

# ANZ Human Rights Grievance Mechanism Framework

June 2025

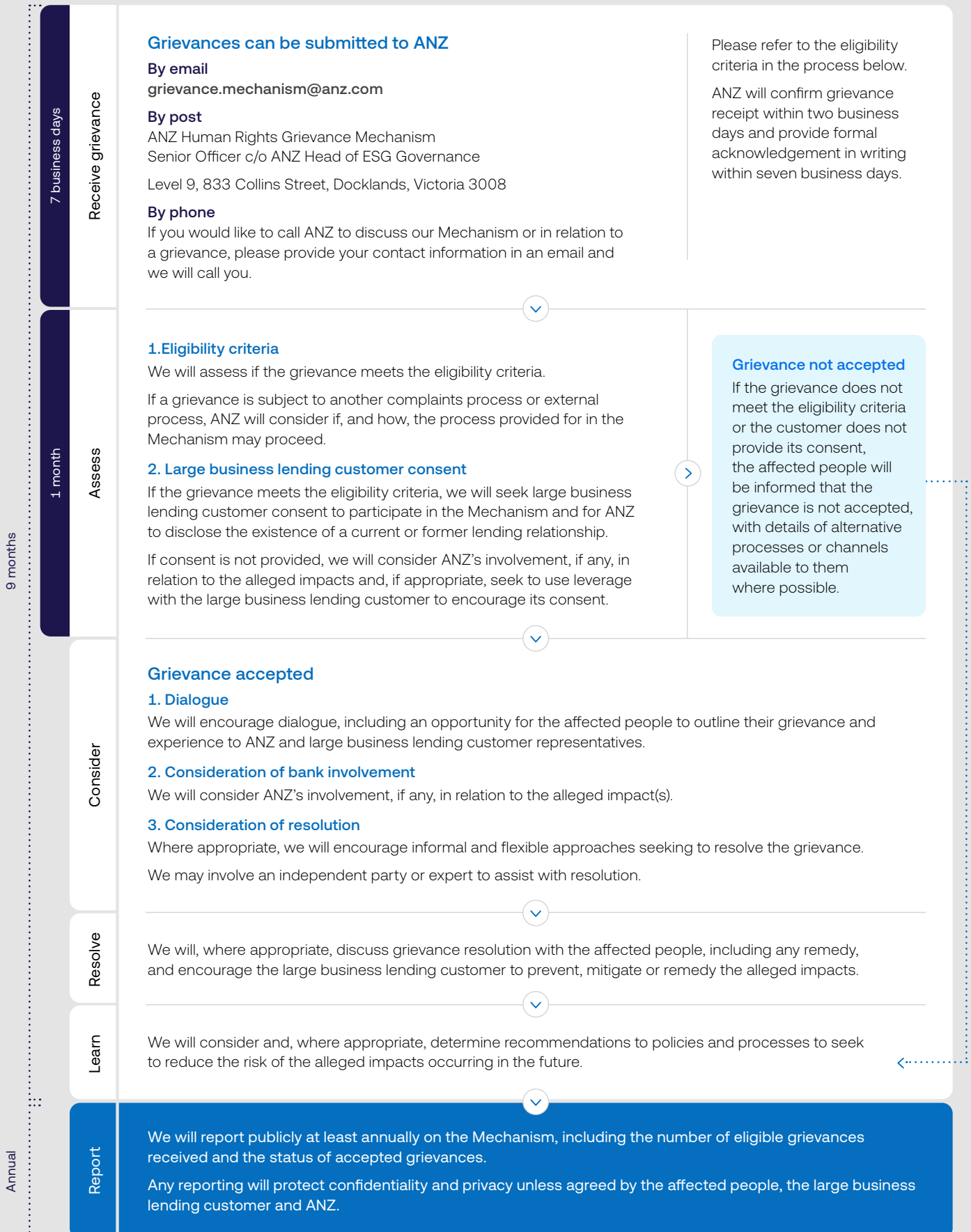
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# ANZ Human Rights Grievance Mechanism Flow Chart



# Introduction

ANZ recognises that it has an important role to play in supporting responsible business conduct by its large business lending customers.

In establishing this grievance mechanism (Mechanism), ANZ's aim is to provide a framework within which:

- people in any country who consider their human rights have been impacted by an ANZ large business lending customer (affected people) can raise their concerns with ANZ;
- efforts can be made to resolve grievances about alleged adverse human rights impacts associated with large business lending customers, including through dialogue; and
- feedback and recommendations can be provided to ANZ in relation to its policies and processes.

