

NZ Insight: Playing by the rules?

3 October 2024



This is not personal advice nor financial advice about any product or service. It does not take into account your financial situation or goals. Please refer to the Important Notice.



Contact

[Miles Workman](#) for more details.

Confused by acronyms or jargon? See a glossary [here](#).

Playing by the rules?

Key points

- Has the RBNZ fallen "*behind the curve*" when setting the OCR, or are they perhaps ahead of it?
- To attempt to answer this question we're going to need a "curve". We present a range of simple monetary policy rules (aka Taylor Rules) to provide a stake in the ground for assessing past and signalled changes to the OCR.
- The simple rules we present will never capture the full complexity of monetary policy setting behaviour, and nor do they attempt to definitively say what policy "should" do (uncertainty around the current and future states of the economy mean there are always risks for policy makers to weigh up). But there are rule specifications that move closely with the OCR over time, suggesting that if the RBNZ looks like it may be departing from the rules, there's likely something unusual going on.
- Policymaking under uncertainty was turned up to 11 in the early stages of the pandemic, and that (with the benefit of hindsight) contributed to the RBNZ delivering too much stimulus for the economic conditions via its least regrets approach. But did the RBNZ depart from the rules? The answer is a matter of perspective!
- Our best-fitting rules (which are far from perfect) suggest it is certainly appropriate for the RBNZ to now be easing monetary policy and that they may even be a little bit behind the curve. However, it would be overstating things to suggest that Taylor Rules are strongly prescribing outsized cuts. Indeed, factoring in market expectations for future easing suggests monetary conditions are in fact ahead of the curve, even if the OCR itself may be behind it. The issue with that, however, is that failure to deliver the near-term outsized cuts that the market is currently pricing in could push monetary conditions back behind the curve. So given it's now clearly on the table, and is consistent with what Taylor Rules suggest is appropriate, we think the RBNZ will take the path of least resistance and cut 50bp in both the October and November meetings, with the long summer break to provide a good opportunity to reassess where things are at after that.

Background

The monetary and fiscal policy response to the COVID pandemic exemplified policymaking under uncertainty. A 'least regrets' approach, combined with extremely dire economic projections at zero hour, justified throwing the kitchen sink at it, and data volatility combined with generalised uncertainty (noting we didn't have a vaccine rollout until early 2021) meant that for a long time, policy was operating in the dark (versus its usual fog).

As it turns out, the degree of fiscal and monetary stimulus was far too much for the economic conditions, with the least-regrets policy response setting the economy on an unsustainably overheated path, pushing domestic-driven inflation to multi-decade highs.

By the end of 2021, it was clear to the RBNZ (and everyone else) that inflation pressures required action. The RBNZ entered the hiking cycle with some degree of caution before the incoming inflation data justified a much sharper policy adjustment. For the person on the street the vibe very quickly changed from the RBNZ signalling that interest rates were going to remain low for a long while yet to interest rates rising rapidly to a point that was set to deliberately induce recession. The *least regrets* approach mitigated the risk of New Zealand being thrown into a deep and lengthy depression, but it wasn't a "*no regrets*" approach. The cost was the subsequent surge in inflation, and more recently the downturn in economic activity required to fix the inflation problem. It certainly hasn't been ideal, but what has prevailed wasn't the worst-case scenario at the time.

Conversely, fiscal policy never really changed tack. *Extreme* fiscal expansion in 2020 was followed by *large* fiscal expansions in the following three years that have not been fully unwound and are therefore still impacting the economy today. In other words, while the pace of fiscal expansion has slowed since Budget 2020's gigantic \$50bn Budget, fiscal consolidation has been very gradual. Forecast structural deficits until 2028 are clear evidence of that. But even relatively mild austerity overall hits those affected hard, and the huge cycle in fiscal policy has also been far from ideal.

While this note isn't about the fiscal stance, this is important context when considering the RBNZ's 'reaction function' – how they have responded to the data. In essence, the RBNZ has had to "make room" for the extra demand from Government by curbing private sector activity (households and businesses) via a higher-than-otherwise OCR. But the RBNZ isn't in the business of forecasting fiscal settings beyond what the Government is signalling at the time, meaning that as the Government kept injecting more stimulus into the economy (even as it was becoming overheated), the RBNZ faced a sequence of positive fiscal shocks that were difficult to incorporate into a monetary policy stance until after fiscal decisions had been taken and the Treasury had crunched the numbers. If they had been able to foresee the full extent of fiscal stimulus from the get-go, they may have tightened monetary conditions earlier than otherwise. In other words, it wasn't just a least-regrets approach combined with pandemic uncertainty that led to the RBNZ overstimulating the economy; it also took time to discover how much inflation-fuelling fiscal expansion was going to be delivered by the end.

Now we're out the other side and the easing cycle is underway, the big question is the likely pace and magnitude of monetary easing. It's inherently uncertain, and the data will have the last laugh as always, but this note hopes to shine some light on the question by investigating a swathe of monetary policy 'rules' (aka "Taylor Rules").

What is a Taylor Rule?

Named after the economist John B. Taylor who first proposed it in 1993, a Taylor Rule is an equation that provides a guideline for the policy rate based on the inflation-adjusted (real) equilibrium policy rate (the real neutral rate), how far inflation is away from target, and some measure of economic "slack". We can chop and change some of these variables (eg one could use inflation expectations or core inflation in place of current inflation, or the unemployment rate instead of the unobservable output gap as the measure of economic slack). The assumption for the neutral rate (an inherently unobservable variable that varies over time) will have a large say in the policy 'prescription' too. And finally, there are also a bunch of coefficients required that determine how much weight to put on the various components of the equation. See [Appendix](#) (page 10) for links to technical notes.

Broadly there are two main categories of Taylor Rule (at least the two we focus on): *inertial* and *non-inertial* rules. Non-inertial Taylor Rules prescribe an immediate monetary policy response to changing economic conditions, while inertial rules prescribe a more gradual adjustment. The latter is generally more realistic in an uncertain world, where avoiding both unnecessary volatility in financial markets and policy errors and flip flops are considerations.

