025. Its approval marks the next phase in the delivery of our obligations under the CEU.

Delivering on the RCRP

ANZ has an opportunity to improve the way it operates to ensure it is providing customers a simple, efficient, and reliable service that meets their needs, keeps its promises, and consistently delivers the experience they should expect from ANZ.

ANZ expects to spend approximately $150 million on implementing the plan required under the RCRP in 2026. This will be funded by de-prioritising other initiatives.

Delivering on the RCRP is a multi-year process. This work will take approximately three years with the first year dedicated to design, followed by two years to implement and embed.

ANZ will emerge a stronger, confident organisation with solid risk management and customers at its core.

ANZ have appointed Promontory to provide independent assurance of its progress against the RCRP and reports outlining progress will be available on **anz.com**.

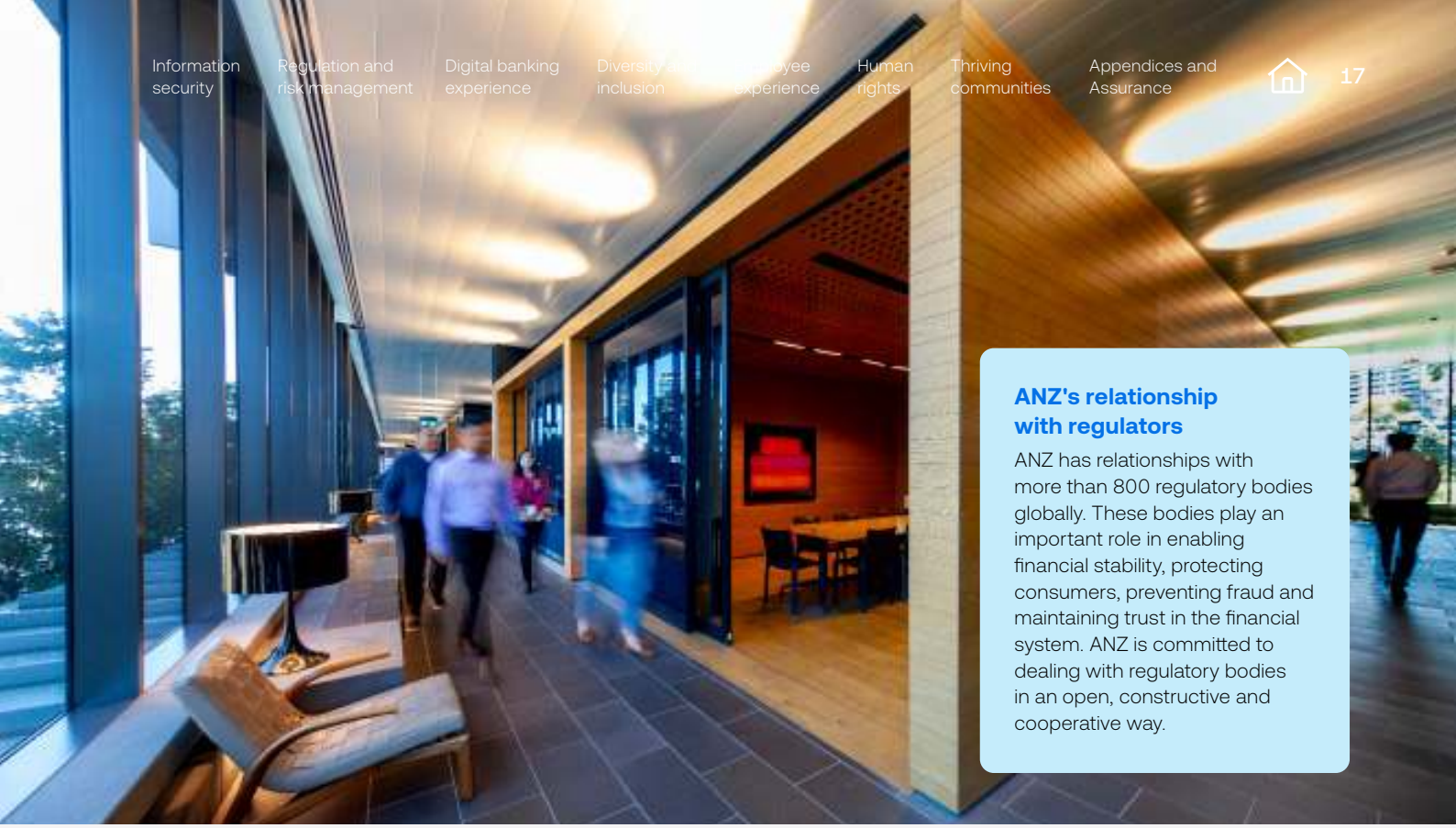
Establishment of an Enterprise NFR Program

To lead the bank in its NFR uplift and response to the CEU, ANZ has established an Enterprise Non-Financial Risk Program, Program PACT (People, Accountability, Customers and Trust).

Program PACT, alongside the prioritisation of Critical Risk Programs (CRPs) like the Retail ASIC matters and Global Markets remediation responses, reflects a commitment to deeply embed NFR frameworks, governance (see "Settlement of ASIC investigation" section on page 17), practices and behaviours that improve customer outcomes by driving sustainable business outcomes and risk ownership - underpinned by a proactive culture and disciplined execution.

Over the next three years, the focus of Program PACT is on demonstrating that our approach to NFR management is embedded and sustainable. It will be measured not by task completion but proof of:

- **Behavioural adoption**
  Reinforce a culture where risk is proactively managed, and where divisional leaders are empowered - and expected - to own and prioritise NFR management.
- **Governance maturity**
  Strong governance is the bridge between intent and action. ANZ is committed to ensure that the systems, frameworks, and controls introduced – not only for the Enterprise NFR Program – are consistently maintained and applied to other programs across the bank.
- **Outcome delivery**
  Following behavioural change and governance, ANZ committed to deliver the intended outcomes and demonstrate impact. ANZ needs to do what it said it will do–on time, to standard, and with external validation from the Independent Reviewer and APRA.
- **Continuous improvement**
  Across the bank, ANZ will be able to consistently identify, detect, improve on and fix NFR deficiencies.



ANZ's relationship with regulators

ANZ has relationships with more than 800 regulatory bodies globally. These bodies play an important role in enabling financial stability, protecting consumers, preventing fraud and maintaining trust in the financial system. ANZ is committed to dealing with regulatory bodies in an open, constructive and cooperative way.

Responding to the CEU

ANZ's response to the CEU has culture at its core. Its commitment extends beyond the design, implementation, and embedding of a framework and system. It encompasses critical focus areas such as leadership, NFR capability, and a strengthened control and process environment – all of which is underpinned by the enterprise-wide cultural change the CEU requires. The program is business owned and led.

Settlement of ASIC investigation

On 15 September 2025, ANZ announced it had reached an agreement with Australia's financial regulator, ASIC, to resolve five regulatory investigations into our Australian Markets business (Institutional) and Australia Retail division.

Under the agreement, which is subject to Federal Court approval, ANZ has agreed to pay a total penalty of $240 million. ANZ is undertaking specific remediation programs in both its Australia Retail division and Australian Markets business, which have interdependencies with the broader matters covered under the APRA CEU.

Australia Retail

The agreement covers three key issues:

1. Hardship support – Some customers didn't receive timely support when they were struggling financially, because ANZ didn't respond within required timeframes.

2. Deceased estates – ANZ didn't always respond to families in a timely way, and some accounts were charged fees after a customer had passed away.

3. Online Saver accounts – Some eligible customers missed out on bonus interest they were promised due to system and process errors, and ANZ didn't always show correct rates on its application form.

Markets

The penalty for our Markets business relates to two separate issues:

1. Role as Duration Manager for an AOFM Bond Issuance

- ANZ was appointed by the Australian Office of Financial Management (AOFM) to act as the Duration Manager for a large bond issuance in April 2023.
- ANZ agreed with ASIC that in its role as Duration Manager, it didn't adequately communicate with the AOFM about the intended manner of its trading or the progress of its hedging activity, given the timing and manner of ANZ's trading. This was unconscionable conduct.
- ANZ also failed to accurately report to the AOFM after the transaction and in doing so, made false or misleading representations and agreed that in carrying out its role as Duration Manager, ANZ breached some of its licence obligations.
- ASIC has not alleged that ANZ engaged in market manipulation or over-hedging on the AOFM issuance. All of ANZ's trading as Duration Manager was to hedge the risk borne by it in connection with our role.

2. Incorrect data reporting

ANZ provided inaccurate monthly secondary bond turnover data to the AOFM over a period of almost two years and made a false annual attestation to the AOFM about that data. ANZ also failed to comply with its breach reporting obligations in relation to the inaccurate data reporting.

Code of Conduct

Material ESG issue

ANZ's Code of Conduct (the Code) sets the standards for behaviour expected at ANZ.

Our approach

The Code requires that all ANZ employees and contractors:

- are ethical and professional;
- act with integrity;
- treat everyone with dignity and respect;
- manage conflicts of interest;
- protect privacy and confidentiality;
- comply with the Code, policies and the law; and
- call out unacceptable behaviour and stand up for what is right.

The Code is supported by a suite of policies that are regularly reviewed to ensure they reflect legislative changes and good practice.

ANZ also expects partners (including suppliers, service providers and other relevant third parties) to adopt and uphold similar standards of ethical behaviour as outlined in the Code and ANZ's Supplier Code of Practice.

ANZ's Code of Conduct is available at **anz.com/corporategovernance**. For more information on how ANZ is managing ESG risks in our supply chain see page 41.

Training

To manage ethical conduct and compliance with the Code, all employees and contractors must complete mandatory training courses within two months of joining ANZ and regularly thereafter.

Key mandatory training courses related to the Code and its supporting policies include:

- Living the Code[1]
- Equal Opportunity (including anti-discrimination and sexual harassment)
- Privacy, Data Protection and Ethics
- Conduct Risk
- Anti Money Laundering/Counter Terrorism Financing
- Sanctions
- Anti-Bribery and Corruption
- Internal and External Fraud
- Whistleblowing

ANZ monitors the completion rate for mandatory training courses, which was 99.86% enterprise-wide in 2025.

Employees who do not complete training within 30 days of the due date (without exceptional circumstances) are ineligible for fixed remuneration increases or variable remuneration payments during the annual Performance and Remuneration Review (PRR), ensuring accountability and incentivising compliance.

Performance management guides and other materials are made available to all employees on our intranet. This guidance includes impacts to performance and remuneration outcomes in our annual PRR for employees who do not meet expected standards of performance or behaviour.

Outcomes

We monitor compliance with the Code by tracking employee relations cases, with analysis of breaches and outcomes to identify trends and areas for improvement.

In 2025, there were 1,569 employee relations cases involving alleged breaches of the Code[2], (1,400 in 2024) with 567 cases resulting in formal consequences or the employee leaving ANZ. This was an increase from 488 cases in 2024.

Outcomes following investigations of Code breaches in 2025 included 337 warnings, 127 terminations and 103 employees otherwise leaving ANZ.

A breakdown of alleged breaches of ANZ's Code of Conduct is provided in the 2025 ESG Data and Frameworks Pack available at **anz.com/esgreport**.

Matters relating to conduct were highlighted in the court enforceable undertaking from the Australian Prudential Regulation Authority (APRA). More information on these matters is available on pages 16-17.

1. Completion of Living the Code requires participants to confirm their understanding of, and compliance with, the Code's principles over the past year. **2.** Includes Suncorp Bank.

Whistleblower Program

Material ESG issue

Our approach

ANZ's Whistleblower Policy and Program is a key component of our conduct risk management and corporate governance framework. The Board has oversight and governance of the policy and program. A de-identified summary of material whistleblower matters is also reported to the relevant Board committee quarterly and to the Operational Risk Executive Committee.

Program processes are also set out in the policy, including how eligible whistleblowers can report concerns, the protections that will apply, how the concerns will be considered and/or investigated, and resources.

Training

All employees and contingent workers are required to undertake annual mandatory training on their obligations and responsibilities under the policy. Whistleblower Investigators, Whistleblower Protection Officers, and eligible recipients of whistleblower reports (including Executive Committee[1] 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.

Outcomes

We received 264 whistleblower reports in 2025, an increase from 222 in 2024[2]. This year, 61% of assessed reports were within the scope of the Program. Reports involved themes and allegations of breaches of the Code of Conduct and other policies; bullying and harassment; discrimination; conflicts of interest; fraud; maintaining safe work environments; privacy and confidentiality breaches; and other misconduct.

Recommended actions and outcomes from investigated reports included termination of employment, formal warnings, coaching and informal counselling, review and remediation of policy, process and procedures, improved oversight, additional training and communications reinforcing expected standards of behaviour.



Key actions in 2025

- Introduced a new external whistleblower reporting, and integrated case management and reporting service.
- Delivered 201 awareness sessions to business units by the Group Integrity team who conduct investigations into allegations of internal fraud, theft, bribery, corruption and insider crime involving ANZ employees and contractors.
- Jurisdiction and business specific awareness sessions delivered by the Program team designed to build trust in the process and program, improve understanding of whistleblower protections, and promote available channels.
- Updated the Program's training course for eligible recipients of whistleblower reports.

ANZ's annual employee survey indicated continued high levels of awareness and confidence in the program, and reporter protections across the organisation.

ANZ's Whistleblower Policy is available at **anz.com/corporategovernance**

1. Executive Committee (ExCo) comprises ANZ's most senior executives. The members of ExCo are available at **anz.com/exco**. **2.** Report volumes for 2024 include Suncorp Bank from 31 July 2024 to 30 September 2024. Suncorp Bank is also included for 2025.

Putting our customers first

Material ESG issue

We acknowledge that, at times, we have let our customers down. Despite our good intentions, we have not consistently lived up to their expectations.

In particular, some of our failings occurred when our customers were at their most vulnerable. For this we are deeply sorry, and we are making changes to better support our customers when they need us most.

On 15 September 2025, ANZ announced it had reached an agreement with the Australian Securities and Investments Commission (ASIC) to resolve five regulatory investigations into our Australian Markets business (Institutional) and Australia Retail division.

For our Australian Retail division this includes three key issues: hardship support, deceased estates and Online Saver accounts – as covered on page 17.

We have established an ASIC Matters Resolution Program in Australia Retail, ensuring we bring the appropriate governance, oversight and accountabilities to resolve these and other outstanding ASIC regulatory matters.

We will not accept these sorts of failures that impact on our customers: it is why we are committed to driving a company-wide transformation to uplift non-financial risk (NFR) to strengthen our core processes, systems and controls.

However, it's important to note that we are not uplifting NFR simply to meet regulators' expectations. We are doing it because it is better for our customers and the quality of our business.

This uplift is already underway with measurable improvements across the bank to better protect and care for our customers. For example, we are rebuilding the customer proposition for deceased estates, including improving both response times to freeze accounts after being notified of a customer's passing, and responding to beneficiaries and executors in formalising their estates.

We also discuss on the next pages our approach to hardship, supporting customers with extra care, customer complaints, prioritising access for low-income customers and enhancements we have been making in line with the revised Banking Code of Practice.

For more information on how ANZ is improving non-financial risk see pages 16-17

A key pillar of our **refreshed strategy**, ANZ 2030, is putting our customer first. With market leading, differentiated and superior propositions, we will raise the standard of every digital and human interaction for our customers.

We are also re-engineering and automating lending submissions and manual processes, and using artificial intelligence to improve, among other things, quality control and complaints analytics.

We are acutely aware that delivery and execution are central to our ability to meet and exceed the expectations of our shareholders, customers and colleagues.

Further information on our ANZ 2030 strategy is provided in the 2025 Annual Report available at **anz.com/annualreport**

Key actions in 2025

Revised Banking Code of Practice

During the year, ANZ's Australia Retail and Australia Commercial divisions, and Suncorp Bank implemented key enhancements in line with the revised Banking Code of Practice (the Banking Code) which came into effect on 28 February 2025. The ANZ Non-Financial Risk Framework[1] and Policy have governed compliance with the Banking Code of Practice this year.

Key enhancements to the Banking Code included:

- new deceased estates provisions;
- expanded definitions of small business and vulnerability;
- a new requirement for banks to meet with prospective guarantors before accepting a guarantee; and
- requirements for banks to organise free interpreter services where appropriate.

The Banking Code is important to our customers because it provides consumer protections, which often go beyond the law.

ANZ is tracking the effectiveness of the changes through various mechanisms, including monitoring how key processes are working in practice, relevant training completion by employees, preventative and detective controls, and monthly reviews of complaints and risk events to identify incidents of non-compliance and identify uplift opportunities.

ANZ and Suncorp Bank continue to report breaches to the Banking Code Compliance Committee as required and respond to its inquiries and requests for information.

Providing low-income customers access to products and services that best suit them

In July 2025, the Australian Securities and Investments Commission (ASIC) released the *Better and beyond report* (Report 811), highlighting follow up work from its *Better banking for Indigenous consumers report* in July 2024 (Report 785).

We have delivered several commitments as part of ASIC's review in 2025. These include:

- → Providing approximately $2 million in refunds to customers in ASIC's project cohort[2].
- → Committing to refund more than $50 million to approximately 600,000[3] low-income customers nationally in 2026.
- → Moving over 300,000 eligible customers to a basic account (low or no fee accounts).

We have committed to continuing to migrate eligible customers to basic accounts on an ongoing basis.

