5 August 2026

Market Announcements Office
ASX Limited
Exchange Place
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SYDNEY NSW 2000

Trading in ANZ Securities Policy

ANZ has updated its Trading in ANZ Securities Policy to strengthen broker account disclosure requirements, requiring all broker accounts to be disclosed regardless of activity, and to enhance controls around off-market transfers.

It has been approved for distribution by ANZ's Company Secretary.

Yours faithfully

Simon Pordage
Company Secretary
ANZ Group Holdings Limited

Trading in ANZ Securities Policy

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1. Introduction

Topic: This document states ANZ's mandatory rules regarding the trading of ANZ Securities.

Purpose: To protect customers, maintain the integrity of financial markets, safeguard ANZ's reputation, and support the effective management of Conduct Risk. It forms part of ANZ's Conduct Risk Framework and Code of Conduct.

This Policy supports ANZ in meeting its obligations with insider trading laws under Section 1043A Corporations Act 2001 (Cth) and ASX Listing Rules Guidance Note 27 (GN27).

Application: This Policy applies to:

- Entities: ANZ Group
- People: employees, contingent workers and ANZ Directors.
  Activities: Trading in ANZ Securities, entering a contract to buy, sell or exercise ANZ Securities.

This policy applies for the duration of employment at ANZ including any periods of leave.

Roles and responsibilities applicable under this policy are set out in section 4.

2. ANZ's approach

ANZ has zero tolerance for insider trading and is committed to maintaining the integrity of financial markets and protecting customers from harm arising from the misuse of Inside Information.

ANZ expects all employees, contingent workers and ANZ Directors to act in line with our values, exercise sound judgement and comply with legal and regulatory obligations, consistent with our Code of Conduct. They must avoid any actual or perceived misuse of Inside Information and, where necessary, go beyond minimum requirements to ensure their actions support fair customer outcomes, protect market confidence and uphold the standards of conduct expected of those acting on behalf of ANZ.

ANZ recognises that certain individuals due to the nature of their roles, are more likely to have access to Inside Information relating to ANZ. These staff are designated "ANZ Restricted Persons". Additional requirements apply to ANZ Restricted Persons and their Associates to manage risk arising from the Trading in ANZ Securities.

3. Policy requirements

3.1 Prohibition of Insider Trading

ANZ employees, contingent workers and ANZ Directors who have Inside Information must not Trade in ANZ Securities, advise or procure another person to Trade in ANZ Securities, or communicate Inside Information to others who may deal in ANZ Securities.

3.1.1 Additional Obligations

In addition to the general prohibition above, ANZ Restricted Persons and their Associates:

- must obtain Pre-trade Approval prior to Trading in ANZ Securities;
- must not Trade in ANZ Securities during a Blackout Period; and
- must not engage in certain other prohibited activities (as outlined below).

It is the responsibility of the ANZ Restricted Person to make their Associate(s) aware of and adhere to the obligations of this Policy. ANZ Restricted Persons must treat their Associates' transactions for the purpose of this Policy and applicable laws as if the transactions were their own.

3.2 Market perception

Trading in ANZ Securities can affect ANZ's reputation. ANZ expects all employees and contingent workers will consider how their proposed Trading in ANZ Securities could be perceived by the market before they Trade. This means considering not only whether a Trade is permitted under this Policy, but also whether it could reasonably be seen as taking advantage of their role, position, or access to information. Employees and contingent workers must not engage in Trading in ANZ Securities where the proposed Trade could be perceived as taking advantage of their position.

3.3 Blackout Periods

Blackout Periods commence:

- Two months prior to the announcement of ANZ's half year and full year financial results;
- Two weeks prior to any periodic ANZ market trading updates; and
- For any ad hoc restrictions which may be determined at the discretion of the Group's Continuous Disclosure Committee from time to time when matters subject to ASX Listing Rule 3.1A or NZX Listing Rule 3.1.2 are being considered[1] or where it is necessary to manage conflicts of interest, on the date determined by the Group's Continuous Disclosure Committee.