Sometimes, shocks come along that are so significant, and muddy the waters so much, that you simply can't trust any policy rule to prescribe an appropriate response given risks to the inflation outlook. That is, when it comes to monetary policy implementation, it might be justified to bend or break the rules. But in less exceptional times, following the rules can provide stability, predictability and efficiency, which all carry broader economic benefits – at least that's what proponents of rule-based policy implementation will tell you.

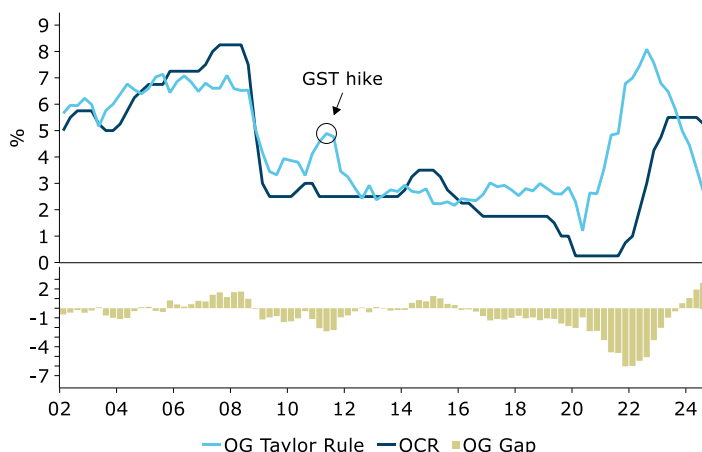
In reality, however, central bankers would never rely on something as simple as a Taylor Rule to mechanically tell them what to do – they have far more sophisticated models for that and other judgements and risks to weigh up too. But Taylor Rules can still provide a guide on whether what they are doing is consistent with the data and assumptions in front of them at the time, and if not, challenge them to justify why 'this time is different'. We can use Taylor Rules to draw a line in the sand from which we can compare the RBNZ's past and signalled policy choices. A good rule will typically move closely with the OCR over time, but no rule will be able to do this perfectly and consistently. Monetary policy making simply isn't that mechanical, and sometimes the rules of the game can change. For example, when facing the "effective lower bound" (ELB) – when conventional monetary policy has run out of road – an ELB-based rule might provide a better fit.

The literature on Taylor Rules is vast. For our purposes, we stick to the relatively simple formulations and rely on research undertaken by the RBNZ and others to calibrate the rules that follow.

Taylor Rules for New Zealand

Let's kick off with the original (OG) Taylor rule, noting that this fits into the 'non-inertial' category, meaning it's going to be at the more responsive end of the spectrum. We calculate all our rules from 2002 as that's when the Policy Targets Agreement first moved to a focus on (or around) 2% inflation. And to bring our rules up to the present we plug in the RBNZ's Q3 forecasts for CPI inflation, the output gap, and the neutral OCR. We'll get into the medium-term forecasts in more detail later.

Figure 1. The OG Taylor Rule



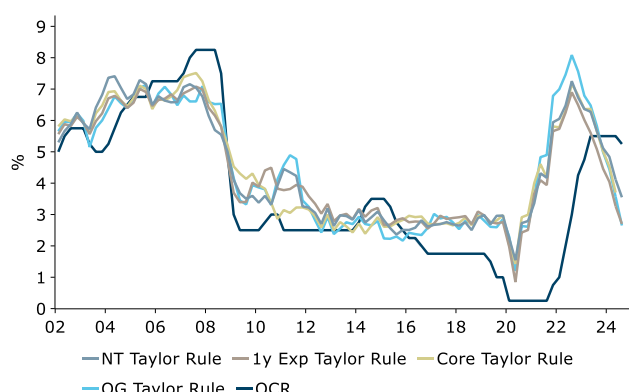
Source: Stats NZ, RBNZ, Macrobond, ANZ Research

Clearly, the above specification suggests that the RBNZ's *least regrets* approach to the pandemic was a significant deviation from the OG Taylor Rule. The RBNZ cut the OCR to 0.25% by mid-2020 and left it there until late 2021. Conversely, this rule prescribes hikes from early 2021 to a peak of around 8% by Q3 2022. In practice, OCR hikes, while about as fast as the OG rule prescribed, came about a year later than that and peaked around 250bp lower.

More recently, the RBNZ has kept the OCR at a more restrictive level than the OG rule. Indeed, according to this specification, the OCR should now be around 2.5-3%. But this is just one (relatively gung-ho) specification. Figure 2 shows a bunch of equivalent Taylor Rule specifications that switch out current inflation with core inflation, inflation expectations, and non-tradable inflation (for non-tradable inflation we define the target as 3% rather than 2%). These specifications are a better representation of the RBNZ's well-founded and well-understood preference to "look through" temporary shocks such as the one-off increase in the rate of GST or the exchange rate.

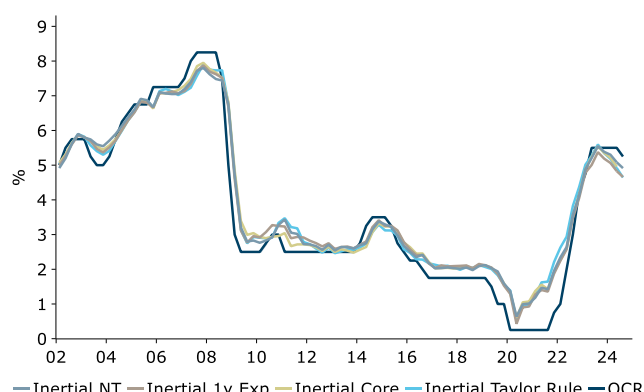
But more significant than the choice of inflation measure in terms of improving the historical fit is the inclusion of policy inertia, ie smoothing the policy response (figure 3). The real-life smoothness of the policy response reflects both uncertainty and the desire to avoid causing unnecessary financial market volatility. Indeed, the RBNZ's remit includes avoiding unnecessary instability in interest rates and exchange rates. Such an approach will inevitably make policy settings a little later to the party than is "ideal", but potentially avoids several wrong turns along the way.

