



Ben Walker  
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Irene Pietropaoli  
Business & Human Rights Resource Centre  
1-3 Charlotte Street, Third floor  
London, W1T 1RD  
United Kingdom

Dear Ms Pietropaoli,

Thank you for your email received 4 December 2014 regarding ANZ's entrance into Myanmar and your concerns about human rights issues.

#### **ANZ and Myanmar**

ANZ opened its representative office in Yangon, Myanmar in March 2013. We applied for and were granted a banking license to operate a single branch in Myanmar in October 2014. Approval was granted by the Central Bank of Myanmar allowing us to provide banking services to foreign companies operating in Myanmar and local financial institutions.

We plan to be operational in September 2015 and will offer standard product and services including lending, trade finance, deposits & payments, Spot foreign exchange and others that are permitted by the Central Bank of Myanmar.

#### **Our commitment to responsible business lending in Asia and the Pacific**

We finance some socially and environmentally sensitive industries, and our increasing presence in Asia and the Pacific means doing business in some countries with developing legal and governance frameworks. Our aim is make balanced, informed and transparent decisions and work with our customers to help them improve their management of business, social and environmental risks.

Our approach is supported by policies and guidelines, screening tools and resources, and employee training and education. Our approach, and the decisions that we make are wherever possible informed by stakeholder engagement.

#### **ANZ's approach to human rights**

In 2010 ANZ published "Respecting people and communities: ANZ's approach to human rights", which is a set of standards that guide how we interact and promote a culture of respect with employees, customers and communities.

Our standards complement our support for the UN Global Compact, OECD Guidelines for Multinational Enterprises and our application of the Equator Principles to all project finance transactions. They also articulate our commitment to monitor and manage our customers' performance in protecting and promoting human rights, and for us to consider human rights impacts when evaluating prospective clients.



Our human rights standards are embedded in our client screening tools, our 'sensitive sector' lending policies and training initiatives that support and guide our business lending decisions. Social and environmental risk training is mandatory for all relevant International and Institutional employees who have approval to make credit decisions. The training includes a module designed to improve understanding and application of our human rights standards in decision making.

<http://www.anz.com/about-us/corporate-responsibility/framework/responsible-practices/human-rights/>

### **ANZ policies consider our customers' social and environmental impacts**

ANZ's sensitive sector policies ensure social and environmental considerations are incorporated into our financing and lending decisions. We have six sensitive sector policies covering the energy, extractives, forests and forestry, hydropower, military equipment and water sectors. Through our sensitive sector policies, we support customers who:

- Demonstrate a balanced approach to the social, environmental and developmental impacts of their business;
- Adopt management practices to continuously improve their social and environmental performance; and
- Adopt internationally accepted industry management practices to manage social, environmental and economic impacts (including affects on human rights, biodiversity, cultural heritage, indigenous rights, health and safety, and governance).

In 2014, we completed a review of the energy and extractive industry policies. The remaining sensitive sector policies will be reviewed in 2015.

<http://www.anz.com/about-us/corporate-responsibility/customers/responsible-business-lending/policies-guidelines/sector-policies/>

### **Codes of Conduct and Ethics**

Our responsible business lending policies and approach is supported by our Codes of Conduct and Ethics. Our employee Code of Conduct and Ethics applies to everyone who works at ANZ. The Code is supported by a number of more detailed policies that form part of the Conduct and Ethics Policy Framework. These cover issues such as anti-bribery, fraud and corruption, equal opportunity, discrimination, bullying and harassment, conflicts of interest and work expenses. The Equal Opportunity, Bullying and Harassment Policy summary is available on ANZ.com and outlines our firm belief in the right of all people to work in an environment that is harmonious and free from discrimination or harassment, workplace bullying and victimisation.

We encourage our banking partners (such as suppliers, related bodies corporate, joint venture partners or companies in which ANZ is a strategic investor) to adopt and maintain similar conduct and ethics principles to those outlined in our Codes.

As we grow our business and expand in new markets, it is essential that our people understand and act upon our employee Code of Conduct and Ethics.

<http://www.anz.com/resources/c/5/c5be330045ddd7ab8fbbef48799fdafa/EEO.pdf?MOD=AJPERES>

### **Monitoring compliance with our Codes of Conduct**

Compliance with our Code of Conduct and Ethics is embedded in ANZ employment contracts, recruitment and performance management activities. We have set explicit targets for compliance, commencing at executive management level. All employees are required to comply with our Code of Conduct and Ethics and report conduct that may be in breach of the law, the Code or ANZ policy.

To help our employees in applying the principles of our Code of Conduct and Ethics, we have developed a training course, called 'Living the Code' which forms part of our 'ANZ Essentials' risk accreditation framework. All ANZ Essentials course elements have been translated into Bahasa and Traditional Chinese and are available as CD-ROMs for remote areas or locations



with low bandwidth. Case studies are provided to assist employees in translating the Code and related policies into real-life situations.

### **Human Rights Standards**

ANZ's Group General Manager of Corporate Affairs has responsibility for our Human Rights standards. The position reports directly to the ANZ Group CEO. ANZ's Corporate Responsibility team is responsible for receiving and responding to all queries, concerns and other correspondence about human rights from external stakeholders, and can be contacted at:

Gerard Brown  
Group General Manager, Corporate Affairs  
ANZ  
10/833 Collins St  
Melbourne VIC 3000

If you would like to discuss this matter further, please contact me on (+613) 8654 4686 or email [ben.walker@anz.com](mailto:ben.walker@anz.com). Our 2014 Corporate Sustainability report will be released on 18 December at ANZ.com and I encourage you to include that material in your consideration of this response.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Ben Walker', written over a horizontal line.

**Ben Walker**  
Head of Sustainable Development

Cc: Bobbie Sta. Maria  
Phil Bloomer