



**ASIC**  
Australian Securities &  
Investments Commission

## CEU final compliance report by ASIC

ASIC's final report dated **06 February 2026** on compliance with the s93AA ASIC Act court enforceable undertaking (CEU) given by **Westpac Banking Corporation (Westpac)** 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| <b>Independent Expert</b><br><br>CEU paragraphs 3.2 and 3.3 | 1. Westpac agreed to the appointment by ASIC of Deloitte Touche Tohmatsu Limited ( <b>Deloitte</b> ) as the Independent Expert ( <b>IE</b> ) on the terms of engagement specified in the CEU. ASIC appointed Deloitte as the IE on 1 February 2018.                                                                                                                                                                                                                                                                                                                  |
| <b>FX Program</b><br><br>CEU paragraph 3.6                  | 2. On 2 April 2018, Westpac 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><br><br>CEU paragraph 3.7.1  | 3. The IE conducted its assessment of the effectiveness of Westpac's FX Program to prevent, detect and respond to conduct of concern outlined in the CEU, in accordance with the requirements and timeframe specified in the CEU.                                                                                                                                                                                                                                                                                                                                    |
| <b>Expert Report</b><br><br>CEU paragraph 3.7.3             | <div>4. On 6 July 2018, the IE submitted its Expert Report to ASIC and Westpac in accordance with the requirements and extended timeframe as agreed upon with ASIC.</div> <div>5. The Expert Report set out the IE's findings from the assessment of the FX Program under paragraph 3.7.1. In summary, the Expert Report:<div><div>a. identified deficiencies in the FX Program; and</div><div>b. made recommendations for actions, that in the opinion of the IE, would be necessary for Westpac to implement to rectify deficiencies identified.</div></div></div> |

| <b>Undertakings</b>                                   | <b>Report on compliance</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Final FX Program</b><br><br>CEU paragraph 3.8      | 6. On 6 August 2018, Westpac submitted its Final FX Program to ASIC and the IE in accordance with the requirements and timeframe specified in the CEU.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Further Expert Report</b><br><br>CEU paragraph 3.9 | 7. On 20 August 2018, the IE submitted its Further Expert Report to ASIC and Westpac in accordance with the requirements and extended timeframe as agreed upon with ASIC.<br><br>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 Westpac Final FX Program rectified deficiencies in the FX Program that were identified in the Expert Report.<br><br>9. The Further Expert Report also advised that the IE was unable to undertake a complete assessment of whether the proposed Final FX Program adequately addressed deficiencies that had been identified in the Expert Report, due to certain material inadequacies identified with respect to the Final FX Program. |
| <b>CEU Variation</b><br><br>2 October 2020            | 10. Consequently, Westpac and ASIC agreed to a variation. The variation was executed on 2 October 2020 (CEU Variation). The CEU Variation imposes additional undertakings on Westpac.<br><br>11. Westpac is to further develop its Final FX program which will then be subject to an effectiveness assessment by the IE in accordance with the provisions of the CEU Variation.                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>CEU Variation</b><br><br>Paragraph 3.9A(1)         | 12. On 8 December 2020, the IE requested further information in writing from Westpac which included further details of plans, designs or actions in respect of deficiencies and reasons in accordance with the requirements and timeframe specified in the CEU Variation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>CEU Variation</b><br><br>Paragraph 3.9B            | 13. On 1 March 2021, Westpac provided to ASIC and the IE the Requested Information in sufficient detail so as to permit the IE to provide a further report in accordance with the requirement and timeframe specified in the CEU Variation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| <b>Undertakings</b>                                                                   | <b>Report on compliance</b>                                                                                                                                                                                                                                                                                                  |
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| <b>CEU Variation</b><br><br>Paragraph 3.9C                                            | 14. On 4 May 2021, the IE submitted its Addendum to the Final Expert Report to ASIC and Westpac in accordance with the requirements as specified in the CEU variation and the extended timeframe as agreed upon with ASIC.                                                                                                   |
| <b>Agreed terms of Final FX Program</b><br><br>CEU Paragraph 3.10                     | 15. On 15 July 2022, ASIC and Westpac agreed the terms of the Final FX Program.                                                                                                                                                                                                                                              |
| <b>Implementation of Final FX Program</b><br><br>CEU Paragraph 3.11.2                 | 16. On 18 July 2022, Westpac implemented the Final FX Program in full and within the timeframes specified in the Final FX Program.                                                                                                                                                                                           |
| <b>Notification of Implementation of Final FX Program</b><br><br>CEU Paragraph 3.11.4 | 17. On 28 July 2022, Westpac notified ASIC and the IE that the Final FX Program has been fully implemented in accordance with the requirements and timeframe specified in the CEU.                                                                                                                                           |
| <b>Implementation Expert Report</b><br><br>CEU Paragraph 3.12                         | 18. On 31 January 2023, the IE submitted the Implementation Expert Report to Westpac and ASIC in accordance with the requirements and timeframe of the CEU.<br><br>19. The Implementation Expert Report set out the IE's findings on the outcome of the IE's assessment of Westpac's implementation of the Final FX Program. |
| <b>Internal Review Report</b><br><br>CEU Paragraph 3.13                               | 20. On 29 September 2023, 30 August 2024 and 5 September 2025, as agreed with ASIC in accordance with the requirements of the CEU, Westpac provided a copy of the Internal Review Report to ASIC and the IE, in accordance with the requirements and timeframe of the CEU.                                                   |