Figure 2. Non-inertial Taylor Rules



Source: Stats NZ, RBNZ, Macrobond, ANZ Research

Figure 3. Inertial Taylor Rules

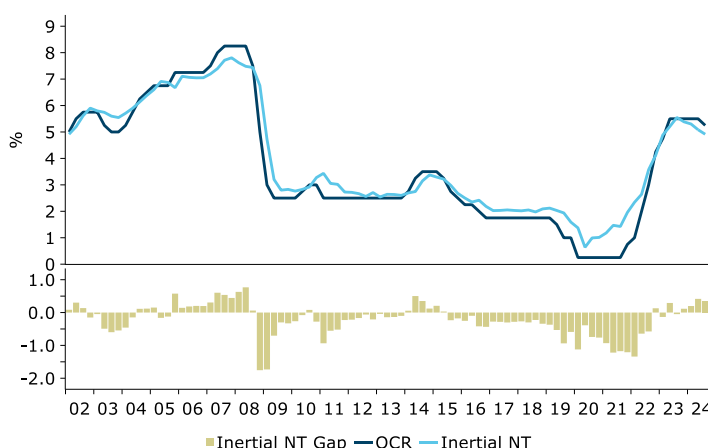


Source: Stats NZ, RBNZ, Macrobond, ANZ Research

From here on in, we'll focus only on inertial rules, given this is how central banks roll. Of these rules, the two that are closest to the actual OCR over time are the core (Sector Factor Model) and the non-tradable inflation measures (the latter with 3% for the inflation target). As at Q3 (plugging in the RBNZ's August MPS forecasts) the non-tradable rule was sitting a little more than 30bp below the OCR. In other words, if the OCR had followed this particular rule precisely, the RBNZ would have delivered 50bp of cuts by now, rather than 25bp. What about the core inflation rule? We won't have core inflation for Q3 until 16 October, but as of Q2 this rule was prescribing an OCR of 5.0% vs the 5.5% maintained by the RBNZ. Because we have forecasts for non-tradable inflation and not core inflation, we'll focus on the non-tradable inertial rule from here.

Figure 4 shows the inertial non-tradables rule and how policy has deviated from it (note: we are not claiming that this rule should have been followed to the letter, as there have been significant risks and uncertainties to weigh up – but it is a stake in the ground).

Figure 4. Non-tradables inertial rule vs OCR



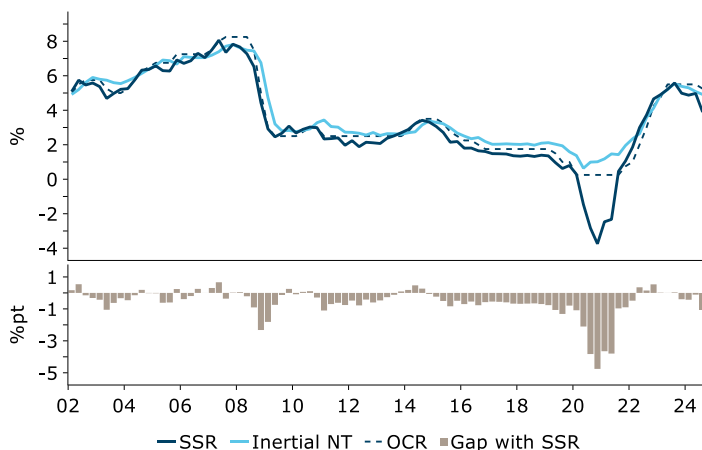
Source: Stats NZ, RBNZ, Macrobond, ANZ Research

Clearly, even with our better-fitting measures there’s still a wide and persistent gap between the inertial rule and actual OCR settings over 2021 and 2022 (around 100bp on average). But of course, the RBNZ’s stimulatory efforts didn’t stop at conventional monetary policy (the OCR):

- the RBNZ deployed unusually firm “forward guidance” in March 2020, noting that the OCR will remain at 0.25% for at least 12 months, while also preparing to take the OCR into negative territory. Together, that was a very clear signal that rates were going to stay low for a long time.
- unconventional monetary policy tools were deployed, such as the [Large Scale Asset Purchase programme](#) and [Funding for Lending programme](#).

Accounting for the impact of unconventional monetary policy is no easy feat, but the Shadow Short Rate (SSR) has a crack. The SSR is a proxy for the effective policy rate after taking into account the impact of unconventional monetary policy. It can take on a negative value when the OCR is near the effective lower bound, providing a better sense of how much stimulus the RBNZ is deploying via unconventional monetary policy.¹ Figure 5 shows that once we factor in unconventional monetary stimulus, the gap between the RBNZ’s policy response and the inertial non-tradables rule becomes significantly wider through the post pandemic era, with the “peak gap” over this period widening from around 130bp of above-rule stimulus to around 475bp. That’s next level!

Figure 5. Inertial non-tradable rule vs Shadow Short Rate

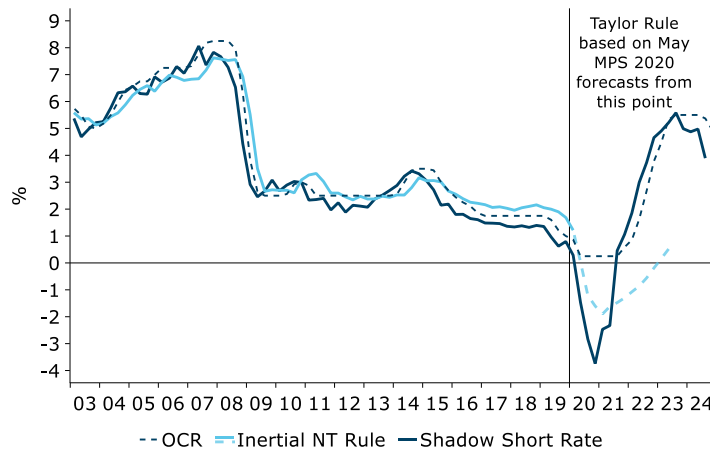


Source: Stats NZ, RBNZ, LJKmfa, Macrobond, ANZ Research

¹ The SSR was developed by Dr Leo Krippner. For more info see [here](#).

To be clear, we're not saying that the RBNZ was wrongheaded to respond as they initially did to the pandemic. If we plug their May 2020 forecasts into our inertial non-tradables rule, noting that this was around the time of peak pandemic uncertainty (and that our broad economic outlook at the time was similarly dire), the rule prescribes a policy response much closer to how much stimulus was delivered. Of course, those forecasts turned out to be well off the mark, meaning the resulting stimulus was still way too much, but at the time it was entirely justifiable.

