



# Summary of ANZ New Zealand's Fair Conduct Programme

This is a summary of our Fair Conduct Programme. Our Fair Conduct Programme covers the policies and processes which help us meet the Fair Conduct Principle to treat customers fairly. Treating customers fairly is a requirement in the Financial Markets Conduct Act.

## What is the Fair Conduct Principle?

Under the Fair Conduct Principle, we must treat consumers fairly when we design and provide our products and services. We must also treat consumers fairly when we, or our intermediaries, deal with or interact with consumers.

To find out more, visit [legislation.govt.nz](https://legislation.govt.nz).

## Meeting our legal duties to consumers and managing risks

We must meet a wide range of legal duties when we design and provide our products and services or engage with consumers.

- Under our Code of Conduct our employees must never act illegally.
- We also seek to act in a way that upholds the law in all situations.
- We have frameworks to manage risk to help ensure that we meet our legal duties.

Our Code of Conduct also sets out what we expect of our people, supporting our values. All our people must agree to uphold our Code of Conduct.

Our risk framework helps us identify and manage our risks. Our framework frames the values driving our decision-making and risks we'll accept as we pursue our objectives.

Conduct risk is a specific focus in our risk framework. Conduct risk looks at the risk that ANZ, our staff, or agents don't consider our customers' interests

when we conduct our business. The principles in our risk framework help us focus on our customers and consistently review and manage our conduct risk.

We do these things to help us manage our conduct risk:

- Training our staff
- Having ways for our people to raise issues and concerns, including confidentially
- Handling complaints and responding to feedback from customers and others we work with
- Working collaboratively with regulators and external dispute resolution providers.

## Managing and reviewing our products and services

We have a product management framework to help ensure we design and provide our products and services correctly. We seek to ensure our products are ethical and transparent.

We identify:

- likely customers for our products and services and their needs
- who might suit, or not suit, specific products or service features
- how we'll deliver our products and services and how that impacts customers.

We regularly review our products and services, how we deliver them, and the impacts of changes on customers.

## Complying with the Fair Conduct Principle

Our Code of Conduct sets out guiding principles, including that ‘We comply with our Code, the law, and ANZ’s policies and procedures.’

Our people must complete annual training and confirm that:

- they’ve read and understood our Code of Conduct
- they haven’t breached the Code in the past 12 months
- they will report breaches through the right channels.

Our compulsory learning teaches our people to do what’s right for our customers and communities under our purpose and values, while meeting the duties we have under the law. We have essential training for all our people across the ANZ Group, training specific to us here in New Zealand, and training specific to a role or product.

## Checking how we’re treating customers

Our complaints handling framework helps us deal with complaints fairly and transparently. Our Complaints Guide sets out how we deal with customer complaints and how to contact the Banking Ombudsman Scheme.

To find out more, visit [anz.co.nz/complaints](https://anz.co.nz/complaints).

Sometimes things go wrong or we make a mistake, so we have policies and processes to identify and resolve problems that may impact customers. We strive to address issues fairly and quickly and to learn from our mistakes.

We collect and review customer feedback and complaints to assess how well we’re treating customers.

## Managing incentives and conflicts of interest

We don’t allow any performance measures for variable pay driven by sales targets.

We have policies covering conflicts of interest. We train our people to understand this and ask them to declare personal interests so we manage conflicts correctly.

## Communicating with customers

We communicate with customers in many ways, including:

- in calls or face-to-face, including in branches
- in marketing, including print, television, radio, and digital media
- through printed content, including onsite and other banking channels
- through letters, emails, texts, public notices, or in our digital banking channels.

Our policies cover how we review and approve content we produce, to help customers make informed choices and get the best from our products and services. We also use customer feedback, complaints, user testing, and focus groups to help check content is clear and helpful.

We also train our people who deal with customers directly. We check they’re following our processes and giving customers accurate and timely information.

## Addressing problems with our Fair Conduct Programme

We’ll review our Fair Conduct Programme yearly, so it remains effective and up to date.

If we identify problems with our Fair Conduct Programme, we’ll fix them and report on them to our Board.



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