

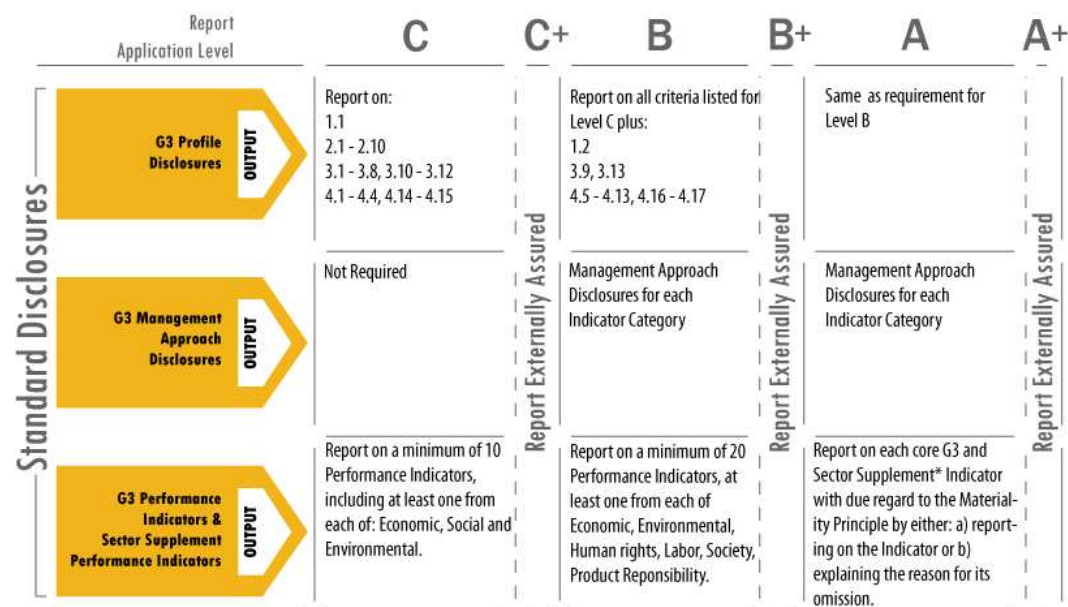
National Australia Bank GRI Index 2011



National Australia Bank GRI Index 2011

This Index provides a map to subjects and data provided throughout our 2011 Integrated Annual Review, as well as to the Global Reporting Initiative (GRI) indicators on which we have reported. The listing of GRI indicators is part of the requirements we must meet to produce GRI-based reporting requirements. For our 2011 Integrated Annual Review we have used Version 3.0 of the GRI's Sustainability Reporting Guidelines (G3). A full description of these requirements is available at: www.globalreporting.org. To achieve a reporting application level of A+ we are required to report on all core G3 and the relevant sector supplement indicators and provide an "if not, why not" response to any core indicator on which we have not reported on. Along side the Index we have included an explanation of the reasons we have not reported on omitted indicators. Where appropriate the index refers the reader to appropriate sources of the required information, including our 2011 Integrated Annual Review, 2011 Annual Financial Report, Dig Deeper supplements and online content.

Key	
2011 Annual Financial Report	AFR
2011 Annual Review	AR
2011 Dig Deeper Customer Supplement	DDC
2011 Dig Deeper Community Supplement	DDCM
2011 Dig Deeper Environment Supplement	DDE
2011 Dig Deeper People Supplement	DDP
2011 Dig Deeper Supply Chain Supplement	DDSC
www.nabgroup.com	WEB



*Sector supplement in final version

GRI Application Level

The GRI's Sustainability Guidelines specify classification system for degree of application of the guidelines to reporting. Reports intended to qualify for level C, C+, B, B+, A or A+ must contain each of the criteria that are presented in column for the relevant level in the diagram illustrated below. 2011 Integrated Annual Review (designated web information, our 2011 Integrated Annual Review and online reporting, and this GRI Index) were prepared to meet the requirements of application level A+. 2011 Integrated Annual Review has been checked by GRI and has been confirmed as A+.





Statement GRI Application Level Check

GRI hereby states that **National Australia Bank** has presented its report "National Australia Bank 2011 Annual Review" to GRI's Report Services which have concluded that the report fulfills the requirement of Application Level A+.

GRI Application Levels communicate the extent to which the content of the G3 Guidelines has been used in the submitted sustainability reporting. The Check confirms that the required set and number of disclosures for that Application Level have been addressed in the reporting and that the GRI Content Index demonstrates a valid representation of the required disclosures, as described in the GRI G3 Guidelines.

Application Levels do not provide an opinion on the sustainability performance of the reporter nor the quality of the information in the report.

Amsterdam, 17 November 2011

A handwritten signature in blue ink, appearing to read "Nelmara Arbex", is written over a large, faint watermark of the GRI logo.

Nelmara Arbex
Deputy Chief Executive
Global Reporting Initiative



The "+" has been added to this Application Level because **National Australia Bank** has submitted (part of) this report for external assurance. GRI accepts the reporter's own criteria for choosing the relevant assurance provider.

The Global Reporting Initiative (GRI) is a network-based organization that has pioneered the development of the world's most widely used sustainability reporting framework and is committed to its continuous improvement and application worldwide. The GRI Guidelines set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance.
www.globalreporting.org

Disclaimer: Where the relevant sustainability reporting includes external links, including to audio visual material, this statement only concerns material submitted to GRI at the time of the Check on 11 November 2011. GRI explicitly excludes the statement being applied to any later changes to such material.