We continue to prioritise access for low-income customers to products and services that best meet their needs, having already simplified the account opening process by removing the requirement to prove eligibility for basic accounts in branches. In addition, we continue to enhance our banking services to provide more inclusive and accessible banking services for First Nations customers.

Suncorp Bank

ASIC also engaged with Suncorp Bank on refunding fees to low-income Australians. Suncorp Bank has committed to refund more than $3 million to over 43,000 eligible customers, which commenced in 2025 and is expected to conclude in 2026. Customers will receive an amount greater than the fees originally incurred to account for the time value of money. Suncorp Bank has implemented an opt-out migration to a low-fee account, moving 7,260 customers over the months of May and June 2025. Going forward this opt-out migration process will occur on a semi-annual basis.

1. Non-Financial Risk Framework are procedures that define how ANZ employees should consistently and effectively identify, assess, manage, monitor and report on non-financial risk. **2.** Customers of the participating banks who lived in the Indigenous pilot locations or received ABSTUDY payments between 1 July 2019 and 31 August 2024 and customers (where identifiable) who interacted with a participating bank's specialist Indigenous service channels such as an Indigenous call line. **3.** Customers who qualify for remediation and identified as eligible for a basic account between the review period (July 2019 – June 2025). A portion of these customers have either moved to a basic account, may be included in future migrations, or are no longer eligible for migration.

Supporting customers in need of extra care

Material ESG issue

Vulnerability impacts people in different ways. It can reduce a customer's ability to engage with banking services, make informed decisions, consider choices, and evaluate information. These consequences may affect the way that the customer engages with their bank.

Our approach

ANZ aims to provide extra care to customers who may be experiencing vulnerability, while also taking measures to enhance access to its banking products and services.

Australia[1]

ANZ's Australia Retail and Australia Commercial divisions have High Impact Processes (HIPs) in place for specific areas where customers may experience greater levels of detriment if we fail to provide extra care. HIPs aim to ensure the bank's processes with the greatest potential impact to customers requiring extra care are operating effectively and are appropriately governed. HIPs related to supporting customers in need of extra care were introduced during the year including culturally appropriate and accessible banking for First Nations customers and supporting victim-survivors of family violence.

In September 2025, ANZ entered into an agreement with the Australian Securities and Investments Commission (ASIC) to resolve five matters within our Australian Markets business and Australia Retail division that were the subject of separate regulatory investigations, including matters relating to hardship support and deceased estates. The agreement with ASIC sends a clear signal that our approach to delivering good customer outcomes needs to improve. For more information on these matters and how we will improve see pages 16-17.

Training

Building our capability remains a focus area, equipping employees to recognise when a customer is experiencing vulnerability and respond to their circumstances with tailored support.

In preparation for commencement of the revised Banking Code of Practice in February 2025, ANZ reviewed and enhanced its suite of related training and resources, including to ensure it aligned with the new strengthened provisions around vulnerability, accessibility and inclusivity. This training is mandatory for employees in the Australia Retail and Australia Commercial divisions who engage directly with customers or who support others who engage directly with customers.

Additionally, through our partnerships with external organisations, training has been provided on specific areas of focus. For example, providing extra care to customers who are incarcerated, or recently released from incarceration, is a new characteristic listed in the revised Banking Code of Practice. About Time, in conjunction with ICAN Learn, delivered training to complaint-handling employees in Customer Resolution on the experiences of people in prison and their challenges maintaining and regaining financial independence. Additionally, training has been provided to our specialised teams, such as the Extra Care Hub, on financial abuse.

Resources and support available to our customers available online:

- Dealing with the unexpected
- Family violence support
- Financial hardship
- First Nations Customer Support Line

Key actions in 2025

ANZ's Extra Care Hub (ECH) is a specialised pathway team of trained bankers whose role is to support customers impacted by family violence, financial abuse or cognitive capacity concerns. In 2025, the ECH team almost doubled, enabling them to extend support to additional teams including Customer Protection, Financial Wellbeing Assist and Mobile Lending. The ECH's contact details are available via the ANZ website, the ANZ App and internet banking platforms, allowing for faster access and responses to customers requiring assistance. In 2025, the ECH team assisted more than 5,500 customers, a 101% increase from 2024.

In 2025, we continued to partner with Uniting CareRing to support customers impacted by family violence. CareRing connects customers to services including housing support, social workers, drug and alcohol support, employment services and financial counselling.

Last year, we reported on a pilot program involving the use of dynamic algorithms to identify indicators of financial abuse. In 2025, this program was made permanent.

1. Excludes Suncorp Bank.

Our branch network

Over the past decade, we have seen a long-term shift in how our customers choose to bank with us, with the number of customers coming into a branch for transactions reducing significantly.

We understand however that there are many occasions where it's important for our customers to engage with us via our customer contact centre and our branch network. Our branch bankers both assist and educate our customers on how to navigate their banking needs in a safe manner. We continue to operate a large network of branches, offering access to specialist bankers across Australia's metropolitan and regional hub locations. Branches also provide access to cash withdrawals and deposits via telling services or Smart ATMs.

In the event that we make changes to individual branches within our network, analysis of customer behaviour is considered before decisions are made. We also aim to proactively contact our customers, prioritising those requiring assistance with their banking.

Under the Federal Treasurer's approval conditions for purchasing Suncorp Bank, the number of Suncorp Bank and ANZ's regional bank branches may not be reduced during the three years from the date ANZ acquired Suncorp Bank.

New Zealand

Our approach

ANZ Bank New Zealand supports customers needing extra care through a structured and compassionate approach.

This is achieved by empowering and coaching employees to recognise signs of vulnerability and respond with empathy. When further support is required, employees can access internal resources or escalate complex cases to the Customer Vulnerability Team via a specialised pathway. Where a case is more complex, they will work with cross-functional teams to find the appropriate solution.

Key actions in 2025

Escalation volumes are tracked by the Customer Vulnerability Team to help ANZ Bank New Zealand maintain effective support and ensure appropriate care is provided. Following targeted training for senior customer-facing leaders in late 2024, escalation volumes doubled, indicating improved employee awareness and responsiveness. These escalations enable earlier intervention and more consistent support for vulnerable customers. Escalation data is reported to the New Zealand Leadership Team and the ANZ New Zealand Board.

In 2025, ANZ Bank New Zealand further strengthened governance by appointing a dedicated manager to uplift our approach to customers requiring extra care and lead initiatives. These include strengthening our Vulnerability framework to enhance governance, improve processes, and provide guidance to support customers experiencing vulnerabilities. The framework builds on ANZ New Zealand Bank's existing processes, guidance, and specialist teams, to bring them together in a cohesive and structured way.



Building our capability remains a focus area, equipping employees to recognise when a customer is experiencing vulnerability and respond to their circumstances with tailored support.

Financial hardship

Material ESG issue

While financial conditions have begun to ease across Australia and New Zealand, higher inflationary environments continue to influence borrowing and household spending – shaping broader economic resilience. There are occasions when customers are unable to meet their financial obligations. While in some cases these difficulties are temporary, others may be prolonged or permanent, requiring tailored support and careful review to restore financial stability.

Australia[1]

Our approach

Our teams are trained to have respectful and empathetic conversations to identify the options that are appropriate for each customer's individual circumstances. They are also trained to identify hardship triggers and support customers holistically, considering all lending facilities.

Data-driven insights play a critical role in early identification of customers at risk of hardship. Analysis of savings, credit, and offset accounts allows us to proactively contact customers who may have experienced a significant income reduction or are receiving unemployment benefits.

Available assistance includes:

- Temporary reduction or pause of repayments
- Interest-only repayment periods
- Loan restructuring, including capitalisation of late payments
- Access to financial literacy programs, MoneyMinded and Saver Plus
- Debt reduction and, in exceptional cases, debt forgiveness
- Referrals to external support services[2] – Way Forward Debt Solutions, CareRing, Fitted for Work, and 1800RESPECT
- Referral to financial counselling via the National Debt Helpline and Small Business Debt Helpline

In October 2025, we launched our refreshed strategy, ANZ 2030. Under the customer first pillar of ANZ 2030, we aspire to raise the standard of every digital and human interaction for our customers. Further information on our strategy is provided in our 2025 Annual Report available at **anz.com/annualreport**.

Current environment

With continued cost-of-living pressures, we expect the number of customers facing hardship to persist. In 2025, Australian customers that were new in hardship and receiving assistance[3] remained steady at 13,931, compared to 14,031 in 2024.

Currently 4 in every 1,000 Australian ANZ home loan customers and approximately 2 in every 1,000 Australian ANZ small business customers are receiving hardship assistance.

Importantly, over 68% of customers who entered hardship have either paid out their facility in full or are up-to-date on their repayments within 12 months.

Over the past 12 months, we have proactively contacted more than 191,000 home loan customers to review the suitability of their loan arrangements. Interventions ranged from early hardship offerings to payment reminders, with on-time payments improving by an estimated 24% among contacted customers.

For further information on ANZ's financial hardship assistance is available at **anz.com/financial-hardship**

Settlement of ASIC investigation

In Australia, financial hardship practices are governed by multiple regulators and bodies as well as the Banking Code of Practice and National Credit Code.

In September 2025 ANZ entered into an agreement with the Australian Securities and Investments Commission (ASIC) to resolve five matters within our Australian Markets and Australia Retail businesses that were the subject of separate regulatory investigations.

Under the agreement, which requires Federal Court approval, ANZ is subject to a $40 million penalty for breaching its obligations in relation to its handling of customer hardship notices. ANZ failed to respond to 488 Australian customers' hardship notices within required timeframes and failed to have proper hardship processes in place.

For more information on ANZ's settlement of ASIC's investigation see page 17

1. Excludes Suncorp Bank. **2.** Way Forward Debt Solutions provides free debt management services to assist people struggling to manage multiple debts to establish affordable arrangements with their creditors and assist management of debt repayment. CareRing connects customers to a coordinated range of support services including housing support, social workers, drug and alcohol services, home energy assessments and employment services. Fitted for Work supports female-identifying jobseekers to improve their employment prospects by developing a résumé, writing a cover letter and provisioning appropriate work clothes. 1800RESPECT is a domestic family and sexual violence counselling service. **3.** The statistic quoted uses underlying data which captures the number of accounts which are receiving hardship assistance, which include Home Loans, Personal Loans, Credit Cards and Small Business Banking. Multiple customers can be a party to an account. As of September 2025.



New Zealand

Our approach

ANZ Bank New Zealand's approach to hardship includes working with customers to explore options to help them through difficult times and provide financial assistance.

Available assistance includes:

- Repayment arrangements
- Temporary pause of repayments
- Interest-only repayment periods
- Loan restructuring, including capitalisation of late payments
- Debt consolidation
- Debt reduction and, in exceptional cases, partial or full debt forgiveness
- Interest rate concessions
- Referral to financial counselling via MoneyTalks (free financial mentoring)

Hardship practices in New Zealand are governed by the Credit Contracts and Consumer Finance Act (CCCFA), which outlines obligations for lenders in supporting customers experiencing financial hardship.

Key actions in 2025

In 2025, the number of New Zealand customers newly receiving hardship assistance increased 19% from 4,021 in 2024 to 4,780 in 2025. Common hardship drivers remained consistent and included redundancy, reduced working hours, illness, relationship breakdowns, and financial stress due to interest rates and living costs.

In 2025, leveraging enhanced data analytics to identify customers at risk of missing payments, ANZ conducted outreach via the goMoney App and SMS to the top 2% of at-risk customers identified, with over 135,900 messages sent. The aim was to encourage customers to engage with ANZ if support was needed.

In addition, a pilot proactive calling program was run, targeting a cohort of high-risk home loan customers each month, with the aim to provide early intervention support.

The results of the pilot proactive calling program showed:

Contacted customers were

38%

less likely
to become delinquent.

47%

took **positive action** such as hardship applications, loan term extensions, interest-only arrangements.

Further information on ANZ Bank New Zealand's financial hardship support is available at **anz.co.nz/banking-with-anz/financial-hardship/**

A review of 2,951 ANZ Bank New Zealand customers who exited hardship treatment in the six months to July 2025 was conducted to understand the outcomes from our hardship assistance.

The results showed

91%

of customers have either paid off their facility in full or are up-to-date on their repayments, indicating that most hardship events are temporary and treatments are effective.

9%

of customers transitioned to active Customer Financial Wellbeing (CFW) case management, requiring longer-term support.

Customer complaints

Material ESG issue

Complaints are an important way for our customers to voice their concerns, and for us to learn where we can improve our products and services to deliver better outcomes for our customers.

Our approach

Our process is governed by our Complaints Handling Policy[1], and Australia and New Zealand each have a Complaints Guide. We strive to deliver excellent products and services to our customers, but when we get things wrong, we are committed to working with customers to understand what's happened and to try to resolve the complaint promptly.

Customers can lodge a complaint with ANZ online or with customer-facing employees for Retail and Commercial in Australia and through a number of channels in New Zealand. We strive to resolve complaints at first point of contact and where additional support is required complaints are escalated to internal specialist complaint resolution teams in Australia and New Zealand to work with the customer to do our best to find a fair and timely resolution.

If a customer is not satisfied with the proposed resolution of their complaint, they can escalate their complaint to the Australian Financial Complaints Authority (AFCA) or the New Zealand Banking Ombudsman Scheme (BOS).

Complaints data and insights are analysed and regularly reported to senior management with a key focus on monitoring performance, complaint volumes, trends, actions being taken to address complaint drivers, and customer experience improvements.

Australia[2]

Outcomes

Throughout 2025, Australia Retail deployed a number of initiatives to support complaint transparency, including:

- complaint awareness sessions for frontline bankers to enhance their ability to detect complaints and accurately capture relevant information; and
- an automated complaint detection tool to identify complaints received via the Message Us service in the ANZ App.

These initiatives are helping our bankers more effectively recognise and respond to complaints. These uplifts contributed to a material increase in the number of complaints recorded through the year of 44%, but also improved the insights into customer pain points allowing targeted service improvements.

Despite the increase in the volume of complaints, prompt resolution remained a priority with 86% resolved within five working days (2024: 83%) and approximately 99% of all complaints resolved within the 30-calendar-day timeframe (2024: approximately 99%).

Further comprehensive guidance and training have been developed for Australia Retail and Commercial employees. The first phase of the rollout commenced with the Leadership Team in June 2025, followed by a broader rollout scheduled for November 2025.

The core complaint categories[3] included service quality, account set-up and maintenance, channel accessibility, fees, interest and rewards, and fraud and scams. Service quality accounted for 28% of total complaints received (2024: 31%), followed by channel accessibility accounting for 20% of total complaints received (2024: 16%).

ANZ continues to report internal complaints data to the Australian Securities and Investments Commission (ASIC) on a six-monthly basis.

A Complaint Governance Forum is held monthly and provides end-to-end oversight of the Australia Retail and Australia Commercial disivions' complaint handling processes with a key focus on monitoring the performance and effectiveness of these processes, complaint volumes, trends and themes including actions being taken to address complaint drivers. Complaints data and insights are also reported to the Board and the Operational Risk Executive Committee on a six-monthly basis.

New Zealand

Outcomes

This year, ANZ Bank New Zealand recorded over 33,800 complaints, a decrease of 3.8% compared to 2024. ANZ Bank New Zealand have also seen a 40% decrease (from 70 in 2024 to 42 in 2025), in complainants seeking an independent review from BOS of their concerns and our resolution offer due to a decrease in fraud and scams complaints. We continue to identify insights and opportunities to improve, from complaints managed internally and those that require escalation to BOS, and continuously refine our complaints handling approach to consistently target a fair and balanced outcome.

Fees, charges and rates accounted for 41% of total complaints received, with 'fee, charge or rate excessive/unfair' the top issue in 2025. 'Personal transaction account', 'Credit card', and 'Home Loan' were the products with the most complaints, in line with the higher share of customers who hold these products. The most common concerns included 'Fee, charge or rate excessive/unfair', 'Error with fee, charge or rate', and 'Failure to act as instructed/promised'.

The percentage of complaints resolved within five working days increased to 90%, compared to 89% in 2024; and the percentage of complaints resolved within 30 calendar days of receipt increased to 98% compared to 97% in 2024.

More information on Australia's customer complaints process is available at **anz.com/support/complaints**

More information on ANZ Bank New Zealand's customer complaints process is available at **anz.co.nz/about-us/complaints**

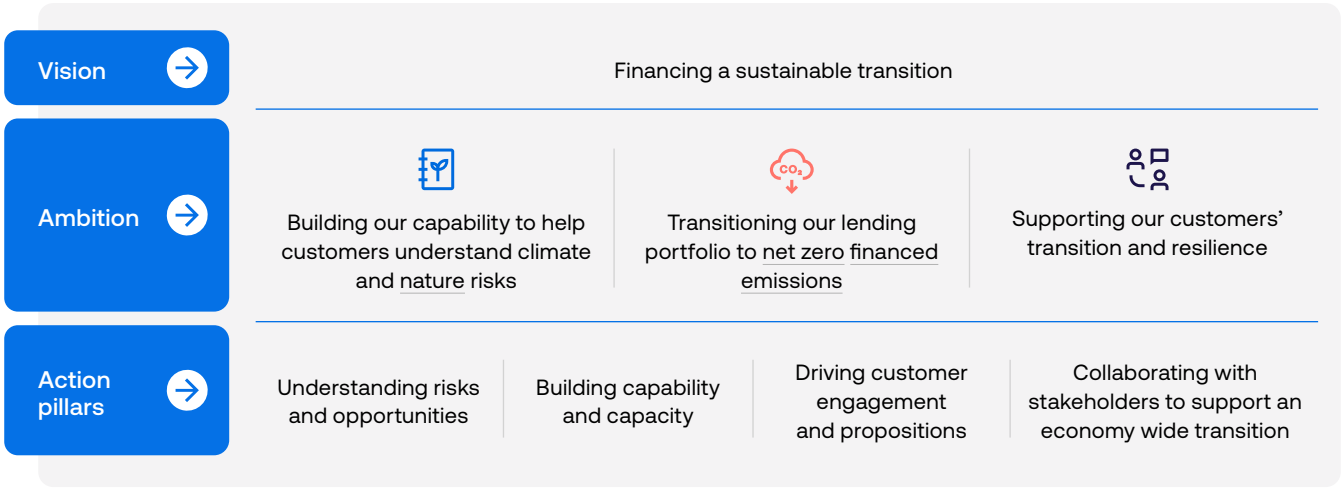
Data relating to complaints in Australia and New Zealand is available in our 2025 ESG Data and Frameworks Pack available at **anz.com/esgreport**

1. Suncorp Bank has retained their Complaints Management Policy. Following the acquisition on 31 July 2024, 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, outlined on page 2. **2.** Excludes Suncorp Bank.
3. Multiple categories may be allocated to a single complaint.