Figure 6. Inertial non-tradable rule using May MPS 2020 forecasts

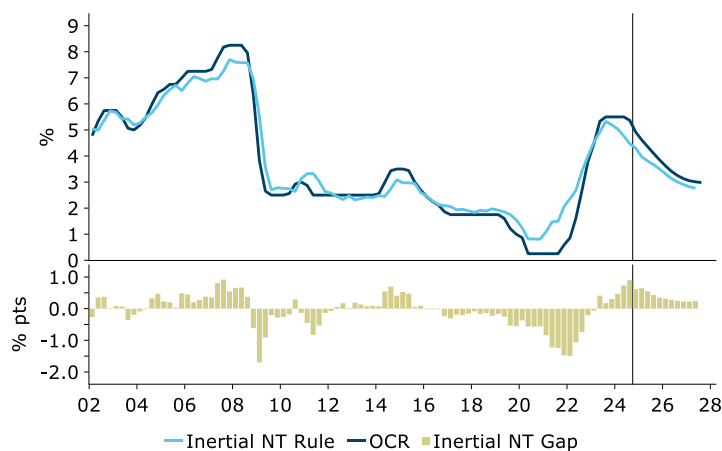


Source: Stats NZ, LJKmfa, RBNZ, Macrobond, ANZ Research

Note that for Q3 2024, the SSR was a decent clip below the OCR (figure 5, previous page), reflecting that market expectations of outsized OCR cuts in coming meetings have created easier-than-otherwise monetary conditions. We noted previously that the OCR was around 30bp *above* our internal non-tradables rule – but the SSR is around 100bp *below* it! That certainly waters down the Taylor Rule's prescription for imminent outsized OCR cuts. But it's circular, of course: a failure to deliver those expected outsized cuts would cause term rates and the SSR to increase.

While bearing in mind we've just illustrated how unreliable a Taylor Rule based on forecast assumptions can be, let's now plug the RBNZ's latest forecasts into our rules.²

Figure 7. Inertial non-tradable Taylor Rule using RBNZ forecasts



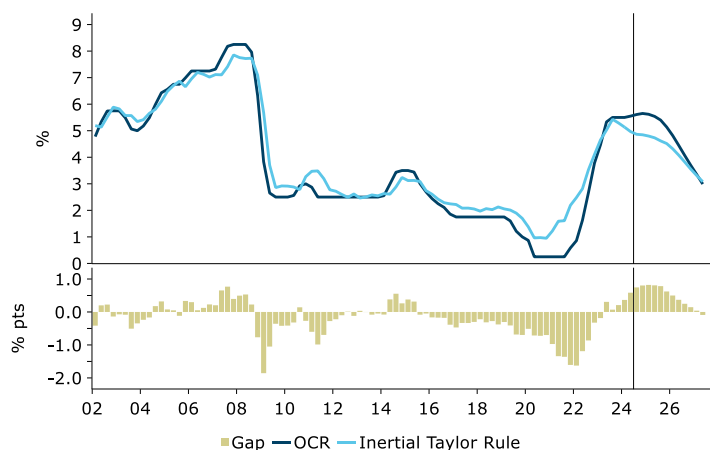
Source: Stats NZ, RBNZ, Macrobond, ANZ Research

² Note: The RBNZ's OCR forecasts are provided on a quarter average basis (vs the quarter-end we have been using to date). This will have a small impact on how far away our rule is from the OCR in a given quarter. That may introduce more or less "policy urgency" in a particular quarter, but doesn't change the overall story.

Of note, the RBNZ's August forecast OCR sits above this rule over the entire forecast, narrowing from around 60bp by the end of 2024 to around 25bp by early 2028. That persistent above-rule tightness is at odds with the years leading up to the pandemic, when the OCR was slightly below this rule, but back then the risk of inflation undershooting target and the OCR reaching the effective lower bound were larger considerations. If the RBNZ were to follow this rule to the letter (assuming all the forecast inputs are bang on, which they inevitably will not be), they'd need to deliver 50bp cuts in both October and November to close the gap, which is now our forecast.

While the "forecast gap" is not unusually wide, it could reflect a judgement that non-tradables inflation will be hard to tame going forward (eg as a result of stickiness in some components of the CPI, such as council rates and insurance). As confidence in the disinflation outlook increases over time, it's possible that the RBNZ will make incremental changes to signalled OCR cuts to reflect the changing risk profile. Indeed, if we go back to the May MPS (when the RBNZ's OCR forecast implied decent odds of a hike) the August forecast narrowed the near-term gap between the signalled OCR and the inertial non-tradable inflation rule by 20-30bp. In other words, between the May MPS and August MPS, the RBNZ moved closer to our rule because of judgements, rather than data surprises. Perhaps it has further to go.

Figure 8. Inertial non-tradable Taylor Rule using May 2024 RBNZ forecasts



Source: Stats NZ, RBNZ, Macrobond, ANZ Research

At the end of the day, the accuracy of the forecasts feeding into these rules is likely going to swamp everything else in terms of conclusions about how far the RBNZ might be 'behind the curve'. That is, the data is inevitably going to surprise to some extent, and the RBNZ is going to react to that.

Projected Taylor Rules using forecasts won't just be thrown around by inevitable forecast misses on the inflation and spare capacity front. Uncertainty around where the neutral OCR is (and will be) is also critical.

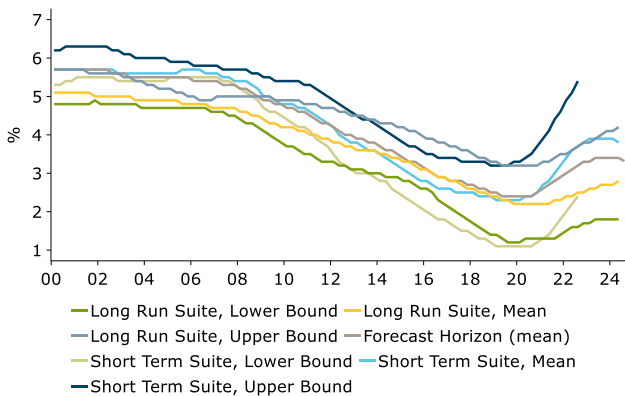
The neutral OCR is the level of the OCR that's considered neither stimulatory nor contractionary (if nothing else were going on). That is, it's the goldilocks OCR that's consistent with stable inflation, and where we can expect the OCR to settle once any supply-demand imbalances in the economy are resolved and the economy is in equilibrium (which of course it never reaches in practice, as life keeps getting in the way). You can think of neutral as being the rate that brings balance between aggregate savings and investment demand, which in turn is a function of all manner of things including demographics, risk appetite, expectations for incomes and profits, technological change and adaptation, access to global capital markets and trade, institutional arrangements, regulatory settings; the list goes on.

