



20 June 2019

To whom It May Concern:

National Australia Bank is headquartered in Melbourne, Victoria, Australia and is regulated by the Australian Transaction Report and Analysis Centre (“AUSTRAC”) and the Australian Prudential Regulation Authority (“APRA”) in Australia. Outside Australia, its branches and subsidiaries are subject to local regulatory oversight. National Australia Bank is publicly owned and listed on the Australian Stock Exchange (symbol: NAB).

National Australia Bank, its branches and subsidiaries (collectively “NAB”) make every effort to remain in full compliance with all applicable anti-money laundering, counter terrorism financing (“AML/CTF”), and Economic and Trade Sanctions (“Sanctions”) laws, rules and regulatory expectations in the jurisdictions in which it does business.

AML/CTF Policy

The NAB AML/CTF policy is designed to ensure that NAB complies with the key principles and obligations set out in Australia and the jurisdictions it operates. The AML/CTF policy sets out the minimum requirement which must be complied with by the NAB and includes:

- The appointment of a Group Money Laundering Reporting Officer (“MLRO”) and a specialised team, who has responsibility to oversee NAB’s compliance with relevant laws.
- Establishing and maintaining a risk based approach towards assessing and managing the money laundering and terrorist financing risk to NAB.
- Establishing and maintaining risk based customer due diligence, including enhanced customer due diligence for customers presenting a higher risk such as politically exposed persons, trade finance and correspondent banking relationships.
- Establishing and maintaining risk based systems and procedures to monitor ongoing customer activity.
- Procedures for identifying unusual activities and reporting suspicious matters to the relevant law enforcement authority.
- Maintenance of appropriate management information and reporting to senior management of NAB’s compliance with the requirements.
- Training and awareness to all employees.
- Maintenance of appropriate system and control to deal with mandatory regulatory reporting and ad-hoc regulatory enquiries/request.

Sanctions Policy

NAB has implemented a Sanctions Policy which is designed to comply with applicable sanctions requirements which include, but are not limited to sanctions administered and enforced by the United Nations Security Council, Australian Department of Foreign Affairs and Trade (“DFAT”), U.S. Department of the Treasury’s Office of Foreign Assets Control (“OFAC”), the United Kingdom’s Office of Financial Sanctions Implementation (“OFSI”) and other sanctions programs imposed by governments in jurisdictions where NAB operates.

NAB’s Sanctions Policy requires the organisation and its employees to comply with sanctions requirements and take necessary measures to prevent the provision of products and services, or the execution / facilitation of transactions for, on behalf of, or for the benefit of sanctioned

individuals, organisations and entities (“Designated persons”) or sanctioned regions / countries that are in violation of applicable sanctions laws.

Under NAB’s Sanctions Policy, NAB is required to conduct sanctions screening on its customers and transactions against NAB’s mandated sanctions lists. NAB screens its customers at onboarding and on a daily basis thereafter to ensure any changes to its customers details are rescreened and its customers are screened against updated sanctions lists. NAB’s Sanctions Policy also requires periodic screening of its employees and third parties.

NAB may on case-by-case basis request additional information about transactions to confirm whether it is permissible for NAB to process such transactions under applicable sanctions laws and regulations. Failure to provide the requested information may adversely impact NAB’s ability to process such transactions in a timely manner and may result in a delay or refusal to process the transaction. Where required by law or regulation, NAB will block (i.e. freeze) funds and report them to the relevant government authority.

Yours Sincerely

A handwritten signature in black ink, appearing to be the initials 'JMB' followed by a long, sweeping horizontal line that tapers off to the right.

NAB Chief Financial Crime Risk Officer and Group MLRO