Our Climate and Environment Strategy

Material ESG issue

Our vision at ANZ is to finance a sustainable transition. Our Climate and Environment Strategy (C&E Strategy) sets out our objective to be a trusted partner for our customers, supporting them to adapt and become more resilient to a changing environment and economy.
In particular, we aim to be a leading bank in supporting an effective and orderly transition for our large business customers.



We have established three core ambitions, supported by four action pillars that bring together the themes of the steps we are taking to deliver on our ambitions. These ambitions and action pillars are supported by having specific focus areas and prioritised action plans for our Institutional, Australia Commercial, Australia Retail and New Zealand divisions that we commenced implementing aspects of this year.

Our approach to transition planning

In 2025, we took further steps to progress our transition planning. Our C&E Strategy forms the basis for our approach, including how we plan to support an effective and orderly transition for our large business customers. We also draw on guidance from the Glasgow Financial Alliance for Net Zero (GFANZ) and the Transition Plan Taskforce (TPT) transition planning frameworks to inform areas of focus in our C&E Strategy.

Refer to the 2025 Climate Report for relevant Indexes, available at anz.com/esgreport

Our C&E Strategy ambition is supported by our Climate Change Commitment of transitioning our lending portfolio to net zero financed emissions, reflecting where we can have the most significant impact. We estimate our lending to Institutional customers contributes approximately two-thirds of our total financed emissions. The remaining financed emissions arise from our lending to our commercial and retail customers. Our Climate Change Commitment will be available prior to our Annual General Meeting at **anz.com/climate-change**.[2]

The actions under our C&E Strategy demonstrate our progress towards credible transition planning. We acknowledge that ongoing work is required to satisfy a robust and well-developed transition plan.

In this report, we set out the actions we have progressed and how we have been supporting our customers' transition.

Our climate and environment targets

Our climate and environment targets support the delivery of our C&E Strategy. We continue to make progress, including funding and facilitating $84.72 billion towards our $100 billion target in social and environmental activities[3] by 2030. Separately, eight of our revised sectoral pathways are 'on-track', two are 'close to on track', and none are 'off track'. We also recognise our role in reducing the emissions from our operations and have continued to reduce our Scope 1 and Scope 2 emissions across our operations.[4]

Refer to the 2025 Climate Report available at **anz.com/esgreport** for further details on our 2025 climate and environment targets and progress, including our sectoral pathways.[5]

Reflecting the upcoming mandatory climate disclosures in Australia[6] and a changing internal and external operating environment – we are reviewing our climate and environment targets to ensure they continue to be relevant and aligned with our strategy.

1. Our disclosures do not purport to be comprehensive or to satisfy all aspects of GFANZ or TPT's framework. **2.** The Climate Change Commitment excludes Suncorp Bank and ANZ Bank New Zealand. **3.** For further detail on ANZ's approach for assessing the eligibility of transactions for inclusion towards the target, refer to the ANZ Social and Environmental Sustainability Target Methodology available at **anz.com/esgreport. 4.** Refer to the 2025 Climate Report available at **anz.com/esgreport** including Appendix 7 Scope 1, Scope 2 and Scope 3 Operational Greenhouse Gas Emissions Reporting Methodology. **5.** Refer to the 2025 Climate Report including Appendix 5 ANZ Financed and Facilitated Emissions Methodology available at **anz.com/esgreport. 6.** Applying to ANZ Group for the financial year commencing 1 October 2025.

How we are driving our C&E Strategy ambitions

The below initiatives and activities illustrate how our actions connect to our three ambitions, supporting the progress of our C&E Strategy in 2025.

	Ambitions		
Implementing our Large Emitters Engagement Program	✓	✓	✓
Supporting our customers' transition through financing	✓	✓	✓
Understanding nature risks and opportunities	✓		
Building our capability to help our customers understand climate and nature risks	✓		✓
Collaborating with stakeholders to support an economy wide transition	✓	✓	✓
Managing climate risk	✓	✓	✓
Progress on our targets and metrics		✓	✓

For further information see the 2025 Climate Report available at **anz.com/esgreport**

Our future focus

We continue to evolve our approach to enable us to deliver our C&E Strategy ambitions.

Building our capability to help customers understand climate and nature risks

Improve our understanding of how climate and nature risks and opportunities affect customers and our lending portfolio by continuing to focus on training, data and tools used to support our customer engagement.

Transitioning our lending portfolio to net zero financed emissions

Continue to engage with our LEEP and certain sectoral pathways customers to support our commitment to transition our lending portfolio to net zero.

Continue to integrate climate risk and opportunities into policies, financing and risk decision making where relevant.

Supporting our customers' transition and resilience

Enhance customer propositions and engagement to support our customers' transition and improve their resilience.

Supporting our customers' transition through financing

Material ESG issue

This year, we continued to make good progress towards our target to fund and facilitate at least $100 billion by end 2030 in social and environmental activities through customer transactions and direct investments by ANZ.

As at 30 September 2025, we have contributed $84.72 billion in total towards the target since it commenced on 1 April 2023. The total comprises funding and facilitating $81.05 billion across 412 customer transactions and directly investing $3.67 billion through 61 labelled green, social and sustainability bond purchases held on ANZ's balance sheet.[1] This includes activities that aim to help lower emissions, protect or restore nature, increase access to affordable housing and promote financial wellbeing.

This year, we exceeded our 2025 goal to contribute at least $18.5 billion towards our target, with $45.75 billion added across 186 customer transactions and 61 bond purchases.[2] This comprised:

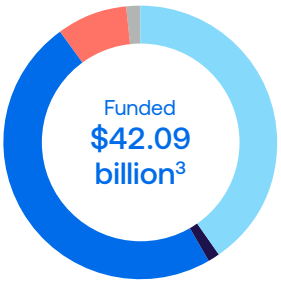
- $21.86 billion attributed to ANZ's on-balance sheet loans and other credit lines;
- $20.22 billion facilitated by ANZ; and
- $3.67 billion via direct investments (labelled bond purchases) held on ANZ's balance sheet.

In order to count towards the $100 billion target, customer transactions and direct investments are assessed against the criteria for eligible banking activities and eligible social and/or environmental activities specified in the methodology for the target. They may include:

- labelled sustainable finance;
- unlabelled banking activities; and
- ANZ's direct investments.

For further detail on ANZ's approach for assessing the eligibility of customer transactions and direct investments for inclusion towards the target, refer to the ANZ Social and Environmental Sustainability Target Methodology available at **anz.com/esgreport**

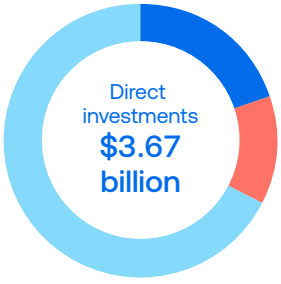
Progress towards our $100 billion social and environmental sustainability target – 1 April 2023 to 30 September 2025



- **40.32% Sustainability-Linked[4]**
  $16.97b Sustainability-Linked
- **1.35% Social and Environmental**
  $0.57b Other social and environmental[5]
- **$1.93b** Clean Transport
  $8.83b Energy
  $7.95b Green building[7]
  $1.55b Other environment
- **8.51% Social[8]**
  $2.04b Affordable housing
  $1.54b Other social
- **1.45% Sustainability-Linked and Environmental**
  $0.61b Sustainability-Linked and Environmental



- **14.93% Social and Environmental**
  $5.82b Other social and environment[5]
- **$1.49b** Clean Transport
  $10.72b Energy
  $4.35b Other environment
  $3.40b Green building[7]
- **5.94% Social[8]**
  $0.20b Affordable housing
  $2.12b Other social
- **27.90% Sustainability-Linked[4]**
  $10.87b Sustainability-Linked



- **$0.73b Green**
- **$0.47b Social**
- **$2.47b Sustainability**

1. This is the first year we have included direct investment contributions towards our target. To limit complexity, we have not included those made prior to 8 November 2024 (publication of the latest version of the target methodology) and those on or after 8 November 2024 where the overlapping facilitation amount in relation to the relevant bond issuance was included towards the target under the version of the target methodology that applied before 8 November 2024. **2.** 2025 includes transactions validated as eligible for inclusion in the target from 21/09/2024 to 19/09/2025. **3.** Funded $42.09 billion includes deals in "Waste" and "Water" which have deal values less than $0.10 billion. **4.** Note that for the purposes of this reporting, Sustainability-Linked transactions (i.e., where the economic characteristics (e.g., pricing outcomes) of the financial instrument are linked to predetermined sustainability performance objectives) are reported as a separate category. **5.** Includes activities which cover both environmental and social categories. **6.** Includes renewable energy, energy efficiency, clean transportation, green buildings, and other environmental activities. Other environmental activities include activities which cover multiple environmental categories and/or activities such as waste, sustainable water and waste water management, and climate change adaptation. **7.** Includes construction or operation of buildings or portfolios of buildings that deliver positive environmental outcomes, which meet, or renovation or retrofitting of buildings, so that they can meet regional, national or internationally recognised standards or certifications (e.g., under the Australian NABERS rating system). **8.** Includes affordable housing and other social activities. Other social activities include activities which cover multiple social categories and/or activities such as socioeconomic advancement and empowerment.

Material ESG issue

Financial education programs

Financial literacy is an essential skill in modern society – our programs build the financial capability and wellbeing of individuals so they can be more resilient to changes in their financial circumstances.

We have developed financial education programs in consultation with community partner organisations and government. These programs aim to provide real social benefits to the community by improving financial inclusion and capability of lower income individuals.

MoneyMinded

MoneyMinded is ANZ's flagship financial education program, supporting adults on lower incomes to build their financial skills, knowledge, and confidence. The program is delivered by community organisations in Australia and New Zealand as well as by community organisations and ANZ employees in 15 markets across Asia and the Pacific region.

MoneyMinded's success relies on ANZ's partnerships with community organisations and individuals who are best-placed to deliver the program within vulnerable and disadvantaged communities.

In Australia, community professionals working in client facing roles within the not-for-profit sector are eligible to attend MoneyMinded Coach Training, delivered in person and virtually across the country. Accredited Coaches are provided access to resources to use with their clients free of charge.

This year, MoneyMinded in New Zealand was extended by partnering with budgeting providers to reach more communities in need.

In the Pacific, five new community partnerships were established – including three in Fiji and two in Timor Leste – to support the delivery of MoneyMinded.

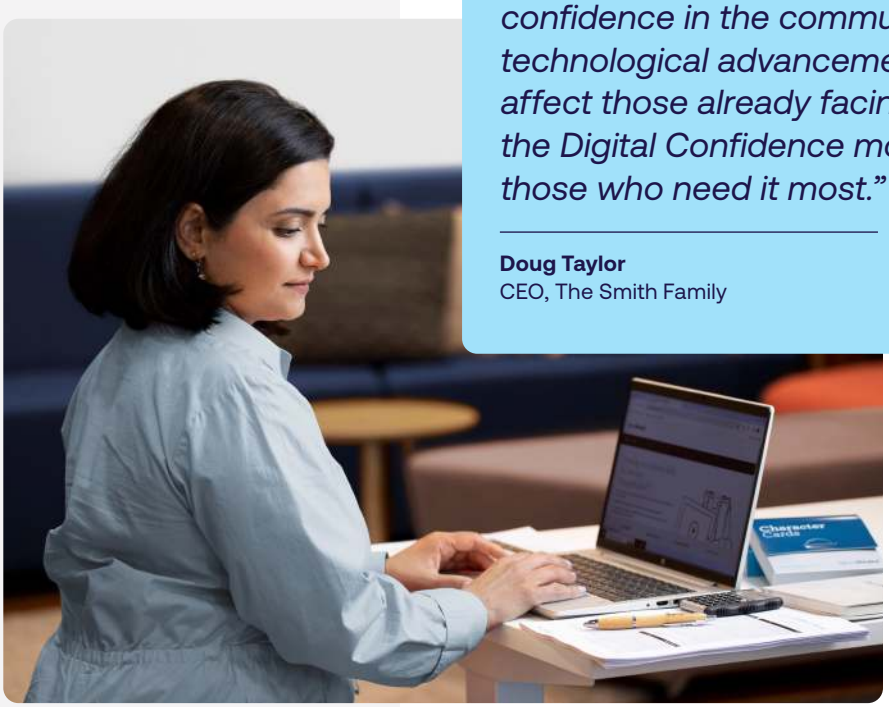
More than 1.1 million people have participated in ANZ's financial education programs, since 2002. 126,422 participated in the program this year, including 107,236 in Australia, 18,596 across Asia and the Pacific, and 590 in New Zealand. Feedback from Coaches and participants about the impact of MoneyMinded is available in our annual Impact Report at **anz.com/moneyminded.**

Building digital confidence

To further support vulnerable communities, new MoneyMinded content designed to build digital confidence and capability using digital devices was introduced this year. The Digital Confidence module starts with the basics of how to use a device and participate online safely and builds skills to engage with internet and mobile app banking.

"We are thrilled ANZ is taking steps to work with community partners to improve digital literacy and confidence in the community. We recognise that technological advancements can disproportionately affect those already facing financial challenges, and the Digital Confidence module will directly support those who need it most."

Doug Taylor
CEO, The Smith Family



In partnership with ANZ, The Smith Family is offering specialised training in this new module to all existing MoneyMinded Coaches as they begin to use the resources with their clients. For more information on how ANZ is supporting customers in need of extra care see pages 22-23.

MoneyBusiness in Australia

MoneyBusiness was developed in partnership with the Australian Government to build the money management skills and financial confidence of First Nations people in 2005.

In 2025, supported by the Australian Government Department of Social Services, ANZ partnered with Indigenous Consumer Assistance Network (ICAN), a First Nations training organisation to expand the reach of MoneyBusiness. During the year training was delivered across Australia including remote communities in Western Australia, South Australia and the Northern Territory.

MoneyBusiness Coach Training is a two-day program for community professionals working in First Nations communities. The strength-based training equips and prepares MoneyBusiness Coaches with practical tools and resources to use with their clients. "The training has given me valuable resources to use with participants and in my own personal life which will help with financial decision making and goal setting" said a recent MoneyBusiness Coach Training attendee.

This year

4,525

people completed the MoneyBusiness program

and

340

community professionals completed the Coach Training.

Saver Plus

Saver Plus is a matched savings and financial education program developed in 2003 by ANZ and the Brotherhood of St Laurence. Funded by ANZ and the Australian Government, Saver Plus is delivered in partnership with Berry Street, Brotherhood of St Laurence, and The Smith Family.

The Saver Plus program supports lower income earners to build a savings habit, access financial education and receive matched savings of up to $500 from ANZ to support their own, or their children's, education.

More than 4,000 Australians participated in Saver Plus this year, totalling approximately 66,700 since 2003 who have saved over $32.8 million and received more than $27.9 million in matched savings from ANZ for education costs.

More information about the impact of Saver Plus is available in our impact reports at **anz.com/saver-plus.**

Saver Plus in the Pacific

In 2024, ANZ set a target to pilot a savings program (Saver Plus) for people on lower incomes in Fiji and Vanuatu by the end of 2025, with at least 80% of participants having demonstrated a savings habit upon completion.

In Fiji, 60 participants consisting of market vendors and farmers that supply to the Suva, Nausori and Ba municipal markets, successfully completed the program, saving FJ$36,981 collectively, with ANZ contributing FJ$29,039 in matched savings. In Vanuatu, 28 participants collectively saved VT$1,572,529 with ANZ matching VT$701,200.

A Saver Plus pilot is also underway in the Solomon Islands, with 23 market vendors expected to complete the program in December 2025.

Suncorp Bank has also partnered with the Financial Basics Foundation since 2017 as part of their commitment to supporting young people and building up their financial confidence. More information is available at **suncorpbank.com.au/about-us/partnerships/financial-basics-foundation.html**

More information about ANZ's ESG targets can be found on pages 13-15. Further information on the launch of the Saver Plus pilot in Fiji and Vanuatu can be found on page 42. More information on financial wellbeing can be found at **anz.com/financialwellbeing**

Case study

Meet Jan, a domestic and family violence case worker

As a domestic and family violence case worker, Jan focuses on a range of issues such as child protection, safety planning, housing, risk assessments and building resilience.