STANDARD DISCLOSURES PART I: Profile Disclosures

1. Strategy and Analysis

Profile Disclosure	Description	Reported	Cross-reference/Direct answer	Reason for omission
1.1	Statement from the most senior decision-maker of the organisation.	Fully	AR: Chairman's Message (2), Group CEO (3-4) WEB: Chairman's Message, Group CEO (http://www.nabgroup.com/2011AnnualReport)	
1.2	Description of key impacts, risks, and opportunities.	Fully	AR: Chairman's Message (2), Group CEO (3-4), Our Business (8-9), Our Strategy (10-13), Our Performance (14-31), WEB: (http://www.nabgroup.com/2011AnnualReport) Further Information: Please also refer 'Dig Deeper' supplements for detailed analysis. The material areas of risk and opportunity identified from a CR standpoint include: <ul style="list-style-type: none"> - Customer service - Community investment - Responsible finance - Organisational culture - Fees & charges - Ethics & business conduct - Responsible lending - Disaster relief - Transparency - Assisting those experiencing hardship - Talent management - Security, fraud and AML - Access to financial services - Diversity & inclusion 	

2. organisational Profile

Profile Disclosure	Description	Reported	Cross-reference/Direct answer	Reason for omission
2.1	Name of the organisation.	Fully	AR: Our Business (6) AFR: Inside Front Cover WEB: http://www.nabgroup.com.au/0,,32714,00.html	
2.2	Primary brands, products, and/or services.	Fully	AR: Our Business (6), Our Performance (14-23) WEB: http://www.nabgroup.com.au/0,,32837,00.html	
2.3	Operational structure of the organisation, including main divisions, operating companies, subsidiaries, and joint ventures.	Fully	AR: Our Business (2-6), Further Information (32-33) WEB: http://www.nabgroup.com.au/0,,32837,00.html	
2.4	Location of organisation's headquarters.	Fully	AFR: Principal Establishments (inside Back Cover)	

2.5	Number of countries where the organisation operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	Fully	AR: Our Business (6) WEB: http://www.nabgroup.com.au/0,,32837,00.html	
2.6	Nature of ownership and legal form.	Fully	National Australia Bank (NAB) is publicly listed in Australia and overseas.	
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	Fully	AR: Our Performance (14-23) WEB: http://www.nabgroup.com.au/0,,32837,00.html	
2.8	Scale of the reporting organisation.	Fully	AR: 2011 Results (1), People (26-27), Performance Summary (34-35), Our Performance (14-23) WEB: http://www.nabgroup.com.au/0,,32714,00.html	
2.9	Significant changes during the reporting period regarding size, structure, or ownership.	Fully	AFR: Report of the Directors (7)	
2.10	Awards received in the reporting period.	Fully	AR: Our Performance (14-31) WEB: http://www.nabgroup.com/0,,102156,00.html	

3. Report Parameters

Profile Disclosure	Description	Reported	Cross-reference/Direct answer	Reason for omission
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	Fully	AR: About This Report (Inside Cover) WEB: http://www.nabgroup.com/2011AnnualReport	
3.2	Date of most recent previous report (if any).	Fully	2010 Annual Review published in October 2010.	
3.3	Reporting cycle (annual, biennial, etc.)	Fully	Our Corporate Responsibility reporting is performed annually.	
3.4	Contact point for questions regarding the report or its contents.	Fully	AR: Contact Details (37)	
3.5	Process for defining report content.	Fully	WEB: Our Approach to Corporate Responsibility (http://www.nabgroup.com/cr) Stakeholder engagement included meetings with investors and analysts, feedback sessions with business partners and community partners, meetings with internal relationship managers, & feedback survey to stakeholders. (http://www.nabgroup.com/0,,102160,00.html)	
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.	Fully	AR: Our Business (6) DDC, DDCM, DDP, DDSC: (1) DDE: (intro page) The above reports outline our performance in the four key geographies in which the majority of our operations are located - Australia, New Zealand, the United Kingdom and the United States, unless otherwise stated. The Group has operations in Asia, however, they are not generally included in scope due to their limited scope. References to 'NAB' are to National Australia Bank Limited ABN 12 004 044 937. The 'Group' refers to NAB and its controlled entities across the above regions.	
3.7	State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope).	Fully	AR: About This Report (Inside Cover)	

3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organisations.	Fully	AR: About This Report (Inside Cover)	
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.	Fully	Data measurement techniques are based on the indicator protocols unless methodologies are otherwise stated. Methodologies and assumptions are identified where appropriate in footnotes or the body of the text where the data resides.	
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	Fully	Re-statements are footnoted in the Annual Review and Dig Deeper, none of which were material.	
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	Fully	AFR: Report of the Directors (7-8)	
3.12	Table identifying the location of the Standard Disclosures in the report.	Fully	This document.	
3.13	Policy and current practice with regard to seeking external assurance for the report.	Fully	AR: Assurance (36) DDE: Assurance Statement (18 - 19)	