The outcomes of a grievance submitted under the Mechanism may be limited in some circumstances, including where

the large business lending customer does not provide consent to disclose its lending relationship with ANZ and/or to participate in the Mechanism process to resolve the grievance.

The Mechanism is designed to be informal and flexible. Depending on the circumstances, the sequencing and timing of steps in this process may vary. We will endeavour to communicate any variance to this process to the affected people and the large business lending customer. ANZ will strive to handle grievances through the Mechanism in a way that builds confidence in its effectiveness.

ANZ understands the need to actively promote the availability of the Mechanism. We will look to use grievances submitted to the Mechanism as an opportunity for learning and reflection on the Mechanism's scope and process.

## ANZ Human Rights Grievance Mechanism Process

### Principles

1. The Mechanism and, where relevant, ANZ's consideration of a remedy in response to a grievance, is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs),<sup>1</sup> the framework set out in the OECD Due Diligence for Responsible Corporate Lending and Securities Underwriting (2019)<sup>2</sup> and other relevant materials as they are released and considered by ANZ to be appropriate and applicable.

2. ANZ expects all large business lending customers to:

- 2.1. Respect human rights including providing for or cooperating with access to remedy where appropriate; and
- 2.2. Engage in good faith with the affected people through this Mechanism and/or other mechanisms.

Paragraphs 20 and 27 below outline how we may engage with large business lending customers that act inconsistently with our expectations.

### Our Human Rights Statement

further outlines what we expect of our large business customers, and specifies how we may engage with large business customers that act inconsistently with our expectations.

3. ANZ will protect confidentiality and privacy including in the materials and progress of each grievance submitted under this Mechanism unless otherwise agreed by the affected people, large business lending customer and ANZ.<sup>3</sup>

1. [https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr_en.pdf) 2. [https://www.oecd-ilibrary.org/finance-and-investment/due-diligence-for-responsible-corporate-lending-and-securities-underwriting\\_71fd2895-en](https://www.oecd-ilibrary.org/finance-and-investment/due-diligence-for-responsible-corporate-lending-and-securities-underwriting_71fd2895-en) 3. Unless disclosure is required by law.

4. ANZ does not tolerate retaliation against individuals or communities raising grievances and expects the same from large business lending customers.
5. The affected people may withdraw from the process at any time.
6. The affected people may submit grievances anonymously, however it may impact the ability of ANZ to progress the grievance or to undertake certain steps in the process.
7. Grievances are accepted in all languages.
8. Acceptance of a grievance into the Mechanism is an acknowledgment that the grievance meets the eligibility criteria noted in clause 15 and that ANZ and the large business lending customer agree to participate in the flexible process outlined in this framework.

Acceptance of a grievance into the Mechanism is not an agreement or admission by the large business lending customer or ANZ that:

- a. any of the allegations made in the grievance are valid or have merit, or
  - b. that affected people have authority to represent everyone in the community.
9. Throughout the grievance process, ANZ will strive to maintain ongoing communication with the affected people, the large business lending customer and relevant third parties.
  10. While ANZ will endeavour to deliver communications to the affected people and the large business lending customer in line with this framework, timeframes are indicative and may necessarily be extended in some circumstances (for example, where translation is required or a parallel process is on foot). ANZ will endeavour to keep the affected people and the large business lending customer updated when that happens.
  11. Grievances that relate to events some years ago may face practical challenges, such as access to relevant documentation and employees.

## Submitting a grievance

12. Grievances can be submitted to ANZ:

**12.1.** By email:  
**[grievance.mechanism@anz.com](mailto:grievance.mechanism@anz.com)**

**12.2.** By post:  
ANZ Human Rights Grievance  
Mechanism Senior Officer c/o  
ANZ Head of ESG Governance  
Level 9, 833 Collins Street,  
Docklands, Victoria 3008

If you would like to call ANZ to discuss our Mechanism or in relation to a grievance, please provide your contact information in an email and we will call you.

13. The affected people will receive confirmation of grievance submission within two business days of ANZ's receipt of the grievance.
14. The affected people will receive formal acknowledgment in writing with contact details of the ANZ Grievance Manager, an outline of the Mechanism's process and any request for additional information ANZ requires to consider the grievance within seven business days of ANZ's receipt of the grievance. ANZ will also endeavour to make contact via phone with the affected people where reasonably practicable.