The neutral OCR varies over time, because all the things described above do. It is also unobservable, and is a key ingredient for all Taylor Rule specifications.

The RBNZ produces a range of neutral estimates, but as a general rule, estimates for where neutral is or will be in the future are far less certain than estimates of where it's been, given you can at least observe how inflation turned out over history. So far, all our Taylor Rules have used the RBNZ's central estimate used in their forecasts and projected that forward to wherever they have said neutral is assumed to settle over the longer run (eg that's currently 2.75%). Now we take a look at how our Taylor Rule might change if we change the neutral assumption.

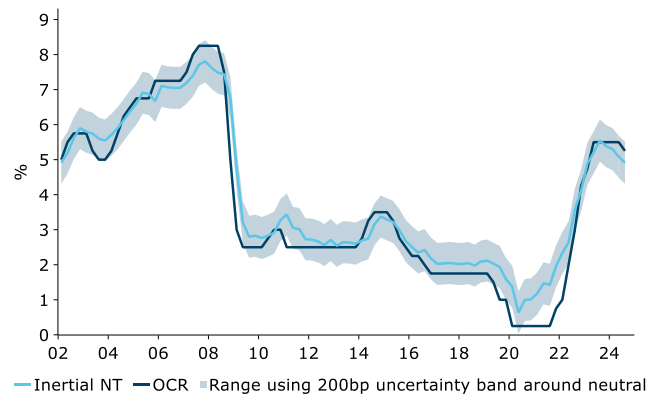
Based on the most recent estimates provided by the RBNZ, neutral could be pretty much anywhere. Figure 10 shows that if we plug in a range on either side of neutral ($\pm 200\text{bp}$, which is close to the range presented by the RBNZ in mid-2022), our Taylor Rule comes in at a range between 5.5% and 4.3% as at Q3 2024. This highlights how this one assumption can have very meaningful implications for where our rule suggests policy should be. It also highlights the layers of uncertainty the RBNZ is always operating under every time the Committee meet to set the OCR. Good thing monetary policy is a repeat game!

Figure 9. RBNZ's neutral estimates



Source: RBNZ, Macrobond, ANZ Research

Figure 10. Inertial non-tradable rule with neutral uncertainty bands



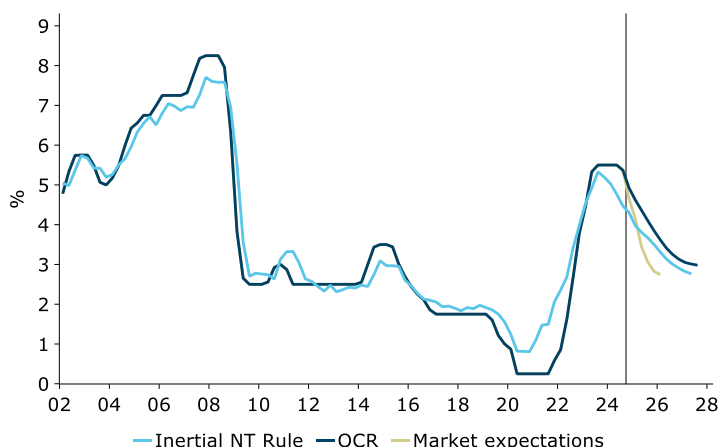
Source: RBNZ, Macrobond, ANZ Research

Implications and summary

So what does this all tell us about the path for monetary policy?

First, the elephant in the room: not one of our Taylor Rules currently sit above the current level of the OCR, and based on the August MPS forecasts, are not going to any time soon. Even our closest-fitting inertial rules suggest that the gap vs the RBNZ's August OCR forecast could be as wide as 50-75bp by the end of the year. However, that gap could quickly be closed by delivering 50bp cuts in October and November, which is our forecast. What's also true is that the easing in monetary conditions that has already occurred in anticipation of outsized OCR cuts (figure 11, over page) means the RBNZ needn't be worried about the potential impacts on the real economy and inflation outlook of not having delivered more cuts already at this stage (all else equal).

Figure 11. Inertial non-tradables rule vs RBNZ forecast and market pricing



Source: Stats NZ, Bloomberg, RBNZ, Macrobond, ANZ Research

When we use the SSR to put the post-pandemic unconventional monetary policy response into perspective, it's clear that the RBNZ injected way more stimulus into the economy than a policy rule (which has the benefit of hindsight) suggests was appropriate (recalling part of that was because the RBNZ couldn't foresee the amount of fiscal stimulus that eventually came to pass). But when we use the RBNZ's forecasts from the time of peak uncertainty, the goliath policy response followed the inertial rules much more closely. In other words, the RBNZ didn't depart from the rules *given the information available at the time* as much as some may argue with the benefit of hindsight on their side. Yes, they overstimulated, but that was due more to inaccurate forecasts than an unusual response to those forecasts.

At the end of the day, whatever the cause, the question now is whether policy needs to remain more restrictive than currently prescribed by policy rules as penance for that overstimulation. The answer to this question cannot be revealed by a projected Taylor Rule using forecasts – because inevitably those forecasts will be wrong. But if we assume for a moment that the pandemic has led to a shift in the economy, leaving the neutral OCR on the higher side of central estimates, then it makes sense to be running policy a little above where a reasonable Taylor Rule might suggest. On the other hand, if inflation expectations are anchored and neutral isn't on the rise, then cutting more aggressively could easily be justified. The data will eventually reveal which world we're in.