| Undertakings                                                 | Report on compliance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|                                                              | <p>21. The Internal Review Report documented the results of Westpac’s internal review of the current operation of the Final FX Program (including any material changes).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p><b>Annual Expert Report</b></p> <p>CEU Paragraph 3.14</p> | <p>22. On 20 December 2023, 29 November 2024 and 1 December 2025, as agreed with ASIC in accordance with the requirements of the CEU, the IE provided Annual Expert Reports to Westpac and ASIC, in accordance with the requirements and timeframe of the CEU.</p> <p>23. The Annual Expert Reports documented the outcome of the IE’s assessment of the effectiveness of the Final FX Program as then in operation (and including any material changes) to prevent, detect and respond to the matters set out in paragraphs 3.6.1 of the CEU.</p>                                                                                                                                                                                                                                                                                          |
| <p><b>Attestation</b></p> <p>CEU paragraph 3.15</p>          | <p>24. On 18 July 2022, 29 September 2023, 30 August 2024 and 5 September 2025, as agreed with ASIC in accordance with the requirements of the CEU, the senior executive of Westpac responsible for its global FX business, provided attestations to ASIC stating that:</p> <ul style="list-style-type: none"> <li>a. they had taken reasonable steps to satisfy themselves that Westpac’s systems and controls in its Spot FX business are appropriate and adequate to effectively prevent, detect and respond to the matters set out in paragraph 3.6.1; and</li> <li>b. nothing has come to their attention during the preceding twelve months to suggest that the Final FX Program (including any material changes) is not appropriate, to the extent reasonably possible to address the matters set out at paragraph 3.6.1.</li> </ul> |

| Undertakings                                                      | Report on compliance                                                                                                                                                                                                                                                                                                                                                        |
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| <p><b>Community Benefit Payment</b></p> <p>CEU paragraph 3.16</p> | <p>25. On 15 March 2017, Westpac made a community benefit payment of A\$3 million in total to Financial Literacy Australia within the requirements and timeframe specified in the CEU.</p> <p>26. The community benefit payment will support the financial capability of vulnerable people including women experiencing family violence, the elderly and youth at risk.</p> |
| <p><b>Costs</b></p> <p>CEU paragraph 3.18</p>                     | <p>27. Westpac paid the costs of the IE appointed by ASIC.</p>                                                                                                                                                                                                                                                                                                              |