4. Governance, Commitments, and Engagement

Profile Disclosure	Description	Reported	Cross-reference/Direct answer	Reason for omission
4.1	Governance structure of the organisation, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organisational oversight.	Fully	AFR: Corporate Governance (44) AR: Governance (8)	
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	Fully	AFR: Corporate Governance (44) AR: Governance (8)	
4.3	For organisations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.	Fully	AFR: Corporate Governance (44)	
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	Fully	AFR: Corporate Governance (44) AR: Governance (8)	
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organisation's performance (including social and environmental performance).	Fully	AFR: Corporate Governance (44), Report of the Directors (2)	

4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	Fully	AFR: Corporate Governance (45) AR: Governance (8)	
4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental, and social topics.	Fully	AFR: Corporate Governance (44), Report of the Directors (2)	
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	Fully	AFR: Corporate Governance (50-52) WEB: http://www.nabgroup.com/0,,102161,00.html	
4.9	Procedures of the highest governance body for overseeing the organisation's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	Fully	AFR: Report of the Directors (7) AR: Governance (8-9) WEB: http://www.nabgroup.com/0,,102161,00.html	
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	Fully	AFR: Corporate Governance (44) AR: Governance (8)	
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organisation.	Fully	NAB does not explicitly reference the precautionary approach in its risk management framework. However, in day-to-day operations we employ sound risk management practices which are described on our Group website at www.nabgroup.com . We do not face material environmental challenges in terms of the direct environmental impacts of our operations. However, where environmental challenges are viewed as material and they are likely to impact on our operations or our credit risk processes, we undertake a risk assessment and may modify our processes and procedures to account for these risks.	
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organisation subscribes or endorses.	Fully	DDC: Equator Principles (9) DDE: Dig Deeper Environment (Back cover) WEB: http://www.nabgroup.com/0,,91282,0.html and http://www.nabgroup.com/0,,102166,00.html	
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organisations in which the organisation: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.	Fully	WEB: http://www.nabgroup.com/0,,102166,00.html WEB: http://www.nabgroup.com/0,,102163,00.html	
4.14	List of stakeholder groups engaged by the organisation.	Fully	WEB: http://www.nabgroup.com/0,,102160,00.html	

4.15	Basis for identification and selection of stakeholders with whom to engage.	Fully	<p>WEB: Our Approach to Corporate Responsibility (http://www.nabgroup.com/cr)</p> <p>WEB: http://www.nabgroup.com/0,,102160,00.html</p> <p>We are guided in our stakeholder engagement by the AA1000 Stakeholder Engagement Standard. This process included stakeholder mapping of key stakeholder groups based on an assessment of their level of interest and influence. Outcomes of this assessment fed directly into our materiality assessment (issues identified by stakeholder groups assessed high priority on stakeholder maps were given higher scores in our assessment of material issues).</p>	
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	Fully	<p>WEB: http://www.nabgroup.com/0,,102160,00.html</p> <p>A number of engagements identified on this page are undertaken annually specifically for the report preparation process. Engagement for this purpose includes investor interviews, stakeholder lunches, employee engagement sessions, internal stakeholder workshop and media search. In addition we carry out on-going stakeholder engagement throughout the year.</p> <p>WEB: Our Approach to Corporate Responsibility (http://www.nabgroup.com/cr)</p>	
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organisation has responded to those key topics and concerns, including through its reporting.	Fully	<p>DDC: Customer Issues (1)</p> <p>DDCM: Community (1)</p> <p>DDE: Environmental Issues (intro page)</p> <p>DDP: People Issues (1)</p> <p>DDSC: Supply Chain Issues (1)</p> <p>AR: Achievements and Challenges (25)</p> <p>WEB: http://www.nabgroup.com/0,,102159,00.html</p>	

STANDARD DISCLOSURES PART II: Disclosures on Management Approach (DMAs)

G3 DMA	Description	Reported	Cross-reference/Direct answer	Reason for omission
DMA PS	Disclosure on Management Approach PS			
Aspects	Product Portfolio			
FS1	Policies with specific environmental and social components applied to business lines.	Fully	<p>AR: Community (28-29), Environment (30-31), Supply Chain (31)</p> <p>DDCM: Dig Deeper Community</p> <p>DDE: Dig Deeper Environment</p> <p>DDSC: Dig Deeper Supply Chain</p> <p>WEB: http://www.nabgroup.com/0,,91282,00.html</p>	
FS2	Procedures for assessing and screening environmental and social risks in business lines.	Fully	<p>DDE: Dig Deeper Environment (7)</p> <p>DDC: Dig Deeper Customer</p> <p>AR: Responsible Lending (25)</p> <p>WEB: http://www.nabgroup.com/0,,91282,00.html</p>	
FS3	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions.	Fully	<p>WEB: http://www.nabgroup.com/0,,91282,00.html</p>	

FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines.	Fully	Included ESG Risk as part of our internal CC&E Conference with 100 employees. Developed ESG modules for inclusion in Risk Awareness Training to roll out in October 2011. A number of employees completed the UNEPFI ESRA Training in June 2011.	
FS5	Interactions with clients/investees/business partners regarding environmental and social risks and opportunities.	Fully	AR: Our Business (6-7, 10-13) DDE: Dig Deeper Environment DDSC: Dig Deeper Supply Chain WEB: http://www.nabgroup.com/0,,91282,00.html	
	Audits	Fully	We have had CN, NGER and CRC audits in 2011. Plus EEO desktop audit conducted by DRET.	
DMA EC	Disclosure on Management Approach EC			
Aspects	Economic Performance COMM	Fully	AFR: Annual Financial Review AR: Annual Review DDE: Dig Deeper Environment (6-7) DDCM: Dig Deeper Community	
	Market presence	Fully	AR: Annual Review DDSC: Dig Deeper Supply Chain	
	Indirect economic impacts	Fully	This document. DDCM: Dig Deeper Community	
DMA EN	Disclosure on Management Approach EN			
Aspects	Materials	Fully	DDE: Dig Deeper Environment	
	Energy	Fully	DDE: Dig Deeper Environment	
	Water	Fully	DDE: Dig Deeper Environment	
	Biodiversity	Fully	DDE: Dig Deeper Environment (7) NAB's operations are all located in urban built environments and therefore have no direct impacts on biodiversity rich habitats.	
	Emissions, effluents and waste	Fully	DDE: Dig Deeper Environment	
	Products and services	Fully	DDE: Dig Deeper Environment (6) AR: Environment (30-31) WEB: http://www.nabgroup.com/0,,49055,0.html Financial products and services do not have any material direct environmental impacts. There is however an indirect impact through the activities of customers to whom we lend. Our stakeholders have told us that this indirect impact is of concern to them. NAB Group's adoption of the Equator Principles is one way we are reducing the potential environmental and social impact of our lending. Our environmental credit risk policies also help address the potential indirect environmental impacts of our lending.	
	Compliance	Fully	DDE: Dig Deeper Environment (3) During 2011 NAB Group did not incur any fines, penalties, or non-monetary sanctions for non-compliance with any environmental laws and regulations.	

	Transport	Fully	DDE: Note 6 Transport and Travel (15)	
	Overall	Fully	WEB: Group Environment Policy (http://www.nabgroup.com/0,,48935,00.html)	
DMA LA	Disclosure on Management Approach LA			
Aspects	Employment	Fully	DDP: Workforce (2), Employee Turnover (3) WEB: http://www.nabgroup.com/0,,48934,00.html AR: People (26-27)	
	Labour/management relations	Fully	DDP: Collective Bargaining (6) WEB: http://www.nabgroup.com/0,,91288,0.html#Diversity_and_inclusion and http://www.nabgroup.com/0,,48934,00.html NAB has a policy in place with respect to significant organisational change. In each business as part of our collective agreements, there are commitments to consult employees regarding significant organisational change prior to the implementation of that change.	
	Occupational health and safety COMM	Fully	DDP: Health and Wellbeing (5) WEB: Health and Wellbeing (http://www.nabgroup.com/0,,91288,0.html#Health_Safety_and_Wellbeing)	
	Training and education	Fully	AR: People (26-27) DDP: Building capability (6), Dig Deeper People WEB: Learning and Development (http://www.nabgroup.com/0,,91288,0.html#Learning_and_Development)	
	Diversity and equal opportunity	Fully	DDP: Diversity (4) WEB: Diversity and Inclusion (http://www.nabgroup.com/0,,91288,0.html#Diversity_and_inclusion) WEB: Corporate Governance Statement (http://www.nabgroup.com/0,,33874,00.html)	
DMA HR	Disclosure on Management Approach HR			
Aspects	Investment and procurement practices	Fully	DDSC: Dig Deeper Supply Chain (2) WEB: Supply Chain (http://www.nabgroup.com/0,,91277,00.html)	
	Non-discrimination	Fully	AR: Supply Chain (Page 31) Future Focus DDP: Collective Bargaining (6)	
	Freedom of association and collective bargaining	Fully	DDP: Collective Bargaining (6) WEB: Industrial Relations (http://www.nabgroup.com/0,,91288,00.html)	
	Child labour	Fully	NAB employs an adult professional workforce in all countries in which it operates.	
	Forced and compulsory labour	Fully	NAB employs an adult professional workforce in all countries in which it operates.	
	Security practices	Fully	WEB: Corporate Governance (http://www.nabgroup.com/0,,33874,00.html)	

	Indigenous rights	Fully	WEB: Indigenous Reconciliation Action Plan (RAP) (http://www.nab.com.au/wps/wcm/connect/nab/nab/home/About_Us/7/4/2/7/4/?ncID=ZBA)	
DMA SO	Disclosure on Management Approach SO			
Aspects	Community	Fully	AR: Customer (24-25), Community (28-29), DDC: Rural Coverage in Australia (2), Microfinance (8) DDCM: Dig Deeper Community (2)	
	Corruption	Fully	AFR: Governance (44) WEB: Code of Conduct (http://www.nabgroup.com/0,,102141,0.html)	
	Public policy	Fully	AR: Our Responsibility (6) WEB: Code of Conduct (http://www.nabgroup.com/0,,102141,0.html)	
	Anti-competitive behaviour	Fully	Anti-competitive behaviour training forms part of our compliance training related to our Code of Conduct. All employees must complete this training. The Code of Conduct outlines National Australia Bank's behavioural guidelines.	
	Compliance	Fully	AFR: Report of the Directors (8) WEB: Code of Conduct (http://www.nabgroup.com/0,,102141,0.html)	
DMA PR	Disclosure on Management Approach PR			
Aspects	Customer health and safety	Fully	This indicator is not relevant to the types of products and services provided by our business. However, we do provide 'health warnings' on our credit card-related direct mail and in branch brochures to help customers to manage their levels of debt.	Not applicable
	Product and service labelling	Fully	AR: Community (28-29) WEB: http://www.nabgroup.com/0,,102142,0.html WEB: Product Disclosure Statement (http://www.nab.com.au/wps/wcm/connect/nab/nab/home/business_solutions/15/4/8/?WT.seg_1=SEBBB&WT.ac=SEBBB)	
FS15	Policies for the fair design and sale of financial products and services.	Fully	AR: Customer (24-25) WEB: http://www.nabgroup.com/0,,102141,00.html	
	Marketing communications	Fully	Compliance training includes a module on trade practices compliance to ensure employees, particularly those in marketing and communications, understand their obligations to provide appropriate information for customers. We also have engaged in a program to simplify our customer communication. We include the appropriate and required product disclosure statements and general advice warnings on our products and services. WEB: Group Disclosure & External Communications Policy (http://www.nabgroup.com/0,,33874,00.html)	
	Customer privacy	Fully	WEB: NAB's Privacy Policy (http://www.nabgroup.com/0,,34633,00.html)	