But running policy tighter than otherwise now just because past inflation was high doesn't hold water. With a forward-looking inflation target, bygones are bygones unless inflation expectations prove sticky. The RBNZ will not (and should not) aim for below-target inflation just because we've been through a period of significantly above-target inflation. Policy will continue to be tweaked as data dictates, and if inflation goes under target, the RBNZ will start to worry about effective lower bound risks.

Here and now, it's fair to say that all Taylor Rules suggest it is appropriate for the RBNZ to be easing monetary policy. And, conditional on the RBNZ's forecasts and neutral rate assumptions, all Taylor Rules are prescribing something a little more aggressive than the path signalled in the August MPS (but that's nothing a couple of 50bp cuts can't fix). However, the SSR and recent easing in monetary conditions (given markets already expect outsized cuts) suggests that the urgency is not great. Further, just because inflation risks are feeling a little more balanced now (meaning it might be appropriate to remove positive judgement from the OCR track – if there is any as our simple rules imply), that doesn't mean upside inflation risks have gone away. While it might look like the RBNZ is a little bit behind the curve right now, we're only ever one significant data surprise away from the RBNZ looking like they are ahead of it.

Appendix: further reading

The following links provide additional information, and in some cases have informed how we have calibrated the rules presented in this note.

John Taylor's OG Taylor Rule paper: [Discretion versus policy rules in practise](#).

RBNZ note: [Estimated Taylor Rules updated for the postcrisis period](#).

US Federal Reserve note: [An Overview of Simple Policy Rules and their Use in Policymaking in Normal Times and Under Current Conditions](#).

US Federal Reserve resource: [Monetary Policy Principles and Practice](#).

See this link for more on [Dr Leo Krippner's Shadow Short Rate](#).



Contact us

Meet the team

We welcome your questions and feedback. Click [here](#) for more information about our team.



Sharon Zollner
Chief Economist

Follow Sharon on X
@sharon_zollner

Telephone: +64 9 357 4094
Email: sharon.zollner@anz.com

General enquiries:
research@anz.com

Follow ANZ Research
@ANZ_Research (global)



David Croy
Senior Strategist

Market developments, interest rates, FX, unconventional monetary policy, liaison with market participants.

Telephone: +64 4 576 1022
Email: david.croy@anz.com



Susan Kilsby
Agricultural Economist

Primary industry developments and outlook, structural change and regulation, liaison with industry.

Telephone: +64 21 633 469
Email: susan.kilsby@anz.com



Miles Workman
Senior Economist

Macroeconomic forecast co-ordinator, economic developments, labour market dynamics, inflation, fiscal and monetary policy.

Telephone: +64 21 661 792
Email: miles.workman@anz.com



Henry Russell
Economist

Macroeconomic forecasting, economic developments, GDP and activity dynamics and monetary policy.

Telephone: +64 21 629 553
Email: henry.russell@anz.com



Natalie Denne
PA / Desktop Publisher

Business management, general enquiries, mailing lists, publications, chief economist's diary.

Telephone: +64 21 253 6808
Email: natalie.denne@anz.com



Kyle Uerata
Economic Statistician

Economic statistics, ANZ proprietary data (including ANZ Business Outlook), data capability and infrastructure.

Telephone: +64 21 633 894
Email: kyle.uerata@anz.com

Important notice

Last updated: 20 February 2024

The opinions and research contained in this document (in the form of text, image, video or audio) are (a) not personal financial advice nor financial advice about any product or service; (b) provided for information only; and (c) general in nature and do not take into account your financial situation or goals.

This document may be restricted by law in certain jurisdictions. Recipients must observe all relevant restrictions.

Disclaimer for all jurisdictions: This document is prepared by ANZ Bank New Zealand Limited (ANZ Centre, 23-29 Albert Street, Auckland 1010, New Zealand). This document is distributed in your country/region by Australia and New Zealand Banking Group Limited (ABN11 005 357 522) (**ANZ**), a company incorporated in Australia or (if otherwise stated), by its subsidiary or branch (herein collectively referred to as **ANZ Group**). The views expressed in it are those of ANZ Economics and Markets Research, an independent research team of ANZ Bank New Zealand Limited.

This document is distributed on the basis that it is only for the information of the specified recipient or permitted user of the relevant website (**recipients**).

This document is solely for informational purposes and nothing in it is intended to be an invitation, solicitation or offer by ANZ Group to sell, or buy, receive or provide any product or service, or to participate in a particular trading strategy.

Distribution of this document to you is only as may be permissible by the laws of your jurisdiction, and is not directed to or intended for distribution or use by recipients resident or located in jurisdictions where its use or distribution would be contrary to those laws or regulations, or in jurisdictions where ANZ Group would be subject to additional licensing or registration requirements. Further, any products and services mentioned in this document may not be available in all countries.

ANZ Group in no way provides any personal financial, legal, taxation or investment advice to you in connection with any product or service discussed in this document. Before making any investment decision, recipients should seek independent financial, legal, tax and other relevant advice having regard to their particular circumstances.

Whilst care has been taken in the preparation of this document and the information contained within is believed to be accurate and made on reasonable grounds on the date it was published, ANZ Group does not represent or warrant the accuracy or completeness of the information. Further, ANZ Group does not accept any responsibility to inform you of any matter that subsequently comes to its notice, which may affect the accuracy of the information in this document.

This document may contain forward looking statements or opinions including statements regarding our intent, belief or current expectations regarding economic and market conditions, financial instruments and credit markets. Such statements are usually predictive in character, may not be accurate once the future becomes known and should not be relied upon when making investment decisions. Past performance is not a reliable indicator of future performance. ANZ does not accept any responsibility to inform you of any revisions to these forward-looking statements to reflect events or circumstances occurring after the date of this document.

Preparation of this document and the opinions expressed in it may involve material elements of subjective judgement and analysis. Unless specifically stated otherwise: they are current on the date of this document and are subject to change without notice; and, all price information is indicative only. Any opinions expressed in this document are subject to change at any time without notice.

ANZ Group does not guarantee the performance of any product mentioned in this document. All investments entail a risk and may result in both profits and losses. Any products and services described in this document may not be suitable for all investors, and transacting in these products or services may be considered risky.

ANZ Group expressly disclaims any responsibility and shall not be liable for any loss, damage, claim, liability, proceedings, cost or expense (**Liability**) arising directly or indirectly and whether in tort (including negligence), contract, equity or otherwise out of or in connection with this document to the extent permissible under relevant law. The contents of this document have not been reviewed by any regulatory body or authority in any jurisdiction.