Enabling individuals to regain financial independence is a core component of her role, and for the last three years Jan has integrated MoneyMinded for Family Violence – an extension of MoneyMinded introduced in 2016 – into the programs she facilitates.

"For many clients, it is challenging to start over, particularly if they haven't had access to finances within their relationship" she explains. "The MoneyMinded program creates a more comprehensive, sustainable framework for supporting clients in regaining financial control, sometimes for the very first time".

Jan emphasises the importance of planning for the future. "It not only helps people address immediate financial needs but also equips survivors with the skills they need to navigate their financial futures with confidence and independence. The program is adaptable to suit each client, and I feel this makes it a lot easier to utilise".

Berry Street Yooralla trains family violence specialists in MoneyMinded for Family Violence, which includes a specific range of resources to support community professionals having conversations about financial abuse with their clients.

Suitable and affordable housing

Material ESG issue

Housing continues to be a key focus of the community across Australia and New Zealand, including challenges associated with the cost of living and housing affordability and availability.

We have continued to focus on helping improve the availability of suitable and affordable housing options for all Australians and New Zealanders by:

- Increasing overall housing supply, including both new social and affordable, into the market;
- Supporting new housing models from pilot to scale to delivery of new pipelines; and
- Contributing funding solutions for first home buyers, specialist disability accommodation and land lease communities.

Our approach

In 2018, ANZ set a target to fund and facilitate $1 billion in housing investments by 2023[1]. After surpassing this objective in 2020, the target was extended. Today, ANZ's target is to fund and facilitate at least $10 billion of investment by end 2030 to deliver homes to buy and rent that are more affordable, accessible or sustainable.

Since 2018, ANZ has invested $7.37 billion in the housing sector, with $892.79 million invested in 2025, highlighting our ongoing lending to the housing sector to deliver more residential outcomes and to support customers into their own homes.

The target aims to increase housing supply with a direct focus on emerging markets, innovative models and scalable projects. Specifically, projects under the target demonstrate how financial institutions can play their part in changing the market to deliver more of the right housing, in the right locations, at the right price point for both rental and purchase.

Projects that have contributed toward the target this year include social and affordable housing delivered in conjunction with partners such as Tetris Capital and Community Housing Ltd; continued growth of the leading players in the Specialist Disability Accommodation (SDA) sector and the affordable seniors living space.

ANZ continues to engage with key stakeholders across all three levels of government to provide financial insights to support housing policy and programs, alongside offering expertise to community and customers.

For more information on how ANZ is helping to improve the availability of suitable and affordable housing visit **anz.com/housing**

Key actions in 2025

$1 billion invested in Queensland

A key delivery area this year has been supporting housing outcomes across Queensland. Overall, ANZ has funded over $1 billion of housing outcomes since 2023.

Funding this year included:

- More than $800 million to support the Queensland Government through their Housing Investment Fund (HIF), including the construction of 156 social and affordable dwellings in Greater Brisbane, and 313 social and affordable homes in partnership with Community Housing Limited Queensland across Brisbane and regional Queensland. In total, we have delivered 1,443 homes to support this initiative.
- Over $96 million of lending to support SDA housing outcomes across Queensland.
- Approximately$165 million of lending to deliver affordable seniors living outcomes.

1. Explanatory note for the $10 billion target is available on page 55.



Render image of affordable apartment homes in Rivervale, Western Australia Source: Tetris Capital

Backing growth in the Specialist Disability Accommodation (SDA) market

ANZ has been a leading financier in the SDA sector since 2018, providing over $700 million in funding to support partners such as:

- Enliven Housing Group – housing that is sustainable, safe and supported by person-centred tenancy management services Australia-wide.
- The Synergis Fund – one of Australia's first wholesale investment funds aimed at transforming the disability housing sector.
- Sana Living – expanding opportunities for independence, connection to community and achievement of individual goals across Western Australia, Queensland and South Australia.
- Australian Unity – investing in social infrastructure and sustainable communities to support wellbeing.

ANZ has also been an active supporter of PowerHousing's SDA Community of Practice and as a member of the Specialist Disability Accommodation Alliance to ensure there are clear policies in place to support institutional investment in the sector.

Community housing in New Zealand

As part of our $10 billion target, ANZ Bank New Zealand provided a NZ$150 million lending facility this year, subsequently matched by the Government to the Community Housing Funding Agency (CHFA), supporting affordable housing finance for community housing providers across the country. In addition, ANZ acted as sole sustainability coordinator to establish CHFA's Social Finance Framework and sole lead manager for its inaugural NZ$200 million social bond issue.

ANZ Community Foundation housing grants

This year, the ANZ Community Foundation provided grants to not-for-profits supporting vulnerable Australians and those at risk of homelessness, including:

- Disability accommodation – YoungCare At Home Care Grants Program (QLD)
- Support for young people – Stepping Stone House Independent Living Program (NSW) and Conscious Creative HoMie Pathway Alliance (VIC)
- Aboriginal led housing design – Wilya Ajjul Janta Aboriginal Corporation (NT)
- Transitional housing to at-risk young mothers – The Lady Musgrave Trust Logan Housing Project (QLD)
- Supporting better rental outcomes – Anika Legal Ltd Eviction Support Service (VIC) and Goldfields Community Legal Centre Inc Tidy Tenant Project (WA)

For more information on ANZ's community giving see page 53.

Affordable and sustainable housing in New Zealand

In 2025, ANZ Bank New Zealand continued to support New Zealanders aiming to reduce emissions and improve the environmental sustainability of their homes through the 'Good Energy Home Loan' and 'Healthy Home Loan Package' products. More information on these products is available at **anz.co.nz/good-energy**.

This year, we exceeded our target to help New Zealand homeowners improve the sustainability of their homes and/or reduce their transport emissions through discounted lending of at least NZ$825 million in aggregate to at least 19,700 households by end 2025. For information on the performance of this target, and ANZ's other ESG targets, see pages 13-15.

ANZ Bank New Zealand offers lending products that may support households and businesses to transition to a lower emissions economy. For more information see page 17 in the 2025 Climate Report available at **anz.com/esgreport**

Fraud and scams

Material ESG issue

In recent years scams have evolved rapidly and become increasingly sophisticated. To keep our customers' money safe, we continually review and adjust our capabilities and educate customers and employees on new fraud and scams as they emerge. We safeguard the confidentiality, integrity and availability of our systems, services and information to ensure operational success, business growth and our customers' financial wellbeing.

In 2025, our Customer Protection teams investigated more than 39,000 scam cases and prevented and recovered more than $220 million in fraud and scams-related funds across Australia and New Zealand.[1]

Our approach

ANZ is committed to minimising the harm caused by fraud and scams to our customers, shareholders, employees, and to the wider community. ANZ's Anti-Fraud Policy and Standard sets the minimum requirements for the prevention, detection, investigation and reporting of fraud and scams.

Scams education customer referral pathway

This year, ANZ's financial education program MoneyMinded, established a customer referral pathway for repeat and entrenched scams victims to access a free scams financial education workshop.

Delivered in partnership with the Brotherhood of St Laurence, scams victims are referred to a free facilitated workshop which outlines how to identify and protect yourself from various types of scams, including investment, dating, phishing, remote access, and employment scams.

The education workshops follow the launch of a Scams module in 2024, which is available to all MoneyMinded Coaches. More information on ANZ's financial education programs can be found on pages 30-31.

Australia[2] – Key actions in 2025

We continued to apply friction to transactions by delaying the payment process for high-risk transactions. We also broadened our fraud and scams detection and prevention capability in response to increasingly sophisticated cybercrime threats by implementing the following detection and prevention measures.

Industry collaboration

Partnered with other banks to deliver BioCatch Trust[3], an inter-bank financial crime intelligence sharing network. This provides an additional layer of protection against fraud and scams, by assessing in real-time the potential risk of every receiving account on the network, before a payment is processed. BioCatch Trust indicators have been integrated into our Falcon fraud detection platform, which has significantly enhanced our ability to detect complex scam typologies while reducing friction for legitimate customers. This initiative builds on our existing collaboration with other banks, which involves sharing fraud and scams intelligence through the Australian Government's intel loop and the Australian Financial Crimes Exchange.

Confirmation of Payee

Launched Confirmation of Payee across our ANZ banking platforms, a name matching tool designed to help protect customers from scams and mistaken payments. The service confirms whether the account name matches the details held by the receiving bank. Since the tool went live in June 2025, ANZ has seen over 200,000 payments abandoned by customers after being presented with a mismatch result.

CallSafe

Launched CallSafe, a feature designed to help protect ANZ Plus customers from falling victim to bank impersonation scams. CallSafe offers secure authentication, enabling customers to verify they are speaking to an ANZ employee, and for employees to authenticate the customer's identity. Since this feature went live in November 2024, CallSafe has been used to securely authenticate customers more than 40,000 times.

Digital Padlock

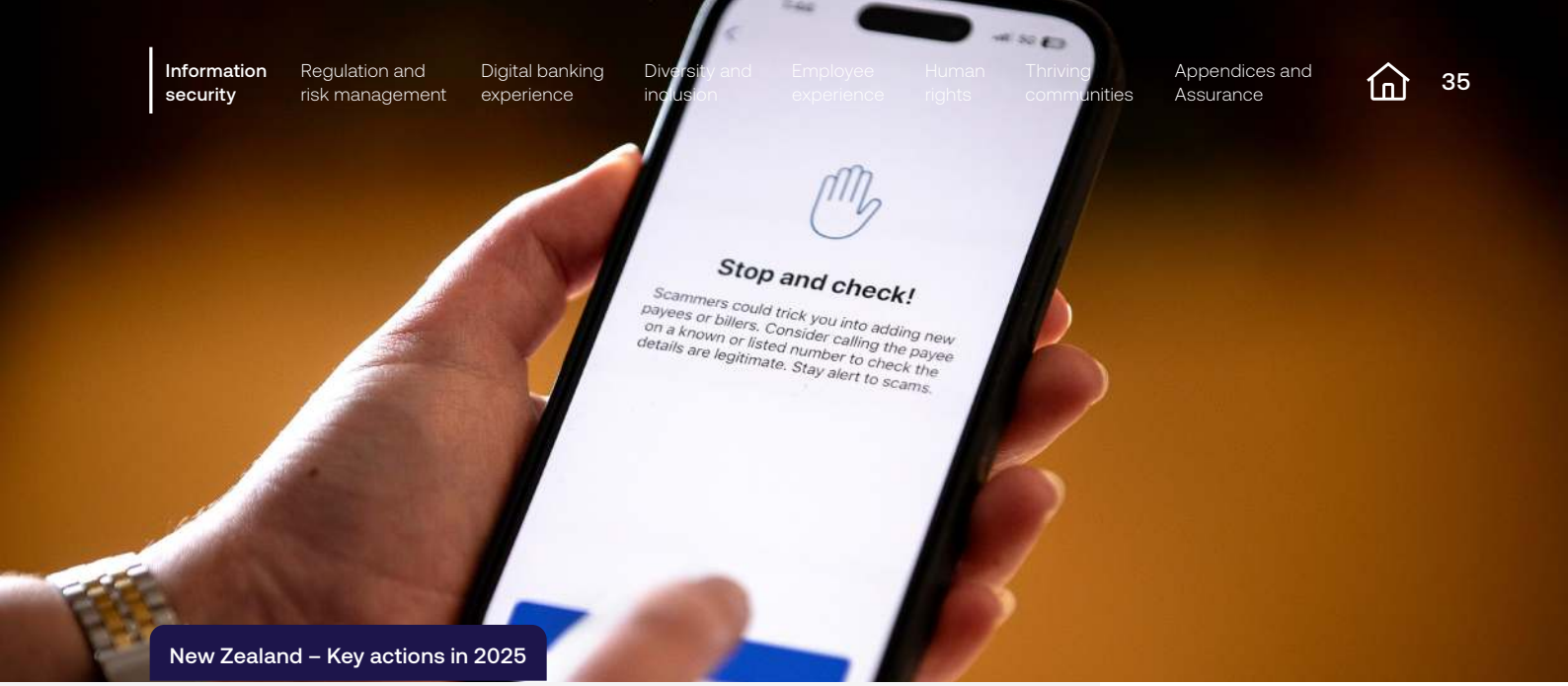
Implemented Digital Padlock, an Australian-first fraud and scams feature that provides ANZ customers with the ability to instantly 'lock down' access to their accounts if they suspect they are being targeted by cybercriminals.

In February 2025, the Australian Government passed the Scams Prevention Framework (SPF), setting out a series of general principles that will apply to regulated sectors. Broadly, the framework introduces obligations for banks to detect, prevent, and disrupt scams.

The SPF will be supported by sector specific Codes that will detail the steps that each sector can take to comply with the legislation's principles.

We have commenced work to understand what changes are required to meet the new obligations.

1. Includes ANZ Plus, ANZ Classic, ANZ Bank New Zealand, and Suncorp Bank. **2.** Excludes Suncorp Bank. **3.** Includes Suncorp Bank.



New Zealand – Key actions in 2025

This year, ANZ Bank New Zealand implemented several new detection and prevention measures as well as taking part in industry initiatives to help protect customers and the community from scams and other financial crimes.

Industry collaboration

ANZ Bank New Zealand is part of the new Anti-Scam Alliance, a cross-sector initiative launched to improve New Zealand's ability to prevent and respond to online financial scams. The alliance brings together government agencies, banks, telecommunications providers, digital platforms, and consumer groups to coordinate efforts and enhance consumer protection.

In April 2025, ANZ Bank New Zealand, along with the New Zealand banking industry, agreed to deliver a suite of consumer protections. The protections have been progressively rolled out across New Zealand and will conclude in November 2025.

The consumer protections will include:

- **Pre-transaction warnings** to customers for certain payments.
- **Confirmation of Payee**, a service that confirms whether the account name matches the details held by the receiving bank. Since November 2024 over 17.7 million checks have been completed.
- **Identification of and response to high-risk transactions** or unusual account transaction activity, and the ability to delay or block transactions in some cases.
- Providing a **24/7 reporting channel** for customers who think they've been scammed and responding to protect accounts.
- **Sharing scammer account information** with other banks to help prevent criminal activity, and freezing funds where appropriate.

Behavioural Biometrics

During the year ANZ Bank New Zealand introduced behavioural biometrics, a technology that identifies patterns in the way customers use the goMoney and Internet banking channels. This helps to identify when scammers are attempting to take over customer accounts. Since implementation in June 2025, the technology has saved ANZ Bank New Zealand customers over NZ$1.2 million.

Enhanced fraud detection capabilities

Investment in analytical resources and capability has lifted ANZ Bank New Zealand's ability to identify changes in attack methods by scammers, enabling a reduction in card fraud transactions by 28% for the 12 months ending in September 2025, compared to the 12 months ending September 2024.

goMoney App

To strengthen customer capability in detecting scams, we've delivered over 7.9 million scams education messages via email and the goMoney App, reinforced by targeted communications. This included promoting the Digital Security Code (DSC), a security code available in the goMoney App that changes every 12 hours instead of using the security code at the back of the physical card. In September 2025, DSC made up 7.8% of transactions. For the first six months since implementation, fraud rates are half of those of static verification methods.

More information on how ANZ Bank New Zealand is helping to protect customers from fraud and scams is available at **anz.co.nz/fraudprotection**

Cyber security

Material ESG issue

Cyber security is a strategic priority for every organisation. In a hyperconnected world, resilience is a new currency of trust – customers, partners, and regulators aren't just asking if companies are secure, but if they're ready.

Our approach

Cyber security is central to ANZ's operations.[1] It safeguards customer data, ensures regulatory compliance, and supports innovation, all of which are crucial to maintaining trust and resilience in today's digital banking environment.

Our Enterprise Security Strategy is guided by three key objectives: enabling transformation, strengthening resilience, and embedding security. Each objective is supported by key priorities, including:

- Ensuring ANZ can confidently move into new areas of growth by creating a secure, flexible environment for our customers, employees, and partners to do business – anytime, anywhere.
- Advancing ANZ's readiness to rapidly detect, respond and recover from a major cyber-attack.
- Minimising the likelihood and consequence of a cyber-attack.

Progress against each objective is systematically tracked and reported through annual key results, providing visibility into execution and measures of success. The strategy is underpinned by threat mapping, industry benchmarking, penetration testing (the simulation of attacks to identify system vulnerabilities) and risk evaluation.

The strategy also identifies opportunities to harness and address new threats introduced by evolving technologies such as artificial intelligence and quantum computing. This enables ANZ to adapt safely to new technologies, whilst fostering everyday habits that safeguard employees and customers.

ANZ has a Group Information Security Policy[2] and Standards which outline the mandatory security requirements and responsibilities across ANZ. Cyber security updates are provided to the Board Risk Committee and Board Digital Business and Technology Committee on a regular basis.

Training

Education is key to building a security-focused culture. Educating employees starts with a clear, shared understanding of our security operating model, enabling everyone to contribute to protecting ANZ and our customers.

We maintain a strong emphasis on embedding security behaviours across all divisions, leveraging security metrics and data-driven insights. Key behaviours are evaluated through our internally developed Security Behaviour Index (SBI)[3]. We have established a network of experts which includes over 100 divisional Security Behaviour Index representatives, an increase of 37% since 2024.