Blackout Periods end one trading day after the respective market announcement of ANZ financial results, updates or other market announcement or, if applicable to any ad hoc restriction, the date determined by the Group's Continuous Disclosure Committee.

3.4 Trade Approval Process

ANZ Restricted Persons and their Associates must obtain Pre-trade Approval via the Personal Account Dealing Platform **prior to Trading** in ANZ Securities. Pre-trade Approvals are valid for 48 hours. Limit orders

[1] Relates to exceptions in ASX Listing Rule 3.1A or NZX Listing Rule 3.1.2

which have not been executed within 48 hours require a new Pre-trade Approval. Pre-Trade Approval is not required for certain activities outlined in Schedule 2.

When an ANZ Restricted Person is on leave and they do not have access to ANZ systems and/or the Star Compliance app, they must submit Pre-trade Approval requests to their Line Manager and ANZ Control Room via email.

ANZ Directors, Key Management Personnel and ExCo Members are subject to additional Pre-trade Approval requirements:

- ExCo Members and Key Management Personnel must obtain Pre-trade Approval from the Group Chief Risk Officer, Chief Financial Officer or Group General Counsel and record such approval with Company Secretary prior to any Trading in ANZ Securities, as outlined in Schedule 1.
- ANZ Directors and the Chief Executive Officer must obtain Pre-trade Approval from the Chairman of ANZGHL Board prior to Trading in ANZ Securities as outlined in Schedule 1.

If a person comes into possession of Inside Information after receiving Pre-trade Approval, they must not Trade in ANZ Securities despite having received Pre-trade Approval. Acknowledgement of a Pre-trade Approval by or on behalf of ANZ is intended as a compliance monitoring function only and is not an endorsement of the proposed transaction. Individuals continue to be responsible for their own investment decisions and their compliance with law. If required, ANZ Restricted Persons who have not received Pre-trade Approval are solely responsible for following up with their Line Manager or other responsible person as outlined below for acknowledgement.

3.5 Prohibited Activities

ANZ Restricted Persons and their Associates must not engage in short term or speculative transactions in ANZ Securities, as this may lead to actual or inadvertent violations of insider trading laws or create the appearance of improper conduct.

ANZ Restricted Persons and their Associates must:

- not engage in speculative Trading of ANZ Securities;
- not engage in short sales of ANZ Securities;
- not use ANZ Securities in connection with a margin loan or similar financing arrangements that may be subject to a margin call or loan to value ratio;
- not enter into any options, derivatives or other hedging arrangements which operate to limit the economic risk of an unvested holding or a holding subject to a holding lock or clawback period under an ANZ employee or executive incentive plan in ANZ Securities; and
- have a medium to long term investment objective and must hold ANZ Securities for a minimum period of 30 calendar days.

3.6 Disclosing and registering Broker Accounts

ANZ Restricted Persons must disclose Broker Account/s owned individually or jointly by the ANZ Restricted Person or their Associates used for holding and Trading of ANZ Securities[2]. ANZ Restricted Persons must register Broker Accounts in the Personal Account Dealing Platform and keep Broker Account details up to date.

3.7 Record Keeping

ANZ Restricted Persons and their Associates must maintain records of all Trading in ANZ Securities for a minimum period of 12 months and provide these records upon request from ANZ Compliance or ANZ Control Room.

[2] This excludes Broker Accounts used individually by Associates trading solely in a professional capacity.

3.8 Pre-Trade Approval Exceptions

Pre-trade Approval is not required for certain trading activities relating to ANZ Securities. Refer to Schedule 2.
Exceptions to this Policy must be submitted using the Personal Account Dealing Platform and be approved by the ANZ Restricted Person's Line Manager and the ANZ Control Room.

Exceptions to this Policy will only be granted in exceptional circumstances. For example, where the ANZ Restricted Person is experiencing severe financial hardship or has an unanticipated significant financial commitment.