ANZ Group may have an interest in the subject matter of this document. They may receive fees from customers for dealing in any products or services described in this document, and their staff and introducers of business may share in such fees or remuneration that may be influenced by total sales, at all times received and/or apportioned in accordance with local regulatory requirements. Further, they or their customers may have or have had interests or long or short positions in any products or services described in this document, and may at any time make purchases and/or sales in them as principal or agent, as well as act (or have acted) as a market maker in such products. This document is published in accordance with ANZ Group's policies on conflicts of interest and ANZ Group maintains appropriate information barriers to control the flow of information between businesses within the group.

Your ANZ Group point of contact can assist with any questions about this document including for further information on these disclosures of interest.

Australia. ANZ holds an Australian Financial Services licence no. 234527. For a copy of ANZ's Financial Services Guide please [click here](#) or request from your ANZ point of contact.

Brazil. This document is distributed on a cross border basis and only following request by the recipient. No securities are being offered or sold in Brazil under this document, and no securities have been and will not be registered with the Securities Commission - CVM.

Brunei, Japan, Kuwait, Malaysia, Switzerland, Taiwan. This document is distributed in each of these jurisdictions by ANZ on a cross-border basis.

Cambodia. The information contained in this document is confidential and is provided solely for your use upon your request. This does not constitute or form part of an offer or solicitation of any offer to engage services, nor should it or any part of it form the basis of, or be relied in any connection with, any contract or commitment whatsoever. ANZ does not have a licence to undertake banking operations or securities business or similar business, in Cambodia. By requesting financial services from ANZ, you agree, represent and warrant that you are engaging our services wholly outside of Cambodia and subject to the laws of the contract governing the terms of our engagement.

Canada. This document is general information only, is intended for institutional use only – not retail, and is not meant to be tailored to the needs and circumstances of any recipient. In addition, this document is not intended to be an offer or solicitation to purchase or sell any security or other financial instrument or to employ a specific investment strategy.

Chile. You understand and agree that ANZ is not regulated by Chilean Authorities and that the provision of this document is not subject to any Chilean supervision and is not guaranteed by any regulatory or governmental agency in Chile.

Fiji. For Fiji regulatory purposes, this document and any views and recommendations are not to be deemed as investment advice. Fiji investors must seek licensed professional advice should they wish to make any investment in relation to this document.

Hong Kong. This document is issued or distributed in Hong Kong by the Hong Kong branch of ANZ, which is registered at the Hong Kong Monetary Authority to conduct Type 1 (dealing in securities), Type 4 (advising on securities) and Type 6 (advising on corporate finance) regulated activities. The contents of this document have not been reviewed by any regulatory authority in Hong Kong. If you are in any doubt about any of the contents of this document, you should obtain independent professional advice.

Important notice

India. If this document is received in India, only you (the specified recipient) may print it provided that before doing so, you specify on it your name and place of printing.

Israel. ANZ is not a holder of a licence granted in Israel pursuant to the Regulation of Investment Advising, Investment Marketing and Portfolio Management Law, 1995 ("Investment Advice Law") and does not hold the insurance coverage required of a licensee pursuant to the Investment Advice Law. This publication has been prepared exclusively for Qualified Clients as such term is defined in the First Schedule to the Investment Advice Law. As a prerequisite to the receipt of a copy of this publication a recipient will be required to provide confirmation and evidence that it is a Qualified Client. Nothing in this publication should be considered Investment Advice or Investment Marketing as defined in the Investment Advice Law. Recipients are encouraged to seek competent investment advice from a locally licensed investment adviser prior to making any investment.

Macau. Click [here](#) to read the disclaimer for all jurisdictions in Mandarin. 澳门. 点击[此处](#)阅读所有司法管辖区的免责声明的中文版。

Myanmar. This document is intended to be general and part of ANZ's customer service and marketing activities when implementing its functions as a licensed bank. This document is not Securities Investment Advice (as that term is defined in the Myanmar Securities Transaction Law 2013).

New Zealand. This document is distributed in New Zealand by ANZ Bank New Zealand Limited. The material is for information purposes only and is not financial advice about any product or service. We recommend you seek advice about your financial situation and goals before acquiring or disposing of (or not acquiring or disposing of) a financial product.

Oman. ANZ neither has a registered business presence nor a representative office in Oman and does not undertake banking business or provide financial services in Oman. Consequently ANZ is not regulated by either the Central Bank of Oman (**CBO**) or Oman's Capital Market Authority (**CMA**). The information contained in this document is for discussion purposes only and neither constitutes an offer of securities in Oman as contemplated by the Commercial Companies Law of Oman (Royal Decree 4/74) or the Capital Market Law of Oman (Royal Decree 80/98), nor does it constitute an offer to sell, or the solicitation of any offer to buy non-Omani securities in Oman as contemplated by Article 139 of the Executive Regulations to the Capital Market Law (issued vide CMA Decision 1/2009). ANZ does not solicit business in Oman and the only circumstances in which ANZ sends information or material describing financial products or financial services to recipients in Oman, is where such information or material has been requested from ANZ and the recipient understands, acknowledges and agrees that this document has not been approved by the CBO, the CMA or any other regulatory body or authority in Oman. ANZ does not market, offer, sell or distribute any financial or investment products or services in Oman and no subscription to any securities, products or financial services may or will be consummated within Oman. Nothing contained in this document is intended to constitute Omani investment, legal, tax, accounting or other professional advice.

People's Republic of China (PRC). This document may be distributed by either ANZ or Australia and New Zealand Bank (China) Company Limited (**ANZ China**). Recipients must comply with all applicable laws and regulations of PRC, including any prohibitions on speculative transactions and CNY/CNH arbitrage trading. If this document is distributed by ANZ or an Affiliate (other than ANZ China), the following statement and the text below is applicable: No action has been taken by ANZ or any affiliate which would permit a public offering of any products or services of such an entity or distribution or re-distribution of this document in the PRC. So, the products and services of such entities are not being offered or sold within the PRC by means of this document or any other document. This document may not be distributed, re-distributed or published in the PRC, except under circumstances that will result in compliance with any applicable laws and regulations. If and when the material accompanying this document relates to the products and/or services of ANZ China, the following statement and the text below is applicable: This document is distributed by ANZ China in the Mainland of the PRC.