	Compliance	Fully	DDC: Customer Complaints (7) WEB: Code of Conduct (http://www.nabgroup.com/0,,102141,0.html) Compliance training includes a module on trade practices compliance to ensure employees understand their obligations to provide appropriate information for customers.	
--	------------	-------	--	--

STANDARD DISCLOSURES PART III: Performance Indicators

Product and Service Impact

Performance Indicator	Description	Reported	Cross-reference/Direct answer	Reason for Omission
Product portfolio				
FS6	Percentage of the portfolio for business lines by specific region, size (e.g. micro/SME/large) and by sector.	Fully	DDC: Business Footings (3)	
FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose.	Fully	DDC: Microfinance (8) WEB: http://www.nabgroup.com/0,,102155,0.html	
FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose.	Fully	DDE: Dig Deeper Environment (6) DDC: Responsible Lending (8) NAB provides project finance for renewable energy infrastructure development. We have reported the sector breakdown for our project finance portfolio, along with the percentage of our Group's total loans and advances, including loans at fair value represented by our project finance portfolio in our Customer Dig Deeper.	
Audit				
FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures.	Fully	WEB: http://www.nabgroup.com/0,,91280,0.html	
Active ownership				
FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organisation has interacted on environmental or social issues.	Not	We mostly take a 'manager of managers' approach to the provision of investment products, therefore we do not have direct access to the companies in which we invest. Our Environmental Finance, Project Finance and Agri Banking teams have regular conversations with clients on sustainability risks and opportunities. We do not however have systems to collect quantitative data to allow us to fully report on this indicator.	Not applicable
FS11	Percentage of assets subject to positive and negative environmental or social screening.	Fully	DDC: Responsible Investment (10) WEB: http://www.nabgroup.com/cr We offer a range of socially responsible investment (SRI) investment options. These investments are screened by the fund managers on social and environmental criteria. We make these investment options available through MLC's various investment platforms. Our SRI fund portfolio is shown online and it represents 0.30% of our total funds under management and administration.	

FS12	Voting polic(ies) applied to environmental or social issues for shares over which the reporting organisation holds the right to vote shares or advises on voting.	Fully	<p>NAB, through MLC, our Australian wealth management business, mostly has a 'Manager of Managers' approach to the provision of investment products. The outcome of this approach is an efficiently implemented portfolio, which is diversified across asset classes, within asset classes and across investment managers. This approach is based on a number of fundamental investment beliefs, one of which is that diversification leads to more consistent outcomes. For International holdings through "Manager of Managers" investments, responsibility for proxy voting is delegated to the underlying fund managers.</p> <p>MLC's proxy voting policy for other Funds Under Management (FUM) is to access and vote all proxies for every resolution in respect of holdings beneficially owned by MLC entities in companies publicly listed in Australia (unless MLC has no discretion to vote). Where practicable, MLC votes on all proxies for every resolution in respect to Superannuation holdings beneficially owned by members of the products. MLC exercises proxy voting rights for domestic FUM and votes on resolutions as declared on mlc.com.au.</p>	
------	---	-------	--	--

Economic

Performance Indicator	Description	Reported	Cross-reference/Direct answer	Reason for Omission
Economic performance				
EC1 ^{COMM}	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	Fully	AFR: Financial Report 2011 (55-160) DDCM: Dig Deeper Community	
EC2	Financial implications and other risks and opportunities for the organisation's activities due to climate change.	Fully	Refer to our 2011 CDP submission – WEB: (https://www.cdproject.net/en-US/Results/Pages/overview.aspx)	
EC3	Coverage of the organisation's defined benefit plan obligations.	Fully	AFR: 2011 Note 32 (105)	
EC4	Significant financial assistance received from government.	Not	This is described in the GRI G3 Sustainability Reporting Guidelines as significant financial assistance received from a government in comparison with taxes paid as a measure of the host governments contributions' to the reporting organisation. Having regard to the nature of the Group's businesses and having made limited internal inquiries, we do not believe that the Group is a significant or material recipient of subsidies other than deductions allowed by tax legislation for all relevant or qualifying tax payers. Therefore, on the basis of materiality we have not reported this information.	Not material