We also aim to enhance cyber resilience and phishing awareness through more frequent, intelligence-led exercises. In 2025, we conducted seven cyber exercises, including a Group wide exercise. These exercises strengthen our readiness by clarifying roles, validating crisis response plans, and supporting effective decision-making under pressure.

All contractors are required to complete annual cyber security training to ensure awareness of their responsibilities. This includes specialised instruction tailored for frontline personnel, software developers and engineers.

Customers and third parties

With a growing prevalence of cyber threats, protecting our customers is more vital than ever. Our customer security education service encompasses tailored cyber security content, direct business engagements, strategic education partnerships, and active industry collaboration.

Continued uplift to ANZ's Security Hub in 2025 saw new and refreshed content provided to enhance customer understanding of common scam types and cyber threats. These resources were further reinforced through personalised security awareness campaigns with ANZ successfully engaging over 4.4 million customers[1].

Third-party providers handling sensitive ANZ information must meet strict security standards. ANZ supports this through a robust governance framework and a mature security testing program aligned with Australian Prudential Regulation Authority (APRA) CPS 234.

1. Excludes Suncorp Bank. **2.** This policy applies to Suncorp Bank. They have also retained their Security Management Policy.
3. Provides an indication of how well our employees are fulfilling their security obligations.

Data protection and privacy

Material ESG issue

Robust data protection and privacy practices underpin trust in the digital economy. In an increasingly data-driven society, strong governance supports regulatory compliance.

Our approach[1]

At ANZ, safeguarding personal information is essential to maintaining the trust of our customers, shareholders, employees and the communities we serve. We continue to focus on delivering long-term value through robust privacy and data protection practices, which are supported by strong governance, regulatory compliance, and a culture of accountability.

Our practices, procedures, and systems provide a framework for ANZ to identify and control privacy risks in line with legal obligations and handle personal information responsibly. ANZ's Privacy Policy[2] also provides clear expectations to help build trust with customers, employees and stakeholders by demonstrating a commitment to protecting privacy.

Oversight is provided through regular reporting with privacy events reported to the Operational Risk Executive Committee and the Board Digital Business and Technology Committee when required.

Training

We recognise that our people play a critical role in protecting personal information. To support this, in 2025 we developed an ANZ wide Privacy, Data Protection and Ethics Essentials mandatory learning course to ensure a consistent learning experience for employees across multiple markets.

We continue to foster a speak up culture that encourages our people to report suspected or actual data issues. These issues can be raised internally via the Non-Financial Risk Hub or directly to the Privacy Office.

Notifiable data breaches

In 2025, ANZ Group reported four data breaches across the markets we operate in, under our data breach reporting obligations. One incident was reported to the Office of the Australian Information Commissioner (OAIC) and involved the notification to a single impacted individual under the Notifiable Data Breach Scheme (Scheme). ANZ Bank New Zealand reported three notifiable privacy breaches under their Privacy Act to the Office of the Privacy Commissioner (OPC), involving statutory notification to four impacted individuals.

Suncorp Bank has continued to retain its Privacy Policy since ANZ's acquisition on 31 July 2024, with a focus on uplifting capability in alignment with the Australian Privacy Act reforms. No notifiable data breaches from Suncorp Bank were reported to the OAIC under the Scheme in 2025.

Key actions in 2025

- ANZ has established a dedicated program with a cross-functional working group to prepare for tranche 1 of the Privacy Act reforms which came into effect in December 2024. A significant scope of work in this program relates to the use of Automated Decision Making.
- Streamlined our Privacy Impact Assessment to ensure consistency across ANZ markets in the identification and mitigation of privacy risks.
- Continued to promote and raise awareness with employees of the importance of data protection and privacy through Privacy Awareness Week, an initiative led by the Australian Government's Office of the Australian Information Commissioner (OAIC). This year's theme, "Privacy – it's everyone's business," emphasised the shared responsibility of protecting personal information across the markets in which ANZ operates.

Further information on privacy at ANZ, including our Privacy Policy, is available at **anz.com/privacy**

1. Excludes Suncorp Bank. **2.** Suncorp Bank has retained their Privacy Policy.

Financial crime

Material ESG issue

We maintain a strong focus on financial crime prevention, detection and disruption by continually reviewing ANZ's Anti-Money Laundering / Counter-Terrorism Financing (AML/ CTF), Sanctions, Anti-Bribery and Anti-Corruption (ABAC) programs, and ongoing platform upgrades to improve our ability to collaborate with external parties to fight financial crime, including a long standing relationship with the Australian Federal Police (AFP).

Our approach

Anti-Money Laundering and Counter-Terrorism Financing

Our AML/CTF program and Policy Summary[1] summarises 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.

We complete customer due diligence proportionate to the ML/TF risk posed by our customers. We seek to identify unusual or suspicious transactions, activities and/or behaviours through a combination of transaction monitoring and other methods of observation, reporting suspicious activity to appropriate authorities.

Australia's AML/CTF laws are in the process of being updated to modernise and expand its oversight to additional higher risk services. These reforms come into effect on 31 March 2026 for existing reporting entities, including ANZ. These changes impact policies and processes relating to AML/CTF Programs, risk assessments, customer due diligence and reporting obligations.

Sanctions compliance

Our sanctions compliance program and Policy Summary[1] outline our Group's approach to identifying and managing sanctions risks globally.

Customer relationships and activities that pose a higher sanctions risk are subject to enhanced due diligence measures, monitoring and approval. We continue to enhance transaction monitoring and strengthen customer due diligence to ensure compliance and support business within our risk appetite.

Anti-Bribery and Anti-Corruption (ABAC)

Our ABAC Business Integrity Policy[2] outlines the standard of behaviour we expect from our employees and third parties in all countries that ANZ operates in. The underlying principles and conduct provisions include knowing who we are doing business with, doing business with integrity, and ensuring transparency in our relationships.

This is supported by procedural standards to identify and mitigate higher risk third parties, conflicts arising from the exchanges of gifts and entertainment, and ensure our dealings with public officials are appropriately managed. The policy requirements are operationalised through centralised technology platforms to support the management of risks and provide visibility of bribery and corruption risk across ANZ.

Partnerships and programs

To help protect vulnerable communities and reduce harm through strategic private-public collaboration. For ANZBGL[3], this includes with the Australian Transaction Reports and Analysis Centre (AUSTRAC) Fintel Alliance and strengthened engagement with the AFP, including the Joint Policing Cybercrime Coordination Centre (JPC3) and the Australian Centre to Counter Child Exploitation (ACCCE).

Through these programs we embed intelligence specialists and deploy security-cleared employees to law enforcement and regulatory agencies, directly supporting initiatives focused on dismantling child sexual abuse networks, identifying modern slavery, human trafficking, dismantling groups seeking to defraud and scam our customers and developing financial intelligence tools and algorithms that detect criminal patterns targeting vulnerable individuals.

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

Training

Our employees and contractors are required to undertake mandatory annual training to ensure they understand their role in preventing financial crime. This year, 99.93% of employees and contractors completed the training. Additional training is also tailored for specific roles and we offer additional educational content and hold ABAC awareness sessions to continue to promote our operating standards.

The ANZ policies mentioned above are available at **anz.com/corporategovernance**

Suncorp Bank has continued to maintain its own Anti-Money Laundering and Counter Terrorism Financing Policy. For a full list of Suncorp Bank[4] policies, see page 2.

Suncorp Bank remains focused on maturing its AML/CTF systems and controls. To ensure a strategic and holistic approach, Suncorp Bank management established a Financial Crime Compliance Program of Action (FCCPoA). The FCCPoA incorporated the actions arising from AUSTRAC's AML/CTF Compliance Assessment Report findings in relation to the Company's AML/CTF Program as well as findings and recommendations from internal assurance and audit work. The Program is now well advanced and completion is expected during the FY26 financial year.

1. Excludes Suncorp Bank. **2.** Includes Suncorp Bank. **3.** ANZBGL means Australia and New Zealand Banking Group Limited. **4.** Suncorp Bank was acquired by ANZ on 31 July 2024. 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.

Social and environmental risk management

Material ESG issue

Social and environmental risks arising from transactions, projects and customer relationships can affect society, human rights, environments and associated communities. We have a responsibility to manage social and environmental risks for the benefit of our people, customers, communities, and shareholders.

Our approach

Social and Environmental Risk

ANZ Bank Group assesses and manages potential social and environmental impacts of our lending decisions to large business customers[1] through the application of our Social and Environmental Risk Policy (S&E Risk Policy), Social and Environmental Risk Standard (including specific requirements for 'sensitive sectors'), and Climate Risk Standard.[2] The Policy and Standards apply to ANZ Bank Group excluding Suncorp Bank.[3]

Our S&E Risk Policy outlines ANZ Bank Group's approach to the management and mitigation of social and environmental risks arising from large business customer activities, including the impacts of climate and nature risks. It is applied to other customers where ANZ perceives that a customer or their activities may have a material impact and is otherwise used to guide decision-making.

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 the protection of culturally or environmentally sensitive areas. ANZ will not tolerate land acquisition and involuntary resettlement that we consider improper. The core requirements apply to decisions relating to large business customers, in addition to the requirements specific to certain 'sensitive sectors' (listed below).

- **Energy Industry**
- **Extractives Industry**
- **Land and Forest Management**
- **Water Management**
- **Military Equipment**

More than one set of sensitive sector requirements may apply to the same customer/activity under consideration.

Our Climate Risk Standard is principles-based and seeks to provide a consistent approach to identifying, assessing, and managing climate risk. This includes key elements taken into consideration when making decisions that may result in actual or potential climate risks and impacts to our customers or ANZ. The Standard includes requirements relating to:

- Acting in accordance with our S&E Risk Policy, Climate and Environment Strategy and Climate Change Commitment,
- Identifying, assessing and managing climate risks in our lending portfolios and capital markets activity, and
- Monitoring and reporting of potential climate risks and impacts to relevant forums and committees see pages 7-9.

For more information on our approach to deforestation see page 19 in the 2025 Climate Report available at **anz.com/esgreport**

1. Customers' of ANZ's Institutional division where ANZ has a credit exposure. **2.** Summaries available here: **anz.com/social-and-environmental-risk-management**. **3.** 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.

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 environment and social risks.

Our 2025 Climate Report, available at **anz.com/esgreport**, sets out in more detail additional tools and process that are focused on identifying, assessing, and managing climate risks.

Tools	Description	Customer Cohort
Social and Environmental Screening Tool	A tool used to facilitate qualitative risk assessments of social and environmental risks, including impacts of climate change, that may result in potential financial and/or non-financial risks to ANZ Bank Group from our Institutional customers' activities. It also assists bankers in the application of the S&E Risk Policy and the S&E Risk Standard. This assessment is ordinarily performed when conducting due diligence on new to bank[1] customers, when reviewing existing customers (at least annually), or prior to a material transaction, or when ANZ Bank Group becomes aware of: • a material change to the customer's activities, or • a material impact occurring.	Customers within ANZ's Institutional division (our large business customers)
Enhanced Human Rights Due Diligence	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. For further information on our approach to human rights see page 52.	Large business customers of ANZ's Institutional division, when identified through our Social and Environmental Risk Screening Tool
Equator Principles	A risk management framework that determines, assesses, and manages social and environmental risks when financing large infrastructure and industrial projects. More information on the Equator Principles is available at **anz.com/about-us/esg/policies-practices/equator-principles**	Project financing or export finance provided to ANZ's Institutional customers

1. Customer 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.

Equator Principles

Case studies

Affordable housing in eastern Australia

ANZ acted as the sole Mandated Lead Arranger, Underwriter and Bookrunner in the provision of financing for the construction, operation and maintenance of affordable housing in eastern Australia. The project will provide over 400 affordable dwellings across key growth suburbs aimed at young families, as well as key workers and senior citizens. An EP Due Diligence (DD) assessment was undertaken by an independent technical advisor as part of the environmental impact due diligence for the project. As an affordable housing project based within a high-income Organisation for Economic Co-operation and Development (OECD) country, it was classified as a Category C project, with minimal negative impact on the social, economic or ecological status of the site and surrounding areas.

Public health facility in eastern Australia

ANZ acted as a Mandated Lead Arranger, and joint Sustainability Loan Co-ordinator on a sustainability loan facility for the construction, and operation, of a public health facility in eastern Australia. This health facility is designed to address the lack of acute health services in the catchment area. As part of our due diligence process for the project, an EP DD assessment was undertaken by an independent technical advisor on behalf of the lenders. The facility was classified as a Category B project, with limited adverse environmental and social risks.

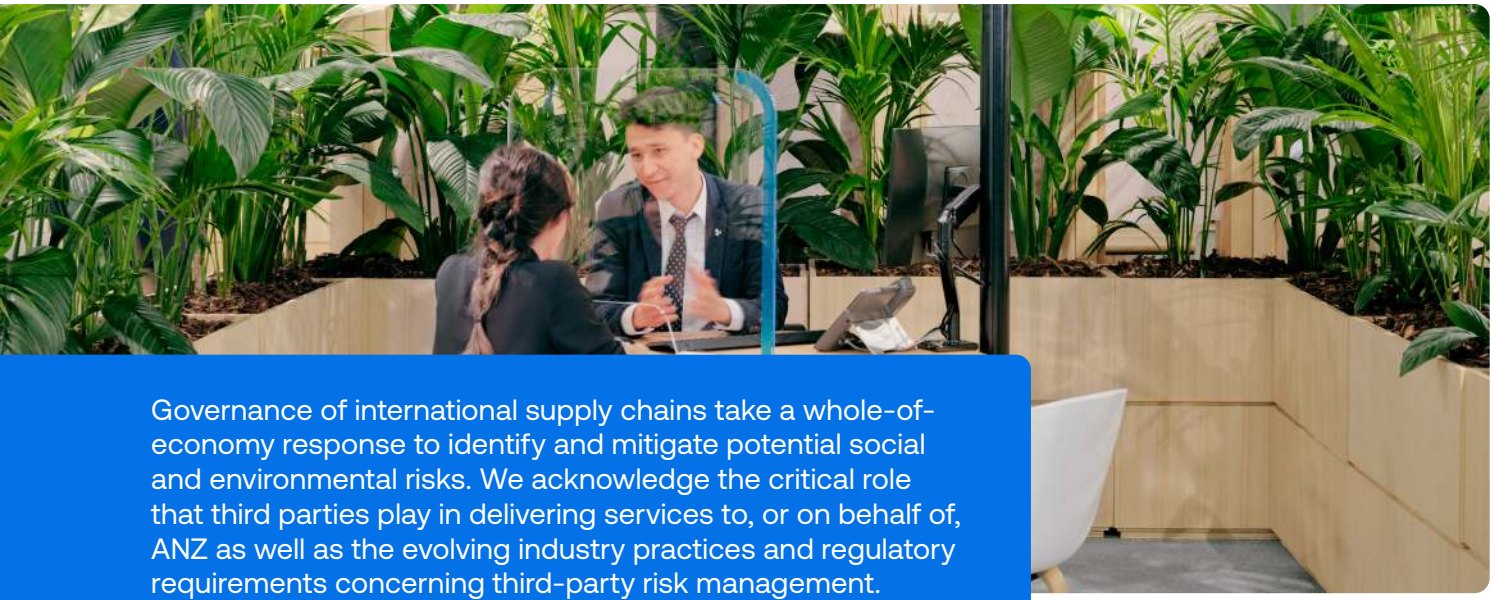
Solar project in southern USA

ANZ acted as Joint Lead Arranger, and Green Loan Co-Ordinator, for a 300MW solar project in the USA. This project will support the power grid in the region, as well as commercial operations in the area. As part of our due diligence process for the project, an EP DD assessment was undertaken by an independent technical advisor on behalf of the lenders. The solar project was classified as a Category B project, with limited adverse environmental and social risks. The project is sited on agricultural land, however, the size of the disturbance and change in land use and mitigation are expected to have limited adverse environmental and social impacts.

Further information on the Equator Principles categories and this year's Equator Principles transactions is available in our 2025 ESG Data and Frameworks Pack available at **anz.com/esgreport**

Managing ESG risks and opportunities in our supply chain

Material ESG issue



Governance of international supply chains take a whole-of-economy response to identify and mitigate potential social and environmental risks. We acknowledge the critical role that 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 approach

Our Supplier Code of Practice (SCOP) outlines minimum expectations for suppliers on topics such as human rights, ethical business practices and environmental management.

In 2025, through our Third-Party Risk Management (TPRM) program, ANZ continued the implementation of a new centralised solution, framework[2] and policy.This is enabling 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 also includes the ongoing management and monitoring of third-party risks, in line with our risk management and compliance policies.

Outcomes

This year, ANZ spent $5.8 billion[1] ($5.1 billion in 2024) with suppliers, with 90% of this spent in Australia and New Zealand.

Supplier screening

Contracted suppliers are screened as part of ongoing due diligence using a thirdparty tool to assess performance against 28 ESG themes. In 2025, 4,099 checks were conducted (2024: 5,311 checks), including our top 100 suppliers by spend. The reduction in checks this year is due to a change in methodology and reduced supplier base. Checks identified potential issues in six instances, with ANZ working with these suppliers to understand the issues and mitigation actions taken.

Supplier Code of Practice

We include SCOP clauses in new and renewed supplier contracts with 83% of all live supply contracts including the SCOP clauses. We expect suppliers conduct their business in accordance with these expectations.