Peru. The information contained in this document has not been, and will not be, registered with or approved by the Peruvian Superintendency of the Securities Market (Superintendencia del Mercado de Valores, **SMV**) or the Lima Stock Exchange (Bolsa de Valores de Lima, **BVL**) or under the Peruvian Securities Market Law (Legislative Decree 6 861), and will not be subject to Peruvian laws applicable to public offerings in Peru. To the extent this information refers to any securities or interests, it should be noted the securities or interests may not be offered or sold in Peru, except if (i) such securities or interests were previously registered with the Peruvian Superintendency of the Securities Market, or (ii) such offering is considered a private offering in Peru under the securities laws and regulation of Peru.

Qatar. This document has not been, and will not be:

- lodged or registered with, or reviewed or approved by, the Qatar Central Bank (**QCB**), the Qatar Financial Centre (**QFC**) Authority, QFC Regulatory Authority or any other authority in the State of Qatar (**Qatar**); or
- authorised or licensed for distribution in Qatar, and the information contained in this document does not, and is not intended to, constitute a public offer or other invitation in respect of securities in Qatar or the QFC.

The financial products or services described in this document have not been, and will not be:

- registered with the QCB, QFC Authority, QFC Regulatory Authority or any other governmental authority in Qatar; or
- authorised or licensed for offering, marketing, issue or sale, directly or indirectly, in Qatar.

Accordingly, the financial products or services described in this document are not being, and will not be, offered, issued or sold in Qatar, and this document is not being, and will not be, distributed in Qatar. The offering, marketing, issue and sale of the financial products or services described in this document and distribution of this document is being made in, and is subject to the laws, regulations and rules of, jurisdictions outside of Qatar and the QFC. Recipients of this document must abide by this restriction and not distribute this document in breach of this restriction. This document is being sent/issued to a limited number of institutional and/or sophisticated investors (i) upon their request and confirmation that they understand the statements above; and (ii) on the condition that it will not be provided to any person other than the original recipient, and is not for general circulation and may not be reproduced or used for any other purpose.

Singapore. To the extent that this document contains any statements of opinion and/or recommendations related to an investment product or class of investment product (as defined in the Financial Advisers Act 2001), this document is distributed in Singapore by ANZ solely for the information of "accredited investors", "expert investors" or (as the case may be) "institutional investors" (each term as defined in the Securities and Futures Act 2001 of Singapore). ANZ is licensed in Singapore under the Banking Act 1970 of Singapore and is exempted from holding a financial adviser's licence under Section 23(1)(a) of the Financial Advisers Act 2001 of Singapore. In respect of any matters arising from, or in connection with, the distribution of this document in Singapore, please speak to your usual ANZ contact in Singapore.

United Arab Emirates (UAE). This document is distributed in the UAE or the Dubai International Financial Centre (**DIFC**) (as applicable) by ANZ. This document does not, and is not intended to constitute: (a) an offer of securities anywhere in the UAE; (b) the carrying on or engagement in banking, financial and/or investment consultation business in the UAE under the rules and regulations made by the Central Bank of the UAE, the Emirates Securities and Commodities Authority or the UAE Ministry of Economy; (c) an offer of securities within the meaning of the Dubai International Financial Centre Markets Law (**DIFCML**) No. 12 of 2004; and (d) a financial promotion, as defined under the DIFCML No. 1 of 200. ANZ DIFC Branch is regulated by the Dubai Financial Services Authority (**DFSA**). The financial products or services described in this document are only available to persons who qualify as "Professional Clients" or "Market Counterparty" in accordance with the provisions of the DFSA rules.

Important notice

United Kingdom. This document is distributed in the United Kingdom by Australia and New Zealand Banking Group Limited (**ANZ**) solely for the information of persons who would come within the Financial Conduct Authority (**FCA**) definition of “eligible counterparty” or “professional client”. It is not intended for and must not be distributed to any person who would come within the FCA definition of “retail client”. Nothing here excludes or restricts any duty or liability to a customer which ANZ may have under the UK Financial Services and Markets Act 2000 or under the regulatory system as defined in the Rules of the Prudential Regulation Authority (**PRA**) and the FCA.

ANZ considers this document to constitute an Acceptable Minor Non-Monetary Benefits (**AMNMB**) under the relevant inducement rules of the FCA. ANZ is authorised in the United Kingdom by the PRA and is subject to regulation by the FCA and limited regulation by the PRA. Details about the extent of our regulation by the PRA are available from us on request.

United States. Except where this is a FX-related document, this document is distributed in the United States by ANZ Securities, Inc. (**ANZ SI**) which is a member of the Financial Regulatory Authority (**FINRA**) (www.finra.org) and registered with the SEC. ANZSI’s address is 277 Park Avenue, 31st Floor, New York, NY 10172, USA (Tel: +1 212 801 9160 Fax: +1 212 801 9163). ANZSI accepts responsibility for its content. Information on any securities referred to in this document may be obtained from ANZSI upon request. This document or material is intended for institutional use only – not retail. If you are an institutional customer wishing to effect transactions in any securities referred to in this document you must contact ANZSI, not its affiliates. ANZSI is authorised as a broker-dealer only for institutional customers, not for US Persons (as “US person” is defined in Regulation S under the US Securities Act of 1933, as amended) who are individuals. If you have registered to use our website or have otherwise received this document and are a US Person who is an individual: to avoid loss, you should cease to use our website by unsubscribing or should notify the sender and you should not act on the contents of this document in any way. Non-U.S. analysts may not be associated persons of ANZSI and therefore may not be subject to FINRA Rule 2242 restrictions on communications with the subject company, public appearances and trading securities held by the analysts. Where this is a FX-related document, it is distributed in the United States by ANZ’s New York Branch, which is also located at 277 Park Avenue, 31st Floor, New York, NY 10172, USA (Tel: +1 212 801 916 0 Fax: +1 212 801 9163).

Vietnam. This document is distributed in Vietnam by ANZ or ANZ Bank (Vietnam) Limited, a subsidiary of ANZ.