Market presence				
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	Fully	<p>DDSC: Responsible Procurement (2)</p> <p>AR: Supply Chain (31)</p> <p>We do not have a specific policy, we state that we generally use local suppliers unless the relevant goods or service provision is negotiated as part of a master contract negotiated for the Group. Suppliers are selected on the basis of a range of commercial requirements including CR criteria. We piloted a Social Procurement Panel in March 2011 and we working to further develop the panel.</p>	
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	Fully	<p>NAB does not have a specific policy regarding local hiring, as our significant operations are based in major capital cities of OECD countries. However, we hire employees based on merit and appropriateness of their skill set for any advertised position. The majority of our employees are hired from within the region that each of our businesses operate.</p> <p>WEB: We have an Indigenous Employment Program aimed at providing training opportunities for Indigenous Australians. (http://www.nab.com.au/wps/wcm/connect/nab/nab/home/About_Us/7/4/2/7/4/?ncID=ZBA)</p>	
Indirect economic impacts				
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	Partially	<p>Our business mainly operates in built up areas in cities and towns, therefore this indicator is not of direct relevance to our operations. We do not directly undertake infrastructure developments of the nature described by this indicator. We do provide in-kind support to not-for-profit organisations and NGOs from time to time in the form of access to our buildings and pro bono skilled volunteering.</p>	Not material
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	Fully	<p>The Group is a major provider of financial services across Australia, New Zealand, the United Kingdom and in global markets. As such, we play a significant role in the management of economic, social and environmental wealth that underlies the welfare of the community and its wide range of stakeholders. This includes:</p> <ul style="list-style-type: none"> - clearing and settling of payments in order to facilitate the exchange of goods and services - managing the savings of households and businesses - providing credit to assist the transfer of resources through time across regions, industries, governments, businesses and households - managing uncertainty and risk to help maintain confidence in the financial system and the community. 	

Environmental				
Performance Indicator	Description	Reported	Cross-reference/Direct answer	Reason for Omission
Materials				
EN1	Materials used by weight or volume.	Fully	DDE: Note 4 GHG Emissions (13) As a service based organisation, paper is the only material identified as material for reporting purposes.	
EN2	Percentage of materials used that are recycled input materials.	Fully	DDE: Note 5 Waste to landfill and recycle (14)	
Energy				
EN3	Direct energy consumption by primary energy source.	Fully	<p>DDE: Note 2 Energy consumption and production (11) provides total direct energy consumption. Breakdown by source as follows:</p> <div style="border: 1px solid black; padding: 5px;"> <p>Energy Consumption (GJ) by source</p> <p>Direct Energy Consumption (group)</p> <p>Stationary Energy (Diesel) - 2,199</p> <p>Stationary Energy (Gas) - 265,062</p> <p>Stationary Energy (Propane) - 865</p> <p>Business Travel (Car fleet - Diesel) - 9,218</p> <p>Business Travel (Car fleet - Petrol) - 110,811</p> <p>Business Travel (Car fleet - LPG) - 21</p> <p>Business Travel (Car fleet - Ethanol) - 786</p> <p>Business Travel (Car fleet Oil & Grease) - 229</p> <p>Indirect Energy Consumption</p> <p>Stationary Energy (Electricity) - 755,687</p> </div>	
EN4	Indirect energy consumption by primary source.	Fully	<p>DDE: Note 2 Energy consumption and production (11) provides net indirect energy consumption. This is wholly comprised of Stationary Energy (Electricity) - 1,144,876 GJ</p> <p>DDE: Note 2 Energy consumption and production (11) NAB purchased 57,312 GJ of GreenPower™ in Australia.</p> <p>Energy produced (through burning gas for electricity generation) at NAB's tri-generation facility at our main data centre during 2010/11 was 48,511 GJ.</p>	
EN5	Energy saved due to conservation and efficiency improvements.	Fully	DDE: Carbon Neutral and Beyond (4-5) WEB: (http://www.nabgroup.com/0,,102147,0.html)	
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	Fully	DDE: Products and services (6)	

EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	Fully	DDE: Carbon Neutral and Beyond (4-5) WEB: (http://www.nabgroup.com/0,,102147,0.html)	
Water				
EN8	Total water withdrawal by source.	Fully	DDE: Note 7 Water Consumption and Trade Effluent Discharge (15)	
EN10	Percentage and total volume of water recycled and reused.	Fully	DDE: Note 7 Water Consumption and Trade Effluent Discharge (15)	
Biodiversity				
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	Fully	None. NAB's operations are all located in urban built environments and therefore have no direct impacts on biodiversity rich habitats. This is not relevant to our operations.	
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	Fully	None. NAB's operations are all located in urban built environments and therefore have no direct impacts on biodiversity rich habitats. This is not relevant to our operations.	
EN13	Habitats protected or restored.	Fully	DDE: Biodiversity and ecosystems (7)	
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	Fully	DDE: Biodiversity and ecosystems (7)	
Emissions, effluents and waste				
EN16 ^{COMM}	Total direct and indirect greenhouse gas emissions by weight.	Fully	DDE: Note 3 GHG Emissions (12-13)	
EN17	Other relevant indirect greenhouse gas emissions by weight.	Fully	DDE: Note 3 GHG Emissions (12-13)	
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	Fully	DDE: Note 3 GHG Emissions (12-13)	
EN19	Emissions of ozone-depleting substances by weight.	Fully	DDE: Note 3 GHG Emissions (12-13)	
EN20	NOx, SOx, and other significant air emissions by type and weight.	Fully	DDE: Note 3 GHG Emissions (12-13)	
EN21	Total water discharge by quality and destination.	Fully	DDE: Note 7 Water Consumption and Trade Effluent Discharge (15)	
EN22 ^{COMM}	Total weight of waste by type and disposal method.	Fully	DDE: Note 5 Waste to landfill and recycle (14)	
EN23	Total number and volume of significant spills.	Fully	DDE: (3) There have been no significant spills from any NAB storage facility in the reporting year.	

