



# Group Sanctions Policy Summary

## WHY DOES ANZ HAVE THIS POLICY?

With operations in many jurisdictions, ANZ must comply with all applicable laws in all of the jurisdictions in which it operates, including requirements of supra-national organisations, such as the United Nations and European Union. This policy sets out ANZ's approach to detection and deterrence of sanctioned parties, jurisdictions and products which may have a connection with ANZ products or services.

## HOW DOES THIS POLICY APPLY AT ANZ?

This policy applies to all employees and contingent workers of the ANZ Group and is supported by specific standards and annual mandatory training. All employees and contingent workers must comply with this policy under the ANZ Code of Conduct

## KEY OBLIGATIONS

Under this policy ANZ:

- has implemented a risk-based preventive approach, using practises that identify, manage, and mitigate sanctions risk in all jurisdictions of ANZ representation
- reserves the right not to process transactions involving certain jurisdictions, products, or services; for ANZ policy or risk appetite reasons.
- except in limited and pre-approved circumstances does not enter, or remain involved in, transactions that have any connection directly or indirectly with Cuba, Iran, North Korea, Syria, or the Occupied Territories of Crimea, Donetsk, and Luhansk, including any transactions initiated from these jurisdictions.
- except in limited and pre-approved circumstances does not enter, or remain involved in, commercial transactions that have any connection directly or indirectly with Belarus, Russia or the Disputed Territories of Kherson or Zaporizhzhia.
- except in limited and pre-approved circumstances does not enter, or remain involved in, transactions that have any connection with some sectors of the economy (e.g., the Energy Sector (Oil, Gas, Petrochemical), Telecommunications, Information Technology and Software, Defence, Intelligence and Security and Aerospace sectors) in some jurisdictions e.g., Venezuela. Other sectors and jurisdictions may be relevant. If in doubt, please discuss with your ANZ representative.
- does not enter, or remain involved in, a transaction or relationship that directly or indirectly involves a sanctioned party or product
- conducts customer identification and verification activities in proportion to the sanctions risk posed by that customer or product.
- monitors customers for evidence of suspicious activity and reports such activity where it suspects a person may be acting illegally.
- files all reports it deems appropriate with the sanctions regulators in jurisdictions of ANZ representation.
- ensures that third parties acting for ANZ comply with this policy.
- retains all records that may be relevant to this policy at ANZ for a minimum of 7 years.

**Last review:** October 2023