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

Supporting supplier diversity

In 2025, our engagement of certified Indigenous businesses increased, predominantly in our Property and Technology business units. This year, we spent $22.9 million (2024: $13.4 million) with First Nations businesses and $16.6 million (2024: $6.6 million) with social enterprises in Australia. This includes with one supplier which is certified as both an Indigenous business and a social enterprise.

In New Zealand, we became buyer members of Amotai to support future procurement opportunities with Māori and Pasifika owned businesses.

1. Numbers on this page are presented on a cash expenditure basis and also include Suncorp Bank from 31 July 2024 to 30 September 2024. Suncorp Bank is included for 2025. **2.** The framework provides the foundation and arrangements that will help embed the right behaviours, processes and practices for managing third-party risk at ANZ. It provides a structured approach to managing third party risk in an effective and consistent manner to minimise the impact of adverse events and maximise the right outcome for all stakeholders.

Banking in the Pacific

Foundational ESG issue

With a legacy spanning over 140 years, ANZ's presence in the Pacific reflects our steadfast focus on advancing regional prosperity. Today, we operate in eight markets across the Pacific: Fiji, Samoa, Tonga, Vanuatu, the Solomon Islands, Kiribati, the Cook Islands and Timor Leste and hold the most extensive footprint of any bank in the region. We also have a substantial presence in Papua New Guinea, which plays an important role within our Institutional business.

Our approach

In 2025, ANZ's commitment to the region was further reinforced through the signing of an agreement with the Australian Government, who will provide a limited $2 billion guarantee to ANZ in connection with its Pacific operations including Papua New Guinea for 10 years.

This arrangement highlights our shared commitment to providing access to safe, trusted banking services in the Pacific. As part of the arrangement, ANZ will invest a further $50 million in our Pacific banking systems to enhance our digital banking offering and support ongoing operations in the region.

Uplifting digital banking

Uplifting digital banking usage through the ANZ Pacific App and our Internet Banking platform, continues to be a key pillar of ANZ's financial accessibility strategy in the Pacific.

Kiribati, the most remote location in ANZ's international network, alongside Tonga, an economy with heavy dependence on remittances from members of the population who live abroad, are leading examples of smaller island nations embracing digital banking. In 2025, both Kiribati and Tonga grew their ANZ Pacific App adoption rates to 68% (an increase from 55% in 2024) and 54% (an increase from 38% in 2024) respectively.

The Cook Islands continue to lead the Pacific in digital banking adoption, with the proportion of customers using Internet Banking rising to 81% in 2025, (an increase from 76% in 2024).

More broadly across the region, digital adoption continues to grow. 60% of customers (an increase from 53% in 2024) across Fiji, Samoa, Vanuatu, Cook Islands, Tonga, Solomon Islands and Kiribati now use the ANZ Pacific App, with 71% of customers using Internet Banking (an increase from 65% in 2024). This reflects more than technological progress, it represents increased access, empowerment and resilience. It shows nations adopting digital solutions to pay and receive money.

Financial literacy and community empowerment

At ANZ, we believe that financial wellbeing is foundational to thriving communities and financial literacy remains central to ANZ's social impact in the Pacific and Papua New Guinea. In 2025, our flagship program, MoneyMinded, reached over 15,000 individuals across the region.

In 2025, we also expanded our matched savings initiative, Saver Plus, through pilot programs in Fiji, Vanuatu, and the Solomon Islands. ANZ partnered with the United Nations Development Programme and United Nations Women's Markets for Change project to support market vendors and farmers. The Fiji and Vanuatu pilots have successfully concluded, and the Solomon Islands pilot is due for completion in late calendar year 2025.

While participants in the Fiji program collectively saved FJ$36,981 and participants in the Vanuatu program collectively saved VT$1,572,529, with ANZ matching FJ$29,039 and VT$701,200, the impact extends beyond the financial metrics. By the completion of these programs, participants:

- had developed an ongoing savings habit (90% in Fiji and 85% in Vanuatu);
- felt better equipped to plan their financial future (87% in Fiji and 82% in Vanuatu); and
- reported improved confidence in managing their businesses and supporting their families (90% in Fiji and 80% in Vanuatu).

Following the success of the Saver Plus pilot, ANZ has committed to continuing the program in Fiji and Vanuatu, reinforcing the focus on practical solutions that reduce poverty and empower underserved communities.

Key actions in 2025

In a region where connectivity remains a challenge, ANZ is helping local businesses overcome barriers to digital participation through a strategic partnership with the Market Development Facility (MDF), an Australian Government-funded multi-country initiative, implemented by Palladium, in partnership with Swisscontact.

This initiative, which commenced in 2025, supports entrepreneurs in Tonga by helping them integrate ANZ eGate, our international payment gateway, into their websites, enabling them to grow their business and expand their reach to global markets.

ANZ refers eligible participants to Palladium, who connect them with web development experts, to provide website integration and maintenance, at little to no cost.

For more information on MoneyMinded and Saver Plus see pages 30-31

Diversity and inclusion

Foundational ESG issue

A diverse workforce and inclusive culture improve the quality of decision making and drive innovation, making us a better bank for our customers.

Our approach

ANZ has a Diversity and Inclusion Policy[1] which sets out how we are building a diverse workforce which reflects the communities in which we operate, harnesses the unique capabilities and perspectives of our people, and leverages this diversity of thought through an inclusive workplace which values every voice.

Our five Diversity and Inclusion strategic priorities are:

- Create an inclusive culture and improve the experience of our employees who represent all dimensions of diversity.
- Build confidence and capability of people leaders to lead diverse and inclusive teams.
- Improve the diversity of our leadership population.
- Strengthen and empower our employee networks.
- Improve accountability and governance.

Our employee networks: creating an inclusive culture

Our employee networks continue to play a significant role in shaping our inclusive culture. The networks represent our diverse workforce including Abilities, Reconciliation, Mental Health, Cultural Inclusion, ForWARD (gender equality), Pride and Wired Differently.

Representatives of our Abilities and Reconciliation networks sit on the governance groups of the Accessibility and Inclusion Plan and Reconciliation Action Plan[2] respectively, highlighting the importance of their lived experience.

Employment programs

We also continued to run a range of employment programs designed to increase the diversity of our workforce. These included Indigenous traineeships, summer internships, graduate programs, the ANZ Spectrum Program, and the Given the Chance program which is run in collaboration with the Brotherhood of St Laurence.

Equity, diversity and inclusion in New Zealand

ANZ Bank New Zealand continued to embed its refreshed Equity, Diversity and Inclusion (EDI) Plan during the year, developed to reflect the evolving demographic landscape of New Zealand. The plan reinforces our commitment to cultivating a workplace where everyone feels valued, respected and empowered to thrive.

01. Inclusive leadership

Strengthening leadership capability to embrace diverse perspectives, foster inclusive decision-making and model inclusive behaviours across the organisation.

02. Inclusive culture

Shaping a workplace culture that promotes belonging, psychological safety and respect for all, ensuring EDI is woven into the fabric of everyday experiences at ANZ Bank New Zealand.

03. Inclusive careers

Driving equity in recruitment, development and career progression to ensure fair and inclusive opportunities for all employees.

Over the next two years, our focus remains on increasing the representation of women in leadership roles and, through the Tākiri-Ā-Rangi Te Ao Māori Strategy, enhancing the representation of Māori and Pasifika peoples across our workforce and leadership. For more on our Tākiri-Ā-Rangi Te Ao Māori Strategy see page 47.

Key actions in 2025

This year, we focused on creating opportunities for senior leaders to hear directly from our employee network leads and members, including:

- → Sharing insights into the history and purpose of our networks with ANZ's CEO Nuno Matos.
- → Holding a series of focus groups with senior executives to understand opportunities to improve inclusion. All-gender change room facilities were opened at our head office in Docklands following feedback from these sessions.
- → A discussion was held between ANZ's Board and employees in which both groups shared their experiences and recommendations for improvements.

More information on these programs is available at **anz.com/about-us/esg/workplace-participationdiversity**

Refer to the 2025 ESG Frameworks and Data Pack at **anz.com/esgreport** for further information on the summer internships and graduate program participants

1. Includes Suncorp Bank. **2.** We are currently developing our sixth RAP, to be governed by Reconciliation Australia, which we plan to launch in 2026 to support the delivery of the First Nations Strategy.

Gender pay equality

Foundational ESG issue

There continues to be solid progress towards reducing ANZ's gender pay gap.

Gender Pay Gap (WGEA – Australian Workplace Gender Equality Agency)

The gender pay gap represents the difference between the total pay[3] that women and men[4] earn across all roles.

	Average		Median	
Reporting Year	**2025**	**YoY change**	**2025**	**YoY change**
Gender Pay Gap[1]	17.2%	⌄ -1.6 ppt	18.9%	⌄ -2.2 ppt%
Pay Equity Gap[2]	0.7%	⌃ 0.4 ppt	0.4%	⌃ 0.4 ppt%

⌃ Increase (in favour of men) ⌄ Decrease (in favour of women)

Outcomes

ANZ's continued focus on gender pay equality has led to a further narrowing of our gender pay gap in 2025. At 17.2% we have reduced the average total pay gap by 1.6 percentage points (ppt) year-on-year. While we have more work to do, we are encouraged that it remains below the latest reported industry average benchmark of 22.2% for financial and insurance services.

We have also reduced our median gender pay gap – now at 18.9%. We are consistently reducing this gap and remain below the latest reported industry median benchmark also of 22.2% for financial and insurance services.

As these reported gaps are based on total pay, they are susceptible to fluctuation due to several factors such as variable pay pools and workforce composition. We continue to supplement these disclosures with the reporting of fixed remuneration[5] gender pay gaps, broken down by job category.

Under the Australian Workplace Gender Equality Act 2012, ANZ is required to make annual public filings with the Workplace Gender Equality Agency (WGEA), disclosing its 'Gender Equality Indicators'. These reports are filed annually for the 12-month period ending 31 March. A copy of the latest filing is available at **anz.com/gender**.

Pay equity gap (like-for-like roles):

The pay equity gap represents the difference between the total pay of women and men **in the same or similar roles** based in Australia.

Outcomes

ANZ's pay equity gap remains minimal at less than 1% (currently in favour of men). Year-on-year there has been a small widening, attributable to outliers rather than systemic issues. We remain confident that the measures we have implemented are effective.

For more detail on our gender pay reporting and remuneration see our 2025 ESG Data and Frameworks Pack available at **anz.com/esgreport**

More information on how we report our gender pay gap is available at **anz.com.au/about-us/esg/workplace-participation-diversity/gender/equality-reporting**

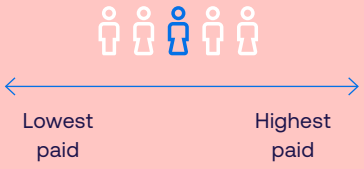
Average

Sum of pay divided by

Sum of employees

Average Pay Gap is calculated by dividing the average remuneration for women by the average remuneration for men

Median



Median Pay Gap is calculated by dividing the mid-point remuneration for women by the mid-point remuneration for men

1. Includes CEO, Executive Committee, permanent, casual and temporary (fixed-term) employees, and trainees/interns. Excludes ANZ Non-Bank Group, Suncorp Bank and independent contractors. Effective date 31 December 2024. Fixed remuneration data reflects actual earnings over 12-months (grossed up to 1 FTE and annualised). Variable pay is based on FY24 outcomes. **2.** Includes permanent employees. Excludes CEO, Executive Committee, casual employees, temporary (fixed-term) employees, trainees/interns, ANZ Non-Bank Group and Suncorp Bank. Total pay includes fixed remuneration as at 20 September 2024 plus FY24 variable pay outcomes (grossed up to 1 FTE and annualised). **3.** Includes both fixed and variable pay, such as bonuses. **4.** Gender data reported using binary female and male categories to ensure confidentiality of our non-binary and gender diverse employees. ANZ recognises and respects diverse gender identities and is focused on providing a safe, respectful and inclusive workplace. **5.** Fixed remuneration, such as base salary and superannuation.

Gender balance

Foundational ESG issue

Maintaining the focus on achieving gender balance remains a key priority across ANZ's geographies and businesses. We have continued to improve gender data reporting to enable divisions to identify areas that require focus and track progress.

New Zealand Pay Gaps

ANZ Bank New Zealand also continues to publicly report its gender pay gap (average of 18.7% favouring men in 2024)[1] and the Māori and Pasifika pay gap – the difference between the average pay for Māori and Pasifika and for European/Pākehā (21.9% in 2024 favouring European/Pākehā employees).[2]

More information on how we are working towards closing pay gaps in New Zealand is available at **anz.co.nz/about-us/corporate-responsibility/equity-diversity-and-inclusion/edi-news**

Key actions in 2025

Leadership: Increasing the number of women in more senior and higher paying roles.

Development: Addressing the gender imbalance in junior and lower paid roles, noting they make up a significant proportion of ANZ's workforce.

Data and reporting: Continuing to actively monitor and review both our gender pay gap and pay equity gap (including as part of our annual Performance and Remuneration Review process) and taking positive action to adjust where possible. Regular reporting on pay equity is provided to the Board and is also made available to help inform initiatives where appropriate.

Outcomes

We have exceeded our Women in Leadership (WIL) target this year by 0.3 ppt to 40.5% – an annual increase of 1.5 ppt.[3] Women in revenue generating leadership roles increased by 0.8 ppt to 33%. As at 30 September 2025, women as Key Management Personnel (KMP) decreased from four out of ten, to three out of nine and is now below target at 33%.

With the recent permanent Executive Committee[4] appointments of Stephen White, Pedro Rodeia, Christine Palmer and Donald Patra (who will commence from October to December 2025) women as KMP will increase back to 40%. More information on the Executive Committee[4] is available in the 2025 Annual Report available at **anz.com/annualreport**.

For more information about employee gender breakdowns see our 2025 ESG Data and Frameworks Pack available at **anz.com/esgreport**

For more information on our approach to gender equity see **anz.com/gender**

Key actions in 2025

In 2025, there has been a strong focus on building the WIL pipeline particularly in our divisions with large leadership populations and higher proportions of men, such as Institutional and Technology.

Our Markets Acceleration Program (MAP) was launched in 2023 as a strategic initiative to address the under-representation of women in front-line Markets roles such as sales and trading. In 2025, the program continued to include participants from Australia and Singapore. All eight participants from the inaugural cohort transitioned to roles in Markets. More information on the program and application process is available at **anz.com.au/newsroom/news/2025/march/markets-acceleration-program-diversity-career**.

Further detail on our gender diversity targets (including at the Board level) can be found in our Corporate Governance Statement and our Diversity and Inclusion Policy available at **anz.com/corporategovernance**

1. Includes permanent employees of ANZ Bank New Zealand Limited, excluding the New Zealand CEO. Percentages are based on full-time equivalent average Total Pay (salary and superannuation, where it forms part of a fixed remuneration package, plus variable pay). Values are provided by ANZ on a voluntary basis and are as at 30 September of the relevant year. **2.** The number of permanent employees of ANZ Bank New Zealand Limited who identify as Māori or Pasifika is 9.5% of the total permanent employee population, including employees who have not declared an ethnicity. Employees who haven't provided ethnicity data aren't included in the ethnicity pay gap calculation. We recognise that our ethnicity pay gap is based on less than half of our workforce and does not provide a complete picture. Values are provided by ANZ Bank New Zealand Limited employees on a voluntary basis and are as at 30 September 2024. **3.** FY24 Women in Leadership result of 38.8% excluded Suncorp Bank, whereas FY24 Women in Leadership baseline for FY25 Women in Leadership target is 39.0% including Suncorp Bank. **4.** Executive Committee (ExCo) comprises ANZ's most senior executives. The members of ExCo are available at **anz.com/exco**.

First Nations Strategy

Foundational ESG issue

This year ANZ launched its inaugural First Nations Strategy (Australia) *'Fuelling the Fire'*, in a first for the Australian banking sector.

This ten-year Strategy focuses on the common ground between ANZ's purpose and the aspirations of First Nations peoples: economic self-determination. ANZ's First Nations Strategy (Australia) is available at **anz.com.au/about-us/esg/first-nations-strategy**.

This Strategy builds on ANZ's ongoing commitment to reconciliation, including the completion of five Reconciliation Actions Plans (RAPs), and our 20-year investments in our Indigenous Traineeship program and First Nations financial education program, MoneyBusiness. For more information on MoneyBusiness see page 31.

The Strategy was developed by listening to the aspirations and priorities of First Nations peoples, and ANZ employees. Through this process, we identified significant common ground and win-win opportunities. This Strategy is not about what ANZ can do 'for' First Nations peoples, rather it focuses on recognising shared aspirations and working together towards a common goal.

To drive strategy execution, a First Nations Strategy Office has been established, led by executive Shelley Cable. Specialist

As a result, by 2035 ANZ aims to advance First Nations aspirations for economic self-determination by targeting three priorities:

1. **Improving financial inclusion and wellbeing** – including investing in the next generation of First Nations people to be financially empowered and confident.
2. **Banking and growing the First Nations economy** – becoming a thought leader, trusted adviser and bank of choice for the First Nations economy.
3. **Building ANZ's cultural intelligence** – improving First Nations employment, workforce cultural capability, and relevant policies.

First Nations roles have also been created across the bank, with 100% filled by Indigenous people (First Nations and Māori), including two executive roles in our Commercial division, and Talent and Culture business unit. Progress on the Strategy will be guided by First Nations people and reported to the ANZ Board and Executive Committee[1] every six months.

