

ANZ ANTI-MONEY LAUNDERING & COUNTER TERRORISM FINANCING PROGRAM

Executive Summary

Why does ANZ have this Program?

- Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) legislation requires ANZ to have an AML/CTF Program in place that is subject to oversight by the Board. The Program incorporates an AML/CTF Policy, which contains the key obligations that apply directly to employees.
- The primary purpose of ANZ's AML/CTF Program is identifying, mitigating and managing the risk ANZ may reasonably face of its products and services being involved in or facilitating money laundering or terrorism financing.
- As required, ANZ's Program is risk-based and sets out ANZ's approach to activities including training of employees, employee due diligence, reporting of suspicious matters and ongoing customer/transaction monitoring and customer identification processes and procedures. The program is to be implemented over time as the requirements of the Australian legislation come into effect.

How does the Program apply at ANZ?

ANZ's Group AML/CTF Program applies to all ANZ business units and majority owned subsidiaries that are members of the ANZ Designated Business Group (a group of entities formed for the purposes of adopting and reporting on compliance with ANZ's AML/CTF Program).

Key obligations

Those aspects of the Program that apply directly to employees require them to:

- follow business processes to confirm the identity of new customers and be confident that customers they are dealing with are who they claim to be
- be alert to suspicious customer behaviour
- report suspicions about customer behaviour to their business' Money Laundering Reporting Officer
- never discuss concerns of suspicious customer behaviour with customers
- complete any anti-money laundering or counter terrorist financing training ANZ asks them to complete
- follow business processes for record retention

Role of Group Compliance – Program owner

Under the Program, relevant responsibilities of Group Compliance include:

- establishing and documenting ANZ's risk-based approach to AML/CTF compliance
- promoting compliance with ANZ's AML/CTF and Economic Trade Sanctions obligations
- the development and maintenance of ANZ's Compliance Framework and the Group AML/CTF Program, including ensuring that these and all related documents are relevant in light of a changing external environment (including significant changes identified in ML/TF risk)
- developing and maintaining general awareness training on AML/CTF for all employees