4. Roles and responsibilities

Role	Responsibilities
Employees, Contingent Workers and Directors (Line 1a)	• Must comply with the requirements of this policy • Promptly escalate actual or potential incidents or issues, including those involving possible misuse of inside information.
People Leaders (Line 1A)	• Review any special circumstances which may be relevant for an exception approval request for their direct reports and assess whether there is an actual or perceived conflict of interest which impacts the ANZ Restricted Person's request to transact in ANZ Securities • When absent or unable to complete duties, delegate responsibility to the skip line manager by advising ANZ Control Room. • Regularly review and maintain a list of ANZ Restricted Persons within their business unit in conjunction with Line IB.
Business Unit (Line 1B)	• Regularly review and maintain a list of ANZ Restricted Persons within their business unit in conjunction with 1A [and advise ANZ Control Room to configure the employee's SuccessFactors profile]. • Monitor compliance with Trading in ANZ Securities policy and escalate/report as required to Business Executive, Divisional Risk Committee, Divisional Compliance. • Case management of any potential Policy breaches in NFR Hub.

ANZ Control Room (Line 2)	• Provide specialist compliance advice on conflicts of interest and related regulatory requirements.
	• Own and maintain this Policy and procedures.
	• Record all Pre-trade Approval requests and decisions other than with respect to:
	  – ANZ Directors
	  – ANZ Directors of Controlled Entities other than ANZGHL subsidiaries.
	• Review and, if appropriate, approve and record any exemptions to this Policy.
	• Assess monitor and report breaches of the Policy.
	• Communicate the requirements of this Policy, and any changes, to all employees.
	• Advise the business (Lines 1A and 1B) in the application of this Policy, where required.

Divisional Compliance Line 2	• Independently advise, oversee and challenge Line 1 risk management practices relating to this Policy. • Monitor adherence and provide independent review and challenge of risk management relating to the Policy.
Line 3	• Independently review and assure the effectiveness of risk management relating to this Policy. • Evaluate the adequacy and effectiveness of governance, risk management and controls across Line 1 and Line 2. • Provide independent and objective assurance that controls are operating effectively.

Company Secretary	• Record all Pre-trade Approval requests and decisions by:
	  – ANZ Directors, including ANZ Directors of controlled entities other than ANZGHL subsidiaries;
	  – ExCo Members; and
	  – Key Management Personnel.
	• Provide a copy of these records to the Control Room if requested.

Chief Financial Officer, Chief Risk Officer, Group General Counsel	• Review and, if appropriate, approve Pre-trade Approval requests for ExCo Members and Key Management Personnel and their Associates, via the Personal Account Dealing Platform.

5. Compliance

Failure to comply with this document may lead to disciplinary action and may affect performance and remuneration outcomes.

Potential or realised breaches of this Policy must be escalated and managed according to the Event Management Standard.

All Policy exemptions must be submitted for approval to the owner using the Policy Exemption Form.

This Policy is not part of employee contracts and may be changed or retired at any time. If the law imposes a higher standard than this document, the legal obligation prevails.

6. Definitions

Terms are defined in the Policy glossary. The following terms are defined for the purposes of this document:

Term	Definition
Associate	• Spouse or partner (including de facto or same sex partner); • child (who is under 18 years old); • a dependent or any other person over whose investment decisions the ANZ Restricted Person can reasonably be expected to have influence or control; and • any entities, including any corporations, Self-Managed Super Funds (SMSF), partnerships or trusts, over which the ANZ Restricted Person or the ANZ Restricted Person's Associate have influence or control.
ANZ Director	• a person appointed to the Board of Directors of ANZBGL, ANZGHL or a controlled entity, who is not an employee or contingent worker.
ANZ Restricted Persons	• employees who, due to the nature of their position (including those who hold senior positions) are likely to come in contact with, or have access to key financial, operational or strategic information about ANZ that will (or is likely to) have a material effect on the price or value of ANZ Securities. Examples of such information include but are not limited to, unpublished financial results, potential mergers or acquisitions, vendor or supplier contract negotiations, new product launches, changes in senior management, significant regulatory matters. • ANZ Restricted Persons include but are not limited to: - ANZ Directors; - ExCo Members ; - Key Management Personnel; - All Group 1 and 2 staff and their executive assistants; - ANZ Control Room; and - Any other person designated by a Risk Owner or an ExCo Member as an ANZ Restricted Person • **Employees** – To verify your Restricted Person status, view the status displayed in your SuccessFactors employee profile (PDF). • **Line Manager** - To verify your direct report's Restricted Person status, view their status displayed in the Manage my Team section of your SuccessFactors profile (PDF).
ANZ Rights	• a right to acquire a share at nil cost subject to satisfactorily meeting either time a or performance-based hurdles, including: - ANZ deferred share rights, - ANZ performance rights, and - ANZ restricted rights.
ANZ Security	• a share or bond issued by, or a debenture of, ANZGHL or a controlled entity, • any other security or financial product issued by ANZGHL or a controlled entity that can be traded on a venue, or • an option, derivative, future or warrant relating to any security or financial product referred to above and, where the context requires, includes an ANZ Right.
Blackout Period	• the period during which ANZ Restricted Persons and their Associates are prohibited from Trading in ANZ Securities.
Broker Account	• any account used for the purpose of holding or transacting in ANZ Securities: - held by an ANZ Restricted Person or their Associate, either individually or jointly, where the ANZ Restricted Person or Associate is a named account holder; or

	– over which the ANZ Restricted Person or their Associate has trading authority or trading discretion, whether alone or jointly with others, for the purpose of holding or transacting in ANZ Securities.
Conduct Risk	• the risk of loss or damage arising from the failure of ANZ, its employees and agents to appropriately consider the interests of customers, the integrity of the financial markets, and the expectations of stakeholders in conducting ANZ business activities.
ExCo Members	• Group Executives of ANZ who directly report to ANZ Chief Executive Officer.
Inside Information	• information that is not generally available to the public and if the information were generally available, a reasonable person would expect it to have a material effect on the price or value of ANZ Securities.
Key Management Personnel	• certain employees who hold senior or influential positions who may have trading activities that attract increased regulatory or reputational scrutiny (ASX Listing Rule Guidance Note 27 and Accounting Standard AASB 124).
Personal Account Dealing Platform	• the technology platform utilised by ANZ, StarCompliance, to assist with Pre-trade Approvals.
Pre-trade Approval	• receipt of a formal written approval from the Personal Account Dealing Platform before placing or executing a trade or order via a Broker Account.
Trade/ Trading in/ of ANZ Securities	• any transaction or change affecting title to or interest in ANZ Securities or ANZ Rights, including: – buying, selling or applying for ANZ Securities or instructing a third party or Associate to do so, – entering a contract to buy, sell or apply for ANZ Securities, or procuring a third party or Associate to do so, – entering a contract for difference (CFD) relating to ANZ Securities, – entering a contract to buy, sell or exercise ANZ Rights, – the conversion of convertible ANZ Securities, – exercising ANZ Rights to elect to start, stop or vary participation in ANZ's Dividend Reinvestment Plan or bonus option plan, – spread betting in relation to an ANZ Security, – issuance of ANZ Securities, or – agreeing or applying to do any of the above. • excludes receipt of ANZ Securities (including Rights and shares), the vesting of share rights, and the allocation or issue of shares on the automatic exercise of share rights under any ANZ Employee or Non-Executive Director Plan which may be in place from time to time.

7. Document information

Effective date	**3 August 2026**
Next review date	3 August 2029
Approver	Chief Risk Officer
Owner	*Head of Compliance Institutional*
Review cycle	Every 3 years
Contacts	ANZControlRoom@anz.com

8. Related documents

This document forms part of the following document hierarchy:

Framework	Conduct Risk Framework
Policy	*Trading in ANZ Securities Policy*
Standard	*N/A*
Procedure	*N/A*

This document must be read in conjunction with these related documents:

1. Code of Conduct
2. Conflicts of Interest Policy
3. Non-financial risk framework
4. Performance and Remuneration Policy
5. Trading in Non-ANZ Securities Policy
6. StarCompliance Personal Account Dealing User Guide