Key actions in 2025

Throughout 2025, ANZ made tangible progress in delivering this Strategy. This included commissioning Deloitte Access Economics to create Australia's first forecast of the First Nations economy and releasing this publicly. The report found the First Nations economy is one of Australia's fastest growing sectors and could generate $50 billion annually in revenue in the next decade, up from $16.1 billion in 2021.

ANZ also commenced its partnership with Jawun, seconding five employees to work within First Nations organisations, totalling 1,200 hours of pro bono work. We signed as a partner with First Nations Foundation to support financial inclusion and wellbeing, procured $22.9 million from 51 First Nations businesses, and surpassed $150 million in lending through our First Nations Guarantee program. The Guarantee program is delivered in partnership with three of our Institutional mining customers and has supported more than 30 First Nations business customers since 2018.

We are currently developing our sixth RAP, to be governed by Reconciliation Australia, which we plan to launch in 2026 to support the delivery of the Strategy. ANZ's final report on the 2021-2024 Stretch RAP is available at **anz.com.au/about-us/esg/workplace-participation-diversity/indigenous-australians**.

Our First Nations Strategy

To advance First Nations aspirations for economic self-determination

Priorities and vision (what we will do)

- Improving financial inclusion and wellbeing
- Banking and growing the First Nations economy
- Building ANZ's cultural intelligence

Principles (how we will do it)

- Grounded in truth and data
- Create shared value and mutual benefits
- Aligned to First Nations priorities

Business outcomes

- Reducing business risk through a considered approach to First Nations
- Protecting and growing our market share in the rapidly growing First Nations economy
- Learning and adapting to better meet customer needs

1. Executive Committee (ExCo) comprises ANZ's most senior executives. The members of ExCo are available at **anz.com/exco**.

ANZ's commitment to Māori

Foundational ESG issue

Launched in 2022, ANZ Bank New Zealand's *Tākiri-ā-Rangi Te Ao Maori* Strategy is a 2040 roadmap for how ANZ Bank New Zealand will reflect and respond to the cultural diversity of the workforce, customer base, and country in Aotearoa New Zealand. The strategy also aims to deepen ANZ's understanding of the values that are intrinsic to Māori and support the growth of the Māori economy.

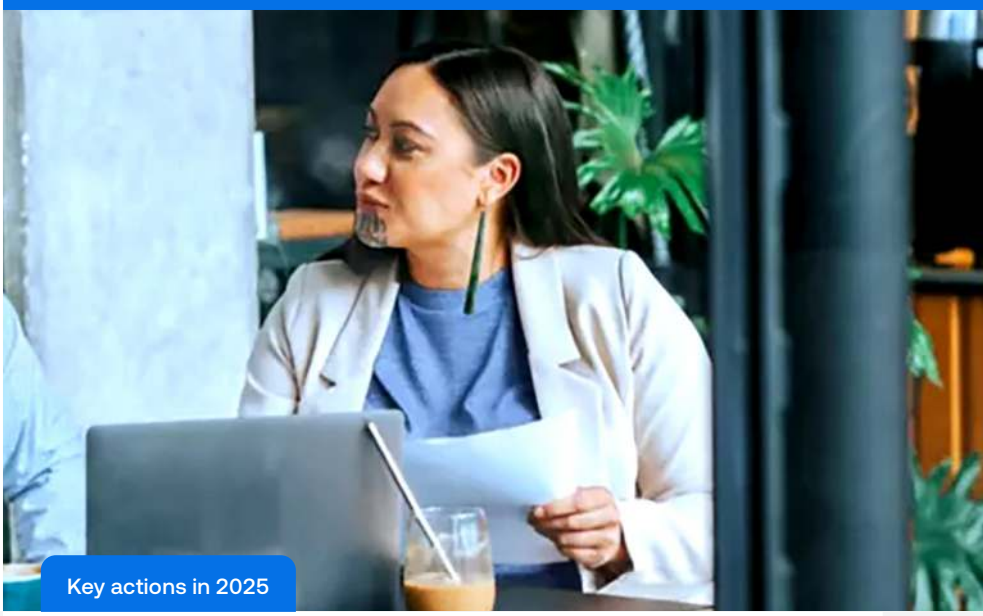
Our approach

***Tākiri-ā-Nuku*, the core framework that governs the strategy, is deeply rooted in an ancestral wharenui (large meeting house). Progress on the strategy is regularly reported to the New Zealand Leadership Team and the New Zealand Board.**

Develop stronger relationships with hapori Māori, iwi (tribe) and hapū (subtribe) across the country, acknowledging the growing contribution Māori businesses make to the economy.

Support Indigenous financial inclusion to improve Māori financial wellbeing.

Conduct a program to enhance ANZ Bank New Zealand's own understanding of Te Ao Māori (the 'Māori world view').



On 1 October 2024, ANZ Bank New Zealand launched the second two-year term of its strategy. It builds on the first term, which focused on building a culturally strong ANZ in Aotearoa New Zealand

Key actions in 2025

- Delivered *Ko Tu Ko Rongo*, Māori Housing Research Report, representing our collective understanding of and lessons from Māori housing to inform ANZ's first steps in how as a bank, we can support more Māori in home ownership.
- *Te Waka-Ā-Reo*, ANZ's internationally recognised *reo Māori* language program, is designed to increase proficiency and confidence in the language. It is now fully operational and accessible to all employees in Aotearoa New Zealand. The number of *wāhanga* (tutorials) completed continued to trend upwards during the year, with 12,423 tutorials completed, a 104% increase compared to the same period last year.
- Creating the role of *Te Kaiwhiringa Whai Rawa*, a Māori Business Specialist spanning across two regions, has seen strong growth in connecting with Māori business leaders and experts. Alongside the appointment of 28 Māori business champions across the Aotearoa New Zealand network, this has seen ANZ grow our relationships with Māori businesses and leaders.
- Our *Te Kupenga Te Kokohi* (a net to gather) employment strategy seeks to increase Māori and Pasifika representation at ANZ Bank New Zealand across Aotearoa New Zealand. Since its inception, *Te Kupenga Te Kokohi* continues to be a cornerstone of our strategic approach. In 2025, ANZ welcomed a further 28 Māori or Pasifika candidates into Customer Service Consultant roles within the Contact Centre. Out of 76 total hires, this represents 35%.

Accessibility and inclusion

Foundational ESG issue

One in six Australians and one in four New Zealanders live with disability – these are our family members, friends, neighbours and colleagues. We know that the world continues to present barriers to people with disability, preventing them from fulfilling their human rights and potential. ANZ has a proud history of supporting disability inclusion, with Accessibility and Inclusion Plans (Plan) being implemented since 2007. Each Plan has been registered with the Australian Human Rights Commission.

Our approach

The 2023 –2025 Plan includes 14 commitments designed to embed accessibility and inclusion into key aspects of our business in Australia[1] and New Zealand. We strive for greater economic and social participation for all.

The commitments are structured across four pillars:

Inclusive design By utilising inclusive design principles, we ensure as many people as possible can use our products, services, and working environments with dignity, convenience, and independence.

Customer experience We identify and address barriers to banking to promote equitable access for everyone in the community. We embrace and integrate intuitive, innovative accessibility features into our products and services.

Employee experience As a disability-confident workforce, we create safe and welcoming working environments where people with disability can thrive. We anticipate the needs of employees with disability and make the necessary adjustments to support high engagement and performance.

Community and partners Through a wide range of partnerships and ongoing consultation with leading disability organisations, changemakers, and industry groups, we are a voice for change, raising awareness and closing social and economic gaps for people with disability.

Key actions in 2025

Inclusive design

- Monthly accessibility reporting which identifies opportunities to improve accessibility in our digital channels, with uplift activities prioritised for implementation.
- Marketing guidelines reviewed by digital accessibility experts to uplift to best practice and better support inclusive customer communication.

Customer experience

- Expanded the accessibility of our customer communications by publishing an additional four Easy Read documents. Easy Read uses simplified language, large text, and supportive visuals to make information easier to understand, particularly for people with cognitive disabilities, individuals with low literacy, or those who speak English as an additional language. The new topics aim to help customers to more easily navigate banking processes, bank online and use our ANZ Classic banking app along with understanding financial vulnerability and accessing support to manage debt.
- Uplifted training materials and processes in our customer facing channels, ensuring ongoing alignment with the revised Banking Code of Practice and providing more accessible and inclusive banking services for our customers.

Employee experience

- Launched a new mandatory training program and supporting resources on mental health for all employees across the markets we operate in.
- Expanded our established Mental Health First Aid program and training in Australia and New Zealand to Manila and India.

Community and partners

- Continued sponsorship of Dylan Alcott Foundation's Ability Fest in Melbourne and Brisbane in October 2024. Ability Fest is Australia's leading accessible music festival, designed to raise awareness, help normalise disability and celebrate inclusion.
- Continued the connection with organisations such as the Brotherhood of St Laurence and Inclusion Australia, the national voice for Australians with intellectual disability, to implement the Chance for All disability employment program.
- Announced our pilot program with Berry Street Yooralla and Dylan Alcott Foundation (DAF) to provide DAF grant recipients the opportunity to strengthen their financial capability using ANZ's MoneyMinded program. This program helps empower people with disabilities to take control of their financial future.

ANZ also promotes inclusive banking through accessibility initiatives such as branch modifications, interpreting services, accessible card features for visually impaired customers, ATM enhancements (including audio guidance and tactile keypads), and ongoing improvements to website and mobile app accessibility.

ANZ's Accessibility and Inclusion Plan and information on our accessibility and inclusion programs is available at **anz.com/accessible-workplace**

1. Excludes Suncorp Bank.

Simplifying the bank

Foundational ESG issue

In September 2025, ANZ announced changes to simplify the bank, strengthen its focus on key priorities and deliver for its customers.

By stopping work that doesn't support our priorities, we will be able to better focus on delivering for our customers and improving our non-financial risk management. We will be a better bank for our people as we deliver market-leading services to our customers that our teams can be proud of.

In addition, we are building a culture of clarity, decisiveness, self-awareness, execution and accountability. A culture based on talent and performance that focuses on customers' needs, promotes healthy and sustainable ambition, external competitiveness and a desire to outperform while ensuring compliance with no short cuts.

As a result of these changes, ANZ expects approximately 3,500 employees to depart the Group by September 2026. As we undertake these changes, we are committed to working through impacts quickly and safely, with both care and respect for our people.

Support for employees where their roles have been impacted by organisational change

ANZ recognises the importance of supporting employees who are leaving the bank due to organisational change.

ANZ provides a comprehensive Career Transition Support program which includes personalised coaching, career advice, facilitated workshops and on-demand career support content, along with funding for career training.[1]

These services aim to help employees navigate their career transition effectively and secure new opportunities, either within ANZ or externally.

We also provide support for employees to navigate change through wellbeing resources (see page 50 for further detail), access to our Employee Assistance Program (discussed on page 50) and additional resources for our people leaders to support their teams through change.

Suncorp Bank employees

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.

Suncorp Bank employee data has been included in the overall ANZ employee data from 1 October 2024, unless otherwise noted. The 2025 ESG Data and Frameworks Pack is available at **anz.com/esgreport**.



1. Australia and New Zealand employees only.

Engagement and wellbeing

Foundational ESG issue

Engagement

Our approach

My Voice is ANZ's enterprise-wide engagement survey that captures employee sentiment across engagement, wellbeing, inclusion, speak up culture and leadership. The survey is run twice yearly in March (a full survey) and August (a shorter, pulse survey), complementing our Risk Culture and Internal Audit surveys.

Dashboards track results from enterprise to team level, enabling tailored solutions. My Voice insights drive team conversations and improvements, inform people and culture plans and feed into Divisional and Enterprise scorecards.

Outcomes

The August 2025 pulse survey results indicated a decrease in overall engagement across our key indices compared to the March 2025 survey. Engagement declined from 84% to 77%, a shift coinciding with significant changes across ANZ.

While a decline in engagement during periods of organisational change is not unexpected, we do not take these results lightly.

The results highlight the importance of remaining actively engaged with our teams, particularly through times of change and staying focused on areas where we can improve. We are committed to addressing the areas identified for improvement, including further strengthening wellbeing, inclusion and our speak up culture. These focus areas have been integrated into our broader planning and approach to non-financial risk management.

At the same time, we will continue to build on the trusting relationships and the collaborative, supportive direct team[1] environments our people identified as key positives in the survey. These strengths will support our continued work to foster a culture of excellence.

August 2025 My Voice Key Index survey results[2]

Employee engagement	Inclusion	Wellbeing	Speak Up
77%	76%	78%	80%
(March 2025: 85%)	(March 2025: 80%)	(March 2025: 80%)	(March 2025; 82%)

Wellbeing

Our approach

At ANZ, we're focused on fostering workplaces that support holistic wellbeing by being inclusive, caring, and respectful. More specifically, we are focused on strengthening our organisational systems and processes to help mitigate psychosocial hazards, while also enhancing individual level interventions across all aspects of wellbeing including mental, financial, social and physical.

Aligned with Australian Work Health and Safety legislation for managing psychosocial hazards in the workplace, ANZ's mental health roadmap continues to progress with a range of initiatives developed and implemented.

These include a psychosocial hazard checklist for large change programs and a redesign of the customer response plan for all branches to help protect employees from the impacts of inappropriate customer behaviour. It also includes the development of key psychosocial hazard considerations when designing new roles including ensuring accountability and capability requirements are clear and that there is a link between the role purpose and the strategic objectives of the bank.

Outcomes

A range of wellbeing and safety metrics are used to measure the success of the roadmap including wellbeing and safety incident reports, Employee Assistance Program utilisation and presenting issue trends, as well as relevant data points from ANZ's internal employee engagement and risk culture surveys. The roadmap is measured on an annual basis with the next iteration of the roadmap to be reviewed in late 2026.

Key actions in 2025

Another key roadmap initiative recently deployed was the Building Mentally Healthy Workplaces mandatory online course which has been deployed to all employees in 2025, with a three month period for completion. The course and supporting resources are designed to proactively strengthen the awareness and understanding of employees and people leaders in how to identify, respond and manage psychosocial hazards in the workplace. Resources include:

- A checklist for people leaders to identify any emerging or existing psychosocial hazards potentially impacting the mental health of their team.
- A range of tip sheets with practical tips and resources to help leaders and their team/s identify, manage and mitigate these hazards.

1. Refers to a group of employees who work directly with each other on a daily basis, typically employees reporting to the same manager. **2.** All results include employees and contingent workers.

Developing our people

Foundational ESG issue

As customer expectations evolve and technology advances, our working environment is constantly changing.

Our approach

To support our people to continue to deliver for our customers, strengthen non-financial risk management and build a culture of excellence, we offer a range of learning and development options to build the skills and capabilities needed today and in the future.

We manage learning and development through our Learning Council, Capability teams and Community of Practice. These groups align learning to strategy, share initiatives and address workforce learning and development needs. Training is deployed via our Learning Management System (LMS) and Our Way of Learning (OWL) platforms, while compliance training is overseen by a quarterly governance forum. The ANZ Academy also offers employees training in professional skills, banking basics, data, digital and leadership to build a future-ready workforce.

Average training hours per employee decreased by approximately 28% to 24.55 this year as mandatory learning courses were optimised (and in many cases shortened), and the range of discretionary learning courses was rationalised and reduced.

Further information on employee training is available in our 2025 ESG Data and Frameworks Pack available at **anz.com/esgreport**.

Investing in our people via learning and development is critical to enable delivery of our ANZ 2030 strategy, as we build a culture of clarity, decisiveness, self-awareness, execution and accountability.

Building internal capability

We offer learning and development opportunities on ESG risks and opportunities through our ESG@ANZ Mindset 2030 Learning Program. The optional online program includes our foundational and specialisation learning programs, supplemented by webinars and speaker events.

Since the 10-module foundational learning 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 learning program was initially established to support, exceeding our training and capability target of 65%. The most recent feedback showed that 98%[1] of respondents believed the program improved their knowledge of ESG and how it relates to ANZ, with 79% using their knowledge from the program in their role.

An ESG Competency Framework is also being developed to identify the skills, knowledge, and behaviours needed for specific roles across ANZ.

Key actions in 2025

- We are launching targeted initiatives to increase senior leader decision making confidence and support divisional leaders to own and prioritise non-financial risk management. This is part of supporting the delivery of our seven core workstreams under the Root Cause Remediation Plan, as discussed on page 16.
- Our LEAD@ANZ program focuses on enabling leaders with the right skills and capabilities to be exceptional leaders. Since launch in 2023, 72.6% of our people leaders have engaged with the program. To further unlock organisational momentum, drive strategic outcomes and model the behaviours needed for a high-performing culture, we continued our Executive Leadership Series delivering a two-part program focused on building a high productivity culture for self and teams, with 75% attendance of Senior Managers[2] and below.[3]
- Since launch of the ANZ Academy in 2024, more than 19% of employees have accessed ANZ Academy offerings, with an overall net promoter score (NPS) of 66.[4] Enterprise masterclasses covered influencing and storytelling, adaptability, data interpretation and planning and prioritisation.
- In 2025, we began a targeted skills uplift program on strengthening business analysis capability to meet evolving customer expectations and enhance operational efficiency. Focused on building practical skills, approximately 350 employees have commenced the 15-week program, representing 35% of the target workforce. As a result, a positive capability uplift has been evidenced.
- Our Australian Commercial division launched Customer Centred Conversations (CCC) to build and strengthen bankers' capabilities to hold proactive, value-driven, customer-focused conversations. CCC provides frameworks and tools to help bankers identify deeper business priorities and strategic needs through structured, customer-centric conversations. Success is measured via program uptake, behavioural change and commercial outcomes.