## Assessing a grievance for acceptance into the Mechanism

15. For a grievance to be eligible for acceptance into the Mechanism, it must be:
  - 15.1.** Submitted by affected people;
  - 15.2.** About alleged human rights impacts<sup>4</sup> connected to a current or former ANZ large business lending customer; and
  - 15.3.** About large business lending customer activities that occurred during the period of ANZ's lending relationship with the customer, (together, eligibility criteria).

16. Grievances considered by ANZ to be vexatious will not be accepted to the Mechanism. ANZ will advise the affected people that the grievance has not been accepted.

17. The Mechanism is part of a wider complaints landscape that includes ANZ's complaints and escalation channels and other external processes such as a customer's own grievance mechanism or consultation process, the OECD National Contact Points and judicial processes.

If a grievance is subject to another complaints process or external process, ANZ will consider if, and how, the process provided for in the Mechanism may proceed. Steps ANZ can take in this circumstance include pausing the grievance process or not accepting the grievance into the Mechanism.

18. For a grievance to be accepted, the Mechanism also requires consent of the relevant large business lending customer to both:

- 18.1.** the disclosure of a current or former lending relationship (as applicable); and
- 18.2.** its participation in the Mechanism.

Following receipt of a grievance that meets the eligibility criteria, and subject to clauses 16 and 17, ANZ will contact the large business lending customer to seek these consents.

19. Obtaining consent from the large business lending customer is necessary as ANZ has legal confidentiality obligations to its customers. The effect of those obligations is likely to be that ANZ is restricted from disclosing certain information relating to the customer including details about financing arrangements the customer has or had with ANZ.
20. If the large business lending customer does not provide its consent, ANZ will, where appropriate, seek to use its leverage to encourage the large business lending customer to reconsider and provide its consent.

<sup>4</sup> Grievances about adverse impacts that are collective, diffuse and transboundary in nature such as climate change are outside the scope of this Mechanism.

21. In clause 20, the reference to 'leverage' is to a concept referred to in the UNGPs and is considered to exist if ANZ has the ability to influence the behaviour of others. ANZ may have no leverage where the grievance relates to a former ANZ customer.
22. In accordance with the OECD Due Diligence for Responsible Corporate Lending and Securities Underwriting (2019), the Senior Officer will also consider ANZ's connection, if any, to the alleged impacts and the appropriate action it will seek to take (see **Annexure 1**).
23. Unless ANZ notifies the affected people of the need for an extension, ANZ will inform the affected people within one month of ANZ's receipt of the grievance that the grievance has either:
  - 23.1. Been accepted into the Mechanism with a summary of next steps; or
  - 23.2. Not been accepted into the Mechanism. In this case, ANZ will seek to identify alternative processes or channels that may be available to the affected people (unless ANZ is restricted by confidentiality obligations) and take the actions outlined in clause 32.

## Considering a grievance accepted into the Mechanism

24. If a grievance is accepted:
  - 24.1. ANZ will encourage dialogue which, with regard to the preferences of the affected people, may include:
    - 24.1.1. An opportunity for the affected people to outline their grievance and experience and preferred outcome, remedy, or preference for next steps to ANZ and/or large business lending customer representatives; and
    - 24.1.2. Informal and flexible approaches seeking to resolve the grievance.
25. Unless otherwise communicated, ANZ will seek to update the affected people and the large business lending customer each month after receipt of a grievance.

## Resolving a grievance accepted into the Mechanism

26. ANZ will discuss resolving the grievance with the affected people, which may include discussions regarding an appropriate remedy.
27. ANZ will, acting reasonably, seek to use leverage to encourage the large business lending customer to prevent or mitigate the alleged impact, and where relevant, remedy the impact appropriate to the large business lending customer's own conduct and contribution.

28. Any remedy will be guided by the UNGPs and may include apologies, restitution, rehabilitation and financial or non-financial compensation, as well as the prevention of additional or further harm through, for example, guarantees of non-repetition.
29. ANZ's contribution to remedy, where relevant, will be guided by the framework in the UNGPs and OECD Due Diligence for Responsible Corporate Lending and Securities Underwriting (2019).
30. ANZ may involve an independent party or expert to assist with resolution, such as a mediator to facilitate further discussions or an expert to assist in determining remedy. Costs of the independent party or expert engaged by ANZ would not be the responsibility of the affected people.
31. The Mechanism will endeavour to resolve the grievance within nine months of ANZ's receipt of the grievance.

