

# ANZ Human Rights Statement

June 2025

ANZ Group Holdings Limited (ANZ) ABN 16 659 510 791



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# Our approach

**ANZ respects human rights, including the rights of our employees, contingent workers and directors, our customers and communities.**

We expect the same respect for human rights from those who work for or with us including our employees, contingent workers and directors, and those with whom we have business relationships.

Our approach to respecting human rights is guided by our **Code of Conduct, our behaviours and our values.**

We consider internationally recognised human rights frameworks, standards and goals when developing and applying our approach to human rights, including:

- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- The International Bill of Human Rights

- United Nations Guiding Principles on Business and Human Rights
- Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises
- Sustainable Development Goals

We recognise that we can impact the human rights of individuals and communities through our actions as an employer, as a provider of financial services and through our broader business relationships.

## Implementing our approach

**Our approach to respecting human rights is implemented with the help of those who work for or with us as outlined in policies and processes.**

Our employees are expected to respect human rights in their day-to-day business activities. Expected standards of behaviour are set out in our **Code of Conduct** and **Code of Ethics Policy Framework**.

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

Anti-Bribery and Anti-Corruption Policy

Accessibility and Inclusion Plan

Climate Change Commitment

Complaints processes

Diversity and Inclusion Policy

Equal Opportunity, Bullying and Harassment Policy

Group Sanctions Approach

Modern Slavery Statement

Social and Environmental Risk Policy and Standard

Supplier Code of Practice

Whistleblower Policy

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

## Stakeholder engagement

By engaging with stakeholders we better understand and can respond to issues that matter to them.

We seek to support an open civic space by engaging in dialogue with a cross-section of civil society, allowing diverse views to be shared. This includes engaging with a range of stakeholders when developing and considering our approach to human rights.

We also expect our large business customers to undertake meaningful engagement with their affected and potentially affected stakeholders, where appropriate.

## Human rights due diligence

We use risk-based due diligence in seeking to identify human rights risks and impacts associated with our business relationships.

We seek to undertake enhanced human rights due diligence for large business customers operating in geographies and sectors that ANZ identifies as higher-risk or as otherwise considered necessary.

Through this due diligence, we seek to better understand our large business customers' approach to human rights, to assess associated risk implications that may be identified, and seek to avoid or mitigate potential adverse impacts.

## Expectations of business relationships

We expect our business relationships to respect human rights.

Large business customers are also expected to, where appropriate, establish or participate in effective grievance mechanisms (including, where relevant, ANZ's **Human Rights Grievance Mechanism**). They are also expected to cooperate with ANZ in the application of the Equator Principles and International Finance Corporation Performance Standards on Environmental and Social Sustainability.

Where a business relationship acts inconsistently with our expectations, we may seek to use leverage including engaging in dialogue and, where appropriate, encourage them to identify and disclose specific and time-bound improvement plans.

We may decline further financing or exit the relationship if a business relationship is unwilling to adapt its practices in an appropriate timeframe.

## Remedy

Where appropriate, we seek to cooperate in remediation of adverse human rights impacts through legitimate processes and seek to use leverage, including through dialogue, to encourage our large business customers to prevent or mitigate impacts.

We seek to further support access to remedy through the availability of channels to raise human rights concerns, including ANZ's **Human Rights Grievance Mechanism** available to people and communities who believe their human rights have been impacted by a large business lending customer. Further information about the channels through which human rights concerns may be raised with ANZ is in **Appendix A**.

ANZ does not tolerate retaliation against individuals, human rights defenders or communities raising concerns or grievances and expects the same from our business relationships.

## Compliance with law

Where applicable local laws differ from international standards, we will comply with the legal obligations and strive to apply a higher standard where relevant. We may encourage business relationships to adopt the international standards.

## Reporting and tracking

We identify and publicly report on our salient human rights issues, subject to confidentiality obligations. We identify our salient human rights issues according to where we could potentially cause or contribute to the most significant negative human rights impacts.

Although we cannot control or avoid all of these, we seek to reduce their likelihood and respond appropriately.

We **report publicly** on our approach to human rights including in our Environment, Social and Governance (ESG) Supplement, Modern Slavery Statement, Grievance Mechanism and Equator Principles reporting on **anz.com**.

## Governance

This statement has been approved by ANZ's CEO with oversight from ANZ's Board Ethics, Environment, Social and Governance Committee.

ANZ will review this Statement and seek external stakeholder feedback every three years.



## Questions and complaints

**Human rights complaints and grievances can be raised as outlined in Appendix A.**

Questions relating to ANZ's Human Rights Statement can be addressed to:

**ANZ Head of ESG Governance**  
Level 9  
833 Collins Street  
Melbourne, 3008 Australia  
Email: [esg@anz.com](mailto:esg@anz.com)

## Appendix A: How to raise human rights complaints with us

<b>ANZ employees</b>	<p>Employees, contingent workers and directors can:</p> <ul style="list-style-type: none"> <li>• contact their line manager or skip line manager;</li> <li>• raise a request via People Hub;</li> <li>• contact the relevant Talent and Culture business partner; or</li> <li>• follow the applicable complaints procedure, in relation to any concerns arising under a particular ANZ policy.</li> </ul> <p>Employees, contingent workers and directors and their relatives or dependants can use our <b>Whistleblower process</b> and disclosures can also be made to ANZ's External Whistleblower Service.</p>
<b>ANZ customers</b>	<p>Customers can access our customer complaint resolution process in all locations at <b>Contact us (anz.com)</b>.</p>
<b>ANZ suppliers and their employees</b>	<p>Suppliers, their employees and sub-contractors can raise complaints with:</p> <ul style="list-style-type: none"> <li>• their supplier relationship point of contact, or</li> <li>• via email to <b>GroupProcurement@anz.com</b>.</li> </ul> <p>Alternatively, a supplier, contractor, subcontractor, or an employee or relative of a supplier, contractor or subcontractor, can report actual or suspected misconduct within or by ANZ under ANZ's <b>Whistleblower Policy</b>.</p>
<b>Affected people</b>	<p>People or communities (or their nominated representative) can lodge a grievance to ANZ's <b>Human Rights Grievance Mechanism (anz.com)</b> about alleged human rights impacts connected to a current or former large business lending customer. The Mechanism includes certain acceptance criteria.</p>

## Appendix B: Glossary

<b>ANZ or We</b>	ANZ Group Holdings Limited and its subsidiaries (excluding Suncorp Bank*).
<b>Business relationships</b>	Refers to relationships ANZ has with its business customers, suppliers and partners.
<b>Code of Conduct</b>	ANZ's Code of Conduct and Non-Executive Directors Code of Conduct.
<b>Human rights</b>	The United Nations defines human rights as rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status.
<b>Human rights defenders</b>	A term used to describe people who, individually or with others, act to promote or protect human rights in a peaceful manner.
<b>Large business customers</b>	The customers of ANZ's Institutional division where ANZ has a credit exposure.
<b>Large business lending customers</b>	Current or former lending customers of ANZ's Institutional division.
<b>Open civic space</b>	An environment that enables civil society to play a role in the political, economic and social life of our societies.

\* Suncorp Bank was acquired by ANZ on 31 July 2024. Suncorp Bank is excluded from this ANZ Human Rights Statement whilst work is undertaken to align Suncorp Bank where appropriate to the ANZ policies and processes described in this ANZ Human Rights Statement.