1. Feedback was sought from a representative sample group who completed the program a minimum of six months prior. **2.** Persons holding roles within ANZ designated as Group 3. **3.** Group 3 roles and employees below Group 3's with direct reports. **4.** The Net Promoter Score is measured with a single-question survey and reported with a number ranging from -100 to +100, where a higher score is desirable. 'Above 20' is favourable, 'above 50' is excellent, and 'above 80' is world-class.

Human rights

Foundational ESG issue

Human rights are essential to inclusive development, poverty reduction and social cohesion. It takes a whole-of-society response to identify and mitigate potential human rights risks. ANZ respects human rights, including the rights of our employees, our customers and the people in our communities. We expect the same respect for human rights from everyone who works for or with us.

Our approach

Our approach is outlined in our Human Rights Statement (Statement)[1] and is guided by our Code of Conduct, our behaviours and values, and informed by internationally recognised human rights frameworks and standards including the United Nations Guiding Principles on Business and Human Rights[2]. We report on our salient human issues in our 2025 ESG Data and Frameworks Pack, available at **anz.com/esgreport**.

Our Human Rights Grievance Mechanism (Mechanism) provides a channel for people who consider their human rights have been impacted by an ANZ large business lending customer[3] to raise a grievance with ANZ. This year, we received two grievances: one has closed with a response provided, and the other is under assessment. Our Mechanism Framework and our grievance reporting is available at **anz.com/human-rights**.

We updated our Statement and 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 Mechanism Framework was endorsed by ANZ's Board with oversight from the Executive Committee.[4]

Modern slavery and human trafficking

Modern slavery manifests in various forms including human trafficking, forced labour, debt bondage and involuntary domestic servitude. It's a global issue affecting tens of millions[5] of people which, despite international laws and regulations designed to combat it, persists in both developing and developed nations.

ANZ takes a Group-wide approach to managing modern slavery risks in our operations and supply chain.

We work to build the awareness of employees through targeted training and our suppliers and customers through engagement. We seek to continually improve our policies, processes and due diligence activities that aim to identify, assess and manage modern slavery risk.

Our approach prioritises programs of work through three key workstreams: supply chain, customers, and investments.

Our annual Modern Slavery and Human Trafficking Statement is prepared in accordance with the Australian Commonwealth's *Modern Slavery Act 2018* and the United Kingdom's *Modern Slavery Act 2015*. Our Modern Slavery and Human Trafficking Statements are available at **anz.com/esgreport**.

Key actions in 2025

Training

- Delivered targeted training on human rights to Institutional employees, including modern slavery training webinars for relationship managers
- Refreshed communications and voluntary training modules on human rights for all employees
- Updated modern slavery training for procurement managers
- Piloted modern slavery training for branch employees[6] in a region identified as having a higher risk of modern slavery due to migrant workforce

Governance

- Incorporated additional questions relating to modern slavery and human trafficking into our Social and Environmental Risk Screening Tool used by our bankers in the Commercial Business, Corporate and Agriculture customer segment in New Zealand
- Implemented a modern slavery module into our Third-Party Risk Management system

Policies, processes and standards embed our approach to human rights, including:

- **Anti-Bribery and Anti-Corruption Policy** as discussed on page 38
- **Accessibility and Inclusion Plan** as discussed on page 48
- **Climate Change Commitment** as discussed on pages 27-28
- **Diversity and Inclusion Policy** as discussed on page 43
- **Equal Opportunity, Bullying and Harassment Policy** available at **anz.com/corporate-governance**
- **Modern Slavery and Human Trafficking Statement** as discussed on page 52
- **Social and Environmental Risk Policy and Standard** as discussed on page 39
- **Supplier Code of Practice** as discussed on page 41
- **Complaints processes** as discussed on page 26

1. Suncorp Bank was acquired by ANZ on 31 July 2024. 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 outlined at page 2. Suncorp Bank is not yet integrated into ANZ's Human Rights Statement while work is undertaken to align Suncorp Bank where appropriate. **2.** A set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations. **3.** Large business lending customers are current or former lending customers of ANZ's Institutional division. **4.** Executive Committee (ExCo) comprises ANZ's most senior executives. The members of ExCo are available at **anz.com/exco**. **5.** Walk Free Global Slavery Index available at **https://www.walkfree.org/global-slavery-index/**. **6.** Excludes Suncorp Bank.

Community investment

Foundational ESG issue

Community investment helps to strengthen local economies and social infrastructure. During the year, we invested in the communities in which we operate and continued to work closely with our community partners to provide support for them and their clients in a respectful, fair, and appropriate way.

Community grants[2,3]

$1,815,347
in community grants were provided this year

$250,000
in **ANZ Seeds of Renewal** community grants

$465,750
in **ANZ Community Foundation** grants

NZ$937,255
in **ANZ Bank New Zealand Staff Foundation** grants

FJ$27,363
in **ANZ Fiji Staff Foundation** donations

We have measured the dollar value of community investment in accordance with the Business for Societal Impact Framework (B4SI).

In 2025, our community investment was over $132.2 million[1]. In addition, we facilitated more than $31.0 million[1] in donations to community organisations through our employees, customers, shareholders, other partners, and the public.

Our approach

Giving

Our workplace giving program enables employees in Australia to make contributions to 28 charity partners through regular or once-off pre-tax payroll deductions.

Disaster relief and recovery

We support customers and communities to respond and recover from weather related events. ANZ's Disaster Relief and Recovery Policy and Suncorp Bank's approach guide an efficient, coordinated, and proportionate response to disasters. They encompass a range of measures including hardship assistance and financial support to assist with community rebuilding.

Key actions in 2025

- This year, ANZ and our Australian employees donated over $1.3 million[2] to our charity partners through workplace giving. ANZ also matches donations made by employees in New Zealand and Fiji through payroll to their respective staff foundations[2].
- Throughout the year, ANZ and Suncorp Bank supported customers in Queensland and New South Wales affected by cyclones and floods, helping communities navigate recovery and build resilience. In addition, Suncorp Bank donated $50,000 to OzHarvest this year to provide food relief for communities impacted by ex-Tropical Cyclone Alfred.
- In December 2024, ANZ activated a financial relief package for customers in Vanuatu affected by a 7.3 magnitude earthquake. In addition, ANZ donated $100,000 to Vanuatu Red Cross Society to help the people of Vanuatu with recovery efforts. More information on how we invest in the community is available at **anz.com/community**. A further breakdown of ANZ's community investment is available in our 2025 ESG Data and Frameworks Pack available at **anz.com/esgreport**.

1. Includes Suncorp Bank except for foregone revenue. Refer to the 2025 ESG Data and Frameworks Pack for a detailed breakdown of our 2025 community investment. **2.** Excludes Suncorp Bank. **3.** Charitable trusts that provide small grants.

Appendix

ESG targets and related Sustainable Development Goals (SDG)

SDG cautionary statement on inclusion

ANZ supports the United Nations (UN) Sustainable Development Goals (SDGs), and we believe that business has an important role to play in their achievement.

The SDGs are a collection of 17 non-legally binding, interlinked global goals produced by the UN for countries and governments.

The SDGs are included to show how our ESG approach supports the SDGs. ANZ makes no representation, warranty, or assurance of any kind, express or implied, and takes no responsibility or liability as to whether ANZ's strategy furthers the objective or achieves the purpose of the indicated SDG. More information on the SDGs is available at **un.org/sustainabledevelopment**. The content of this publication has not been approved by the UN and does not reflect the views of the UN or its officials or Member States.

Concluding targets[1]	Related UN SDGs
Savings program pilots	
Large Emitters Engagement Program (LEEP)	
Operational emissions and non-emissions • Scope 1 and Scope 2 emissions • Renewable electricity • Water • Waste • Paper	
New Zealand retail lending	

Continuing targets[1]	Related UN SDGs
$10 billion social and affordable housing	
$100 billion social and environmental activities	
Sectoral pathways and targets in place for 10 sectors or sub-sectors, to transition lending to net zero financed emissions by 2050[2]	
Operational emissions[3] • Scope 1 and Scope 2 emissions	
Gender equity targets[3]	

1. Targets exclude Suncorp Bank, unless otherwise stated. **2.** Our 2025 Climate Report available at **anz.com/esgreport** details important information about the scope of our sectoral pathways. Revised pathways and targets include customers of Suncorp Bank that meet our in-scope criteria for inclusion in our pathways. **3.** Includes Suncorp Bank.

Explanatory note for the target to fund and facilitate $10 billion in affordable, secure and sustainable housing by 2030 across Australia and New Zealand.

'Affordable, secure and sustainable housing' is defined as the products and services provided to our customers in Australia to the extent they are related to the defined activities below. The $10 billion target is reported as at 30 September 2025 and is a twelve-year Australia and New Zealand target, from 2018 to 2030.

It includes all financing either funded or facilitated by ANZ through its products and services, including, but not limited to, loans, guarantees and bonds, markets products and advisory services. It also includes certain labelled sustainable finance products such as social/ sustainability bonds and Sustainability-Linked loans (SLLs).

Our approach to our $10 billion target:

- aligns to United Nations Sustainable Development Goals (SDGs), specifically SDG 9 Industry, Innovation and Infrastructure and 11 Sustainable Cities and Communities with support of SDG 3 Good Health and Well-Being; and
- commits to conducting an annual review of activities and methodologies used to guide activities that qualify for the $10 billion target. This may result in the inclusion of new activities and any material changes will be transparently disclosed. The inclusion of new activities will not be applied retrospectively.
- The $10 billion target activities specifically include the construction of, or investment in, Australian and New Zealand housing supply that supports positive market change, including the following aims:
  - supporting social housing for vulnerable communities;
  - expanding the availability of affordable housing for rental or purchase;
  - increasing the availability of accessible housing that provides better design to support disability and aged persons;
  - delivering security of tenure for rental and/ or including the opportunity to purchase; and
  - improving housing sustainability via design and features above minimum standards.

The target includes products and services that have been provided since 1 October 2018 above a threshold of $1 million. Transactions that qualify for this target (excluding deferred deals) contributed to the $50 billion target from 1 October 2019 to 31 March 2023, and contribute to the $100 billion target from 1 April 2023.

Glossary of terms

Term	Definition
"ANZ" or "the Group" or "our" or "we"	ANZ Group Holdings Limited and its subsidiaries, unless otherwise indicated.
ANZ Bank Group	ANZ BH Pty Ltd and each of its subsidiaries, including ANZBGL and ANZ Bank New Zealand Limited.
ANZ Bank New Zealand	ANZ Bank New Zealand Limited.
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.
Board	ANZGHL Board of Directors.
Climate Disclosure Program	An internal program of work established to enable ANZ to meet the mandatory climate-related disclosure requirements legislated by the Australian Government in 2024.
Climate risk	The financial and non-financial risks arising from climate change, including physical, transition and liability risks.
Community investment	Contributions from ANZ to address a social issue. Can be classified as time, in kind, cash, management costs or foregone revenue.
Employee engagement	The levels of enthusiasm and connection our workforce has with ANZ.
Employees	Persons employed by ANZ and paid directly through ANZ payroll. They can be permanent (full time or part time), fixed term or casual.
Financed emissions	Emissions associated with financing through loans or other financial products that result in a credit exposure. They are estimated based on an attributed proportion of the financial institution's customers' emissions. These financed emissions are part of the financial institution's Scope 3, category 15 emissions. See our 2025 Climate Report Appendix 5 ANZ Financed and Facilitated Emissions Methodology available at **anz.com/esgreport** for information about ANZ's financed emissions.
Financial education programs	Programs developed by ANZ in consultation with community partner organisations and government. These programs aim to provide real social benefits to the community by improving financial inclusion and capability of lower income individuals. Our programs include: MoneyBusiness, MoneyMinded and Saver Plus.
Gender pay gap	The overall difference in pay between men and women in the workforce.
Hardship	Typically refers to a situation where an individual is experiencing financial difficulty, making it challenging for them to meet their financial obligations. This can include situations such as loss of income, unexpected expenses, or other personal circumstances that impact one's ability to repay debts or manage financial commitments.
Labelled sustainable finance	Existing banking products with a specific sustainability related label e.g. Green, Social, Sustainability or Sustainability-Linked.
Large business customers	The customers of ANZ Institutional division where ANZ has a credit exposure.
Large Emitters Engagement Program (LEEP)	Our signature customer engagement program which provides the framework for engaging with LEEP customers on their transition plans.
MoneyBusiness	An adult financial education program designed to build the money management skills and confidence of Indigenous Australians and develop a stronger savings culture.
MoneyMinded	A flexible adult financial education program that builds knowledge, confidence and skills to help people make informed decisions and manage their money. Developed in 2002, MoneyMinded is ANZ's flagship financial education program.

Term	Definition
Nature	The Taskforce on Nature-related Financial Disclosures refers to 'nature' as the "natural world, with an emphasis on the diversity of living organisms (including people) and their interactions among themselves and with their environment."
Net zero	The state where greenhouse gas emissions are balanced by an equivalent amount of carbon removal from the atmosphere, resulting in no net increase in global emissions.
Pay Equity Gap	Sometimes called the 'like-for-like gap', is the difference in pay between men and women doing the same or similar roles.
Saver Plus	A matched savings and financial education program developed in 2003 by ANZ and the Brotherhood of St Laurence. Eligible participants who complete the program have their savings matched (up to $500) by ANZ for approved education-related expenses for themselves or their children.
Scope 1	Direct greenhouse gas emissions from sources owned or controlled by a company.
Scope 2	Indirect greenhouse gas emissions from consumption of purchased electricity, heat or steam.
Scope 3	Other indirect greenhouse gas emissions not covered in Scope 1 or Scope 2 that occur in a company's value chain as described in table 5.3 of the Greenhouse Gas Protocol's Corporate Value Chain (Scope 3) Accounting and Reporting Standard.
Sectoral pathways	Industry-specific trajectories of emissions reductions.
Sensitive sectors	An industry or business category that ANZ considers may present heightened environmental, social, or governance risks, or significant potential negative impacts. These are: Energy, Extractive Industries, Land and Forest Management, Water Management, and Military Equipment.
Sustainability-Linked	A type of labelled sustainable finance where the economic characteristics (e.g. pricing outcomes) of the financial instrument are linked to predetermined sustainability performance objectives.
Transition plan	A climate-related transition plan is an aspect of an entity's overall strategy that lays out the entity's targets, actions or resources for its transition towards a lower-carbon economy, including actions such as reducing its emissions.
Women in leadership	Measures proportion of women out of the entire Senior Manager, Executive, Senior Executive and Group Executive Committee populations (roles within ANZ designated as Groups 3, 2 and 1 respectively). Includes all employees regardless of leave status but not contractors (which are included in full-time equivalent).

Independent Assurance Statement

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 ANZ 2025 ESG Report and ANZ 2025 ESG Data and Frameworks Pack, has not been prepared by ANZ Group Holdings Limited in all material respects, in accordance with the Criteria for the year ended 30 September 2025.

Information Subject to Assurance and Criteria Used as the Basis of Reporting

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	Location	Criteria used as the Basis of Reporting (the "Criteria")
2025 ESG Report	Pages 4-55	• GRI Universal Standards published by the Global Reporting Initiative (GRI) version dated 2021 • ANZ's Social and Environmental Sustainability Target Methodology • ANZ's explanatory note on page 55
2025 ESG Data and Frameworks Pack	• All data sheets • GRI Content Index	

We assessed the information subject to assurance against the Criteria. The information subject to assurance needs to be read and understood together with the Criteria available at **anz.com/esgreport**.

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 operating 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 process for determining material ESG issues. The material ESG issues inform the risk-based limited assurance testing performed on material data metrics and narrative claims presented in the 2025 ESG Report and 2025 ESG Data and Frameworks Pack;
- Interviews with relevant ANZ management and staff concerning ANZ's ESG frameworks and policies for material ESG issues, and the implementation of these across the business;
- Interviews with relevant management responsible for developing the context (text and data) within the 2025 ESG Report and 2025 ANZ ESG Data and Frameworks Pack to understand the approach for monitoring, collecting and reporting;
- Comparing text and data (on a sample basis) presented in the 2025 ESG Report and 2025 ESG Data and Frameworks Pack to underlying sources. This includes assessing whether all material matters are appropriately included, whether any have been omitted, and whether the reported text and data accurately reflect the underlying information;
- Testing over ESG targets presented in the 2025 ESG Report and 2025 ESG Data and Frameworks Pack and the disclosed outcomes and performance of the targets;
- Performing a consistency check of the 2025 ESG Report and 2025 ANZ ESG Data and Frameworks Pack included within the 2025 ANZ Climate Report and 2025 Annual Report; and
- Reviewing ANZ's assessment of the disclosures in relation to the GRI; and
- Reviewing the 2025 ANZ ESG Report and 2025 ANZ ESG Data and Frameworks Pack (in their entirety) to ensure it is consistent with KPMG's overall knowledge of, and experience with, the ESG performance of ANZ.

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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:

- determining appropriate reporting topics and selecting or establishing suitable criteria for measuring, evaluating and preparing the information subject to assurance;
- 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 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

KPMG

SE Newman

Sarah Newman
Partner

Melbourne
7 November 2025

KPMG

KPMG

Maria Trinci

Maria Trinci
Partner

Melbourne
7 November 2025

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