## Learn

32. The Senior Officer will consider and, where appropriate, recommend changes to policies and processes to seek to reduce the risk of the alleged impacts occurring in the future. This applies for all eligible grievances (as outlined in clause 15), regardless of whether the grievance is accepted into the Mechanism.

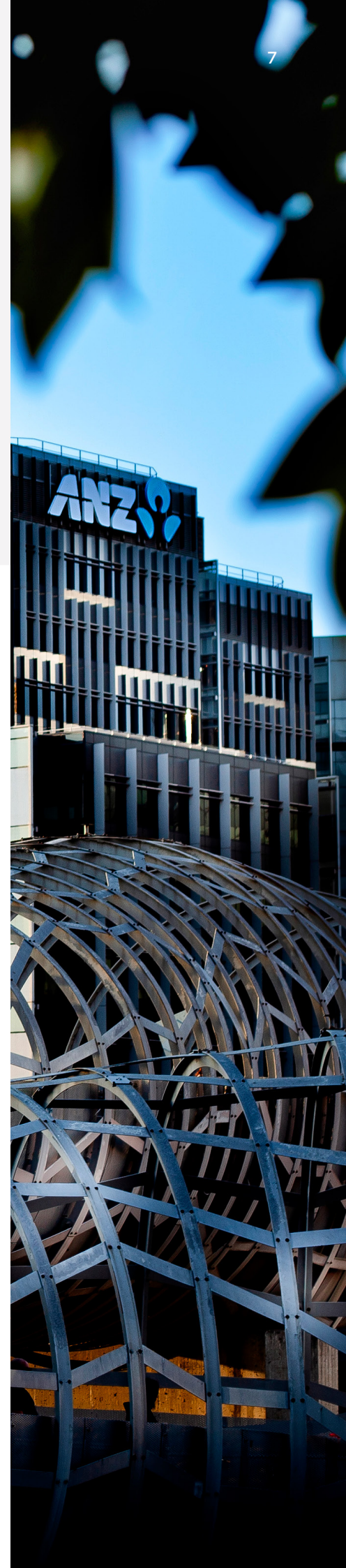


# Governance

33. The Mechanism is supported by the ANZ Senior Officer, Grievance Manager, and a cross-functional group of ANZ employees.
34. ANZ's Ethics and Responsible Business Committee is responsible for ongoing oversight of the Mechanism and receives updates on the progress of and outcomes from a grievance.
35. ANZ's Board Ethics, Environment, Social and Governance Committee endorses the Mechanism and receives quarterly updates.
36. The Mechanism is subject to periodic review and improvement, including review of the Mechanism's framework and operation every three years. This includes seeking external stakeholder input on the Mechanism's operation.

# External reporting

37. Public reporting will be at least annual and include, where possible:
  - 37.1. The number of eligible grievances received by the Mechanism; and
  - 37.2. Information about grievances accepted into the Mechanism, including:
    - 37.2.1. The number of grievances accepted to the Mechanism;
    - 37.2.2. The industry or sector in which the large business lending customer operates in association with each grievance;
    - 37.2.3. A general description of the alleged human right(s) impacts(s);
    - 37.2.4. The status of an accepted grievance; and
    - 37.2.5. A summary of outcomes.
38. In reporting, ANZ will seek to avoid potential risks to affected stakeholders and their nominated representatives, having regard to clauses 3 and 4 above.



## Annexure 1: Assessing bank connection

**ANZ's assessment of its connection to the alleged human rights impacts will be guided by the framework in the UNGPs and OECD Due Diligence for Responsible Corporate Lending and Securities Underwriting (2019).**

In accordance with the OECD Due Diligence for Responsible Corporate Lending and Securities Underwriting (2019) and UNGPs:

1. "Contribution" must be substantial, meaning it does not include minor or trivial contributions;
2. If ANZ has not made any contribution to an alleged impact, but the alleged impact is directly linked to ANZ's lending:
  - a. ANZ will not be responsible for providing remedy, and that responsibility will rest with the large business lending customer; and
  - b. ANZ will, where appropriate, seek to use leverage to encourage the large business lending customer to prevent or mitigate the alleged impact, and where relevant remedy the alleged impact appropriate to the large business lending customer's own conduct and contribution.

