



**national  
australia  
bank**

# **NATIONAL AUSTRALIA BANK LIMITED**

## **GROUP POLITICAL CONTACT AND COMMUNICATIONS POLICY**

### **Policy Governance Schedule**

<b>Policy Approval Date</b>	December 2022
<b>Next Schedule Review Due</b>	December 2024
<b>Policy Owner</b>	Executive Government Affairs and Public Policy
<b>Division</b>	Corporate Affairs / Chief Operating Office
<b>Approval Authority</b>	Chief Operating Officer

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# 1. OVERVIEW

## 1.1 Purpose and Scope

- 1.1.1 This policy outlines the National Australia Bank Limited (NAB), its controlled entities (the Group) (excluding the Bank of New Zealand) approach for managing political relationships. It is designed to provide a realistic management model, which fosters trusted relationships with all political stakeholders, and ensures that the Group's interests are best promoted.
- 1.1.2 In managing NAB's political relationships, the Group has the following objectives:
- 1.1.2.1 Integrating an understanding of the impacts political relationships can have in achieving business objectives;
  - 1.1.2.2 Managing constructive and positive relationships for the benefit of the Group;
  - 1.1.2.3 Identifying and addressing regulatory opportunities or threats to the Group; and/or
  - 1.1.2.4 Minimising regulatory costs for the Group.
- 1.1.3 This Policy applies specifically to entities and employees of the Group. This approach is designed to ensure political contact and communications are undertaken in a consistent manner across the entire organisation.
- 1.1.4 NAB recognises that it has an important role to play in the Australian political process and plays an important role in the development and promotion of public policy.
- 1.1.5 It is acceptable for NAB to submit our views to Governments and other political stakeholders on matters that affect the Group's interests and operations.

## 1.2 Roles and Responsibilities

- 1.2.1 NAB's Government Affairs & Public Policy team promotes compliance with the policy across the NAB Group by raising visibility and awareness of the policy.

## 1.3 Related Documents

- 1.3.1 Documents related to the Policy include:
- [Code of Conduct](#)
  - [Group Political Contact and Communications Guidance Note](#)
  - [Group Political Contributions Policy](#)
  - [Group Disclosure & External Communications Policy](#)
  - BNZ Political Contact and Communications Policy
  - BNZ Political Donations Policy

## 2. POLICY REQUIREMENTS

### 2.1.1 Political contact

At all times, political contact must only be made by Approved NAB Representatives. All political contact and communication must have full regard for the Group's strategy, NAB's Code of Conduct and a case-by-case approach agreed with the Government Affairs & Public Policy team.

### 2.1.2 Political communications

#### 2.1.2.1 At all times, political communication must only be made by Approved NAB

Representatives. All communication must have full regard for the Group's strategy. Approved NAB Representatives are defined by the Executive Government Affairs & Public Policy, or delegate and in consultation with the Executive Corporate Affairs or relevant Executive Leadership Team member.

#### 2.1.2.2 The content and timing of communications with political interests (via any medium) must be supported by an Approved NAB Representative.

#### 2.1.2.3 Market sensitive material that is subject to an embargo should only be distributed to political interests in accordance with specific embargo restrictions, unless explicitly directed by the Executive, Government Affairs & Public Policy, or delegate and in consultation with the Executive Corporate Affairs or relevant Executive Leadership Team member.

#### 2.1.2.4 All employee invitations to political functions must be notified to the Government Affairs & Public Policy team and approved prior to attendance.

#### 2.1.2.5 Employees are not permitted to attend events held by political parties, parliamentarians or political candidates where a payment or donation is required for entry or participation (refer [Group Political Contributions Policy](#)).

## 3. POLICY EXEMPTIONS

### 3.1 An exemption is required where a business is unable to comply with the mandatory requirements of this Policy for a defined period no greater than 12 months and immediate action cannot be taken to achieve compliance.

### 3.2 Authority for approval of exemptions is held by the Policy Owner and all exemption requests must only be approved by the Policy Owner and will be granted at their discretion. The Policy Owner may seek to escalate to the Executive Corporate Affairs, Chief Operating Officer and/or Group Chief Executive Officer in the event a policy exemption is requested.

### 3.3 Exemptions and extensions to exemptions must be formally recorded as per requirements set out in the [Group Policy Governance Framework](#). In circumstances where the exemption

is expired and the business is not compliant with policy, it is considered as a breach and an event must be raised. Refer to the [Exemptions Procedure Guide](#) for further details.

## 4. POLICY EXCEPTIONS

- 4.1 An exception is required where a Customer, Employee, Division, Sub- Division or Business Unit is unable to comply with the mandatory requirements of this Policy for a defined transaction on a case-by-case basis and immediate action cannot be taken to achieve compliance.
- 4.2 Authority for approval of exceptions is held by the Policy Owner and all exceptions must be submitted to the Policy Owner (or their nominated delegate) and will be granted at their discretion.
- 4.3 Exception requests must be formally recorded as per requirements set out in the [Group Policy Governance Framework](#).

## 5. POLICY BREACHES

- 5.1 Breaches of this Policy (i.e. non-compliance that is not managed via the formal exemption or exception process) must be managed in accordance with the [Colleague Conduct Framework](#) (including the Misconduct Procedure or any superseding policy or framework) and recorded per the [Risk Management Practice Framework Guidance Note](#) or regional equivalents.
- 5.2 All Policy breaches must be communicated immediately to divisional / regional Chief Risk Officer teams. Any material or systemic breach of this Policy must be communicated to the Policy Owner and appropriate remediation measures agreed and implemented.

## 6. POLICY CHANGES

- 6.1 **Administrative Changes**
  - 6.1.1 Administrative changes to this Policy may be approved by the Policy Owner (or if applicable their nominated delegate)
- 6.2 **Other Changes**
  - 6.2.1 All other changes to this Policy must be submitted by Policy Owner/Manager and approved by the Approval Authority.

## 7. GLOSSARY

Term	Definition
Approved NAB Representative	<p>Means:</p> <ul style="list-style-type: none"><li>• Members of the Government Affairs &amp; Public Policy (GAPP) team</li><li>• Members of the Group Executive Leadership Team</li><li>• Members of the NAB Board</li></ul> <p>Others who have been provided explicit approval (on a case-by-case or ongoing basis) by the Executive, Government Affairs &amp; Public Policy (or delegate) in consultation with the Executive Corporate Affairs or relevant Executive Leadership Team member</p>
Political	<p>Means:</p> <ul style="list-style-type: none"><li>• Governments – Federal, State and Territory in Australia;</li><li>• Government departments and agencies;</li><li>• Members of Parliament and their staff; and</li><li>• Political parties and political candidates.</li></ul>