



NATIONAL AUSTRALIA BANK LIMITED

GROUP POLITICAL CONTRIBUTIONS POLICY

Policy Governance Schedule

Policy Approval Date	April 2025
Next Scheduled Review Due	April 2027
Policy Owner	Executive Government Affairs and Public Policy
Division	Corporate Affairs, Customer & Corporate Services
Approval Authority	NAB Board
FAR Accountable Person	Group Executive Customer & Corporate Services

CONTENTS

1. OVERVIEW	3
1.1 Purpose and Scope	3
1.2 Roles and Responsibilities	3
1.3 Related Documents.....	3
2. POLICY REQUIREMENTS	4
3. POLICY EXEMPTIONS	4
4. POLICY EXCEPTIONS.....	4
5. POLICY BREACHES.....	4
6. POLICY CHANGES	5
7. GLOSSARY	6

1. OVERVIEW

1.1 Purpose and Scope

- 1.1.1 This Policy outlines the National Australia Bank Limited (NAB) and its controlled entities' (the Group) approach to political donations. The Group does not make political donations to any political party, Parliamentarian, elected official or candidate for political office. Colleagues do attend some paid events (e.g. business forums and associated events by major political parties) and payment for these events is disclosed as a political contribution to the Australian Electoral Commission in the interests of transparency. This Policy is designed to provide a realistic management model that fosters trusted relationships with all political stakeholders so the Group's interests are best addressed.
- 1.1.2 Managing the risk associated with political contributions builds trust with customers and community and ensures consistent, appropriate, and sustainable outcomes for customers and stakeholders.
- 1.1.3 This Policy applies to all colleagues.

1.2 Roles and Responsibilities

- 1.2.1 NAB Board is responsible for reviewing and approving this Policy.
- 1.2.2 NAB's Government Affairs and Public Policy team (or regional equivalent) is responsible for appropriately reinforcing Policy requirements and ensuring that business procedures implemented are consistent with the terms of this Policy. This includes authorising and approving political contributions on behalf of the Group.
- 1.2.3 NAB's Government Affairs and Public Policy team is responsible for notifying the NAB Board of the Group's political contribution disclosures to the Australian Electoral Commission.
- 1.2.4 Certain NAB Corporate and Institutional Banking (C&IB) and Treasury colleagues¹ are responsible for meeting the Group's obligations under CFTC Regulation 23.451, prohibiting 'pay to play' behaviour.

1.3 Related Documents

- 1.3.1 NAB [Code of Conduct and](#) subsidiary equivalents
- 1.3.2 [Political Contributions Guidance Note](#)
- 1.3.3 [Political Contact and Communications Policy](#)
- 1.3.4 [Political Contact and Communications Guidance Note](#)
- 1.3.5 [Swap Dealer Policy – NAB only](#)
- 1.3.6 [US Political Contributions Fact Sheet – NAB only](#)
- 1.3.7 [BNZ Gift and Entertainment Policy](#)
- 1.3.8 [Gifts and Entertainment Policy](#)
- 1.3.9 [Anti-Bribery and Corruption Policy](#)

¹ Covered Associates, Associated Persons supervising Covered Associates, and ultimately Principals of NAB in its capacity as a Swap Dealer registered under the US Commodity Exchange Act.

2. POLICY REQUIREMENTS

- 2.1.1 Political donations must not be made on behalf of, or subsidised by, the Group.
- 2.1.2 To ensure a colleague's attendance at a political function does not breach this Policy, all invitations must be reviewed by NAB's Government Affairs and Public Policy team (or regional equivalent) before they are accepted.
- 2.1.3 Where payment is required to attend a political function, a colleague must consult with the NAB Executive Government Affairs and Public Policy (or delegate, or regional equivalent) before an invitation is accepted. This will be determined strictly on a case-by-case basis.
- 2.1.4 If a colleague intends to participate outside of work as an individual in the political process they must do so in a personal capacity and make it clear they are not acting on behalf of or representing the Group.
- 2.1.5 For certain NAB colleagues, participation in the political process in a personal capacity is subject to the limitations on political contributions set out in the [Swap Dealer Policy](#) applicable to Covered Associates of NAB in its capacity as a swap dealer.

3. POLICY EXEMPTIONS

- 3.1.1 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.
- 3.1.2 Authority for approval of exemptions is held by the Policy Owner and all exemption requests must only be approved by the Policy Owner (or their nominated delegate) in GRACE and will be granted at their discretion.
- 3.1.3 Exemptions and extensions to exemptions must be formally recorded as per requirements set out in the [Group Policy Governance Policy](#). 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

- 4.1.1 An exception is required where a Customer, Colleague or business 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.
- 4.1.2 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) in GRACE and will be granted at their discretion.
- 4.1.3 Exception requests must be formally recorded as per requirements set out in the Group Policy Governance Policy.

5. POLICY BREACHES

- 5.1.1 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 or](#)

[regional equivalent](#) (including the Misconduct Procedure or any superseding policy or framework) and recorded per the [Event Management Guidance Note](#) or regional equivalent.

- 5.1.2 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

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

7. GLOSSARY

Term	Definition
Colleagues	Permanent employees of NAB Limited and contingent (contract) staff, including employees of subsidiaries, international branches and representative offices.
Group	National Australia Bank Limited (NAB) and its controlled entities, including all subsidiaries, international branches and representative offices.
Political donations	Includes a monetary gift; a non-monetary or 'in kind' gift; and a contribution, entry fee or other payment entitling a person to participate in, or benefit from, a fundraising event, other than in relation to the circumstances outlined in sections 1.1.1. Also includes payments made to, or for the benefit of, a: <ul style="list-style-type: none"> • Political party or political candidate; • Members of Parliament and their staff; • Local government councilor and their staff; • Political candidate; or • Group of political candidates
Political donation or contribution (for United States)	Contribution and expenditure includes, but is not limited to, loans, advances, deposits, purchases, payments, subscriptions, gifts of money, or for the benefit of any political party, committee or candidate for local, state, or federal office or for any other political purpose, even if otherwise condoned by Federal or State law. Indirect contributions, such as payment of a third party as compensation for personal services rendered without charge to a candidate or political committee are also included.
Political (for BNZ)	Means: <ul style="list-style-type: none"> • Governments – Central, Local (including Community boards and other authorities with publicly elected member in New Zealand); • Government Departments and agencies; • Members of Parliament and their staff; • Political parties and political candidates; and • Organisations (formal or informal) established with the purpose to influence the formation, amendment to, or delivery of public policy.
Government Official (for BNZ)	Any official, employee, agent or representative of, or any person acting in an official capacity for or on behalf of, any Governmental Entity, any political party, political party official or candidate for political office, any official, employee, agent or representative of, or any person acting in an official capacity for or on behalf of, a company, business, enterprise or other entity owned, in whole or in part, or controlled by any Governmental Entity or any official, employee, agent or representative of, or any person acting in an official capacity for or on behalf of, a public international organisation.