Products and services				
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	Fully	DDE: Carbon Neutral (4-5) AR: Environment (30-31) WEB: http://www.nabgroup.com/0,,49055,0.html Financial products and services do not typically have direct environmental impacts. There is however an indirect impact through the activities of customers to whom we lend. Our stakeholders have told us that this indirect impact is of concern to them. NAB Group's adoption of the Equator Principles is one way we are reducing the potential environmental and social impact of our lending. Our environmental credit risk policies also help address the potential indirect environmental impacts of our lending.	
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	Fully	None. This indicator is not relevant to the types of products and services provided by our business.	
Compliance				
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	Fully	DDE: (3) During 2011 NAB Group did not incur any fines, penalties, or non-monetary sanctions for non-compliance with any environmental laws and regulations.	
Transport				
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations, and transporting members of the workforce.	Fully	DDE: Note 6 Transport and Travel (15)	
Social: Labour Practices and Decent Work				
Performance Indicator	Description	Reported	Cross-reference/Direct answer	Reason for Omission
Employment				
LA1	Total workforce by employment type, employment contract, and region.	Partially	AR: People (26) DDP: Workforce Statistics (2)	Not material
LA2	Total number and rate of employee turnover by age group, gender, and region.	Fully	AR: People (26) DDP: Employee Turnover (3)	
Labour/management relations				
LA4	Percentage of employees covered by collective bargaining agreements.	Fully	DDP: Collective Bargaining (6) WEB: Industrial Relations http://www.nabgroup.com/0,,91288,0.html#Industrial_Relations	
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	Fully	DDP: Dig Deeper People WEB: http://www.nabgroup.com/0,,48934,00.html NAB has a policy in place with respect to significant organisational change. In each business as part of our collective agreements, there are commitments to consult employees regarding significant organisational change prior to the implementation of that change.	

Occupational health and safety				
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region.	Fully	AR: People (26-27) DDP: Health and Wellbeing (5)	
LA8	Education, training, counselling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	Fully	In Australia and New Zealand, AIDS/HIV is covered by our general OHS policies and processes and our EEO policy. In the UK, NAB has a specific policy on HIV/AIDS. In general, the Group deals with AIDs like any other long-term illness. NAB is an active member of the Australian Bankers Association Pandemic Preparedness Working Group and has developed policies and procedures consistent with the Working Group's guidelines to manage risks such as Pandemic disease outbreaks.	
Training and education				
LA10	Average hours of training per year per employee by employee category.	Fully	DDP: Building Capability (10) WEB: Learning and Development (http://www.nabgroup.com/0,,91288,0.html#Learning_and_Development)	
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	Fully	AR: People (26-27) DDP: Dig Deeper People WEB: Learning and Development (http://www.nabgroup.com/0,,91288,0.html#Learning_and_Development)	
Diversity and equal opportunity				
LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.	Fully	AR: People (26-27) AFR: Governance Diversity (53) DDP: Diversity (4) WEB: Diversity and Inclusion (http://www.nabgroup.com/0,,91288,0.html#Diversity_and_inclusion)	
LA14	Ratio of basic salary of men to women by employee category.	Fully	AR: People (26) DDP: Diversity (4)	
Social: Human Rights				
Performance Indicator	Description	Reported	Cross-reference/Direct answer	Reason for Omission
Investment and procurement practices				
HR1 ^{COMM}	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening.	Fully	Our operations are mainly in OECD countries which have legislation covering human rights issues. Therefore, this is not a material issue for the Bank. Where we invest in non-OECD countries, 100% of project finance deals are assessed against the Equator Principles. We also have put in place a Commitment to Fair International Workforce policy to ensure that we consider human rights in any outsourcing and offshoring activities.	
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken.	Fully	DDSC: Dig Deeper Supply Chain (2) Based on our screening, no suppliers were declined and no conditions imposed, on the basis of not meeting Human Rights screening and criteria.	