3. If ANZ accepts that it has made any contribution to an alleged impact:
  - a. ANZ will, acting reasonably, seek to use leverage to encourage the large business lending customer to prevent or mitigate the alleged impact, and where relevant, remedy the impact appropriate to the large business lending customer's own conduct and contribution; and
  - b. ANZ will provide for, or cooperate in, the remediation of the impact in a manner proportionate to its involvement and in a manner it considers appropriate in consultation with the affected people, which may include financial or non-financial remediation as appropriate.

## Annexure 2: Glossary

<b>Affected people</b>	The person or people (or their nominated representative) who believe their human rights have been directly impacted or are likely to be directly impacted and have submitted a grievance into the Mechanism.
<b>Large business lending customer</b>	Current or former lending customers of ANZ's Institutional division.
<b>Senior Officer</b>	The Senior Officer is an ANZ employee who is independent of the lending business and holds decision-making authority, including authority to agree on a resolution and recommend improvements to ANZ policy and processes.
<b>Vexatious</b>	A vexatious grievance is one which ANZ determines is frivolous, obviously untenable or manifestly groundless, or made to cause annoyance, detriment or achieve an ulterior purpose.



# Annexure 3: Frequently asked questions

## What grievances can the Mechanism accept?

The Mechanism can consider grievances if:

1. The grievance is submitted by affected people;
2. The grievance relates to alleged human rights impacts<sup>5</sup> connected to a current or former ANZ large business lending customer; and
3. The grievance relates to large business lending customer activities that occurred during ANZ's lending relationship with the customer.

Acceptance into the Mechanism also requires customer consent to the disclosure of the lending relationship and to participate in the process.

Grievances considered by ANZ to be vexatious will not be accepted into the Mechanism.

ANZ will consider if and how the Mechanism's process may proceed if a grievance is subject to another complaints process or external process.

For more detail on grievance acceptance please consider the framework above.

## What happens when a large business lending customer does not provide its consent?

If the large business lending customer does not provide its consent to disclose its lending relationship with ANZ and to participate in the Mechanism, ANZ may, where appropriate:

- Consider its own connection, if any, in relation to the alleged impacts.
- Seek to use leverage to encourage the large business lending customer to consent to disclose its lending relationship with ANZ and to participate in the Mechanism.
- Seek to otherwise encourage the large business lending customer to prevent or mitigate the alleged impacts.
- Consider changes to policies and processes to seek to reduce the risk of the alleged impacts occurring in the future.

## What outcomes are possible through the grievance mechanism?

Depending on the circumstances, the Mechanism may help to deliver the following outcomes:

- Promote dialogue between the affected people, the large business lending customer and ANZ.
- Consider alleged human rights impacts and whether ANZ is connected.
- Consider any ANZ contribution to remedy as may be appropriate.
- Use leverage to encourage the large business lending customer to meet their responsibility under the UNGPs to prevent or mitigate adverse human rights impacts.
- Consider recommendations in relation to ANZ's policies and processes to reduce the risk of any impacts happening again.

The outcomes of a grievance submitted under the Mechanism may be limited in some circumstances, including where the large business lending customer does not provide consent to disclose its lending relationship with ANZ and to participate in the Mechanism.

## What does "participation" mean?

After a grievance is accepted, ANZ will encourage dialogue including:

- An opportunity for affected people to outline their grievance and experience to ANZ and large business lending customer representatives; and
- Informal and flexible approaches seeking to resolve the grievance including exchange of information.

## How is confidentiality/disclosure of information dealt with in the Mechanism?

ANZ will protect confidentiality and privacy including in the materials and progress of each grievance, unless otherwise agreed by each of the affected people, the large business lending customer and ANZ, or unless disclosure is required by law.

## How are grievances submitted to the Mechanism?

Grievances can be submitted by completing an ANZ grievance submission form and sending it to ANZ in one of the following ways:

**By email**  
[grievance.mechanism@anz.com](mailto:grievance.mechanism@anz.com)

**By post**  
 ANZ Human Rights Grievance Mechanism Senior Officer c/o  
 ANZ Head of ESG Governance  
 Level 9, 833 Collins Street  
 Docklands, Victoria 3008

If you would like to call ANZ to discuss our Mechanism or in relation to a grievance, please provide your contact information in an email and we will call you.



**ANZ GM grievance submission form 2025 (Doc 48kB)**

<sup>5</sup>. Grievances about adverse impacts that are collective, diffuse and transboundary in nature such as climate change are currently broader than the scope of this Mechanism.

