



**ASIC**  
Australian Securities &  
Investments Commission

## CEU interim compliance report by ASIC

ASIC's interim report dated **21 May 2019** on compliance with the s93AA ASIC Act court enforceable undertaking (CEU) given by the **Australia and New Zealand Banking Group Limited (ANZ)** dated 15 March 2017.

Terms used in this report have the same meaning as in the CEU dated 15 March 2017.

Undertakings	Report on compliance
<b>Engagement of Independent Expert</b>  CEU paragraphs 4.2 and 4.3	1. ANZ agreed to the appointment by ASIC of PricewaterhouseCoopers ( <b>PwC</b> ) as the Independent Expert ( <b>IE</b> ) in accordance with the requirements specified in the CEU. ASIC appointed PwC as the IE on 29 November 2017.
<b>FX Program</b>  CEU paragraphs 4.7, 4.7.1 and 4.7.2	2. On 27 February 2018, ANZ submitted its FX Program to ASIC and the IE in accordance with the requirements and timeframe specified in the CEU.
<b>Assessment of FX Program</b>  CEU paragraph 4.8.1	3. The IE conducted an assessment of the effectiveness of ANZ's FX program to prevent, detect and respond to the matters outlined in the CEU, in accordance with the requirements and timeframe specified in the CEU.
<b>Expert Report</b>  CEU paragraph 4.8.2	4. On 28 May 2018, the IE submitted its Expert Report to ASIC and ANZ in accordance with the requirements and timeframe specified in the CEU.  5. The Expert Report set out the IE's findings from the assessment of the FX Program under paragraph 4.8.1. In summary, the IE: <ul style="list-style-type: none"><li>a. identified deficiencies in the FX Program; and</li><li>b. made recommendations, that in the opinion of the IE, would be necessary to rectify deficiencies identified in the Expert Report.</li></ul>

<b>Undertakings</b>	<b>Report on compliance</b>
<p data-bbox="215 257 454 291"><b>Final FX Program</b></p> <p data-bbox="215 324 454 358">CEU paragraph 4.9</p>	<p data-bbox="502 275 1284 409">6. On 27 August 2018, ANZ submitted its Final FX Program to ASIC and the IE in accordance with the requirements and timeframe specified in the CEU.</p>
<p data-bbox="215 515 422 577"><b>Further Expert Report</b></p> <p data-bbox="215 611 470 645">CEU paragraph 4.10</p>	<p data-bbox="502 533 1300 667">7. On 17 September 2018, the IE submitted its Further Expert Report to ASIC and ANZ in accordance with the requirements and timeframe specified in the CEU.</p> <p data-bbox="502 678 1316 869">8. The Further Expert Report set out the IE’s findings from the assessment of the Final FX Program including the IE’s opinion on whether the ANZ Final FX Program rectified deficiencies in the FX Program that were identified in the Expert Report.</p> <p data-bbox="502 880 1300 1115">9. ASIC noted that further information was required in order for ASIC and ANZ to reach an agreement as to the terms of the Final FX Program. Subsequently, ANZ agreed to provide additional information to the IE and ASIC by 30 November 2018.</p> <p data-bbox="502 1126 1316 1261">10. On 7 December 2018, the IE submitted its Addendum Report to the Further Expert Report in relation to the additional information.</p>
<p data-bbox="215 1321 470 1384"><b>Community Benefit Payment</b></p> <p data-bbox="215 1417 470 1451">CEU paragraph 4.17</p>	<p data-bbox="502 1339 1316 1473">11. On 15 March 2017, ANZ made payment to the total amount of A\$3 million to Financial Literacy Australia within the requirements and timeframe specified in the CEU.</p> <p data-bbox="502 1485 1316 1619">12. The payment will be used to support the financial capability of vulnerable people including women experiencing family violence, the elderly and youth at risk.</p>