9. Document history

Version	Approval date	Effective date	Summary of changes
1.0	27 July 2026	3 August 2026	Transitioned to new policy template. Uplift and simplification of the Policy

Schedule 1

Member/Group	Details
ExCo Members and Key Management Personnel	• Written approval must be obtained from one of the Chief Financial Officer, Chief Risk Officer, and Group General Counsel via the Personal Account Dealing Platform prior to undertaking any Trade in ANZ Securities. • A Pre-trade Approval request must be submitted via the Personal Account Dealing Platform in Star Compliance prior to undertaking any Trade in ANZ Securities. • A copy of the approval must be provided to the ANZGHL Company Secretary.
ANZ Directors ANZ Chief Executive Officer	• Written approval must be obtained from the Chairman of ANZGHL Board prior to Trading in ANZ Securities outside the Blackout Period. • Where the Chairman is unavailable, written approval from the Chairman of the ANZGHL Audit Committee is required. • A copy of the approval must be provided to the ANZGHL Company Secretary
ANZ Directors of ANZGHL subsidiaries (excluding ANZBGL)	• Approval request must be submitted to the Company Secretary via corpgovemelb@anz.com. The Company Secretary will obtain the required written Pre-trade Approval on your behalf and advise you of the outcome.

Schedule 2

Activities exempt from Pre-Trade Approval	Details
Rights offers/share buy-backs	• disposal of ANZ Securities arising from the acceptance of an equal access share buy-back, takeover offer or scheme of arrangement. • disposal of rights acquired under a pro rata issue. • acquisition of ANZ Securities pursuant to a pro rata issue. • undertake or elect to take up entitlements under a rights issue or any other offer that has been announced on a securities. exchange provided the ANZ Restricted Person and/ or Associate is not in possession of Inside Information at the time of making such an election. ANZ Restricted Persons and their Associates may also choose to renounce or otherwise allow such entitlements to lapse. • to comply with a compulsory acquisition under the Corporations Act in Australia or under equivalent laws elsewhere • any mandatory conversion of ANZ Securities (e.g. convertible notes) into ordinary shares that occurs automatically under the terms and conditions of the instrument and does not require any active participation or instruction from the ANZ Restricted Person and/ or their Associates.
Acquisition of shares without payment	• receipt, vesting or automatic exercise of rights or allocation or issue of ANZ Securities under ANZ's Employee Share Acquisition Plan (ESAP), ANZ Share Option Plan (ASOP) or any ANZ Non-Executive Director Plan which may be in place from time to time. • the receipt of ANZ Securities as a gift without a requirement for any payment (e.g. gifted from a will).
Dividend Reinvestment Plan (DRP)	• election to start, cease or vary participation in ANZ's DRP or bonus option plan provided that the ANZ Restricted Person and/ or Associate is not in possession of Inside Information when the election is made.
Off Market Transfers	• outside of Blackout Periods, a transfer of ANZ Securities from a Broker Account held solely in the name of the ANZ Restricted Person and/ or Associate to another Broker Account held in the ANZ Restricted Person and/ or Associate's own name.
Exercising Rights	• an exercise of ANZ Rights by the ANZ Restricted Person (i.e. to 'acquire and hold' the ANZ Securities that are the subject of the ANZ Rights) provided the exercise is completed outside a Blackout Period. • For the avoidance of doubt, Pre-trade Approval is required: • before disposing of the ANZ Securities acquired following such an exercise, and • via a special circumstance trading application, to exercise ANZ Rights during a Blackout Period.
Professional Capacity	• Associates, trading within the scope of their own employment with a third party (e.g. an Associate who is a stockbroker trading in their professional capacity for a non-related party is exempt).
Indirect/Incidental trading	• indirect and incidental Trading of ANZ Securities that occurs because of dealing in ANZ Securities issued by a managed investment scheme, listed investment company, exchange traded fund (ETF) or similar investment vehicle, that is managed by a third party and that holds ANZ Securities as part of its portfolio.