Non-discrimination				
HR4	Total number of incidents of discrimination and actions taken.	Fully	<p>DDP: Collective Bargaining (6) NAB Australia had 12 instances of discrimination, 8 were unsubstantiated and 4 substantiated, all involved NAB employees in Australia <u>Outcomes:</u> 1 employee dismissed as a result of complaint 1 matter resolved at Human Rights Equal Opportunity Commission (HREOC) 2 matters resolved following mediation between People Leader and employee.</p> <p>All matters were fully investigated and People Leaders briefed on the outcome. Where it was identified during the investigation process that remedial action was required, this was included in the investigation report. All matters above finally resolved and not subject to further action.</p>	
Freedom of association and collective bargaining				
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights.	Fully	<p>DDP: Collective Bargaining (6) WEB: Industrial Relations (http://www.nabgroup.com/0,,91288,0.html#Industrial_Relations)</p>	
Child labour				
HR6	Operations identified as having significant risk for incidents of child labour, and measures taken to contribute to the elimination of child labour.	Fully	NAB employs an adult professional workforce in all countries in which it operates.	
Forced and compulsory labour				
HR7	Operations identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of forced or compulsory labour.	Fully	NAB does not have operations at risk of forced or compulsory labour. NAB Group has a Commitment to Fair International Workforce Standards (http://www.nabgroup.com.au/vgnmedia/download/CommitmentToFairInternationalWorkforceStandards.pdf) which reiterates our support of the UN Declaration of Human Rights and OECD Guidelines for Multinational Enterprises.	
Social: Society				
Performance Indicator	Description	Reported	Cross-reference/Direct answer	Reason for Omission
Community				
SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	Fully	<p>AR: Community (28-29) DDCM: Dig Deeper Community (2)</p>	
FS13	Access points in low-populated or economically disadvantaged areas by type.	Fully	DDC: Rural Coverage in Australia (2)	

FS14	Initiatives to improve access to financial services for disadvantaged people.	Fully	AR: Customer (24-25), Community (28-29) DDC: Microfinance (8)	
Corruption				
SO2	Percentage and total number of business units analysed for risks related to corruption.	Fully	AFR: Governance (44) NAB has extensive risk management policies and processes in place to reduce the risk related to corruption. We have in place a Code of Conduct, which all employees are made aware of, and must complete training on. We also have operational procedures in place, for relevant areas, which include delegations of authority and role separation so we can reduce the risk of corruption. All business units are required to regularly go through operational risk assessment, therefore reporting on the percentage of business units analysed is not seen as material.	Not material
SO3	Percentage of employees trained in organisation's anti-corruption policies and procedures.	Fully	AFR: Governance (44) Anti-corruption training forms part of our compliance training related to our Code of Conduct. All employees must complete this training.	
SO4	Actions taken in response to incidents of corruption.	Fully	AFR: Governance (44) WEB: (http://www.nabgroup.com/0,,102161,00.html) NAB has in place a compliance training program associated with our Code of Conduct to ensure all employees understand that corrupt behaviour is not acceptable. We also have in place a Whistleblower Protection Program to provide an avenue for employees to raise issues of concern. Each business unit considers risk of corruption as part of overall operational assessment. Some specialised businesses have additional Codes of Conduct, in addition to the Group Code of Conduct, where additional risk has been identified. The Group also has an Anti-fraud policy, which includes consideration on corruption.	
Public policy				
SO5	Public policy positions and participation in public policy development and lobbying.	Fully	AR: Our Responsibility (6) The Australian Government introduced a Lobbying Code of Conduct and a Register of Lobbyists in 2008 which apply to lobbyists who act on behalf of third party clients. Although NAB is not captured under these processes, we are supportive of them. NAB makes submissions to Parliamentary and Government inquiries and these submissions are publicly available on the inquiry websites. A recent example is NAB's submission to the Senate Economics Committee's inquiry into Competition within the Australian banking sector. ABA Submissions: http://www.bankers.asn.au/Policies-and-Submissions/default.aspx Environmental Advocacy: http://www.nabgroup.com.au/0,,54333,0.html	
Compliance				
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	Fully	AFR: Report of the Directors (8)	

Social: Product Responsibility

Performance Indicator	Description	Reported	Cross-reference/Direct answer	Reason for omission
Customer health and safety				
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	Not	This indicator is not relevant to the types of products and services provided by our business. However, we do provide 'health warnings' on our credit card-related direct mail and in branch brochures to help customers to manage their levels of debt.	Not applicable
Product and service labelling				
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	Fully	Each of our key businesses meet product and service information and disclosure requirements relevant to the countries in which our products and services are sold (100%). In Australia, this includes the Code of Banking Practice, the Corporations Act, Trade Practices Act and Privacy Act. Our website includes information on fees, rates, taxes and terms, as well as calculators and tools to help our customers choose the products that are right for them. http://www.nab.com.au/wps/wcm/connect/nab/nab/home/Personal_Finance/6 http://www.nab.com.au/wps/wcm/connect/nab/nab/home/Personal_Finance/1/4/	
FS16	Initiatives to enhance financial literacy by type of beneficiary.	Fully	AR: Community (28-29) WEB: http://www.nabgroup.com/0,,102142,0.html	

Marketing communications				
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	Fully	<p>Compliance training includes a module on trade practices compliance to ensure employees, particularly those in marketing and communications, understand their obligations to provide appropriate information for customers. We also have engaged in a program to simplify our customer communication. We include the appropriate and required product disclosure statements and general advice warnings on our products and services.</p> <p>The Australian Code of Banking Practice sets standards of good banking practice when dealing with individual or small business customers, prospective customers and their guarantors.</p> <p>All banks that adopt the Code are contractually bound by their obligations under the Code. National Australia Bank adopted the revised Code at the end of August 2003.</p> <p>WEB: http://www.nab.com.au/wps/wcm/connect/nab/nab/home/about_us/7/2) WEB: Australian Bankers Association (http://www.bankers.asn.au/) WEB: Corporate Governance http://www.nabgroup.com/0,,33874,00.html) WEB: Group Disclosure & External Communications Policy http://www.nabgroup.com/0,,33874,00.html#CommunicationDisclosure)</p>	
Compliance				
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	Fully	AFR: Report of the Directors (8)	