

# ANTI-BRIBERY AND CORRUPTION:

## Summary of Policy



The National Australia Bank Group is fully committed to the prevention of financial crime and promotes a culture of compliance with law, honesty and the highest ethical standards in its global activities.

### ANTI-BRIBERY AND CORRUPTION

NAB takes a zero-tolerance approach to bribery and corruption. This is reflected in the NAB Anti-Bribery and Corruption (ABC) Policy as well as the Group's commitment to acting:

- honestly, with integrity and upholding the highest ethical standards in its global activities; and
- in compliance with all applicable anti-bribery and corruption laws in all jurisdictions in which the Group operates.

The prohibition against bribery and corruption in the ABC Policy applies across the Group, including entities and employees, as well as to all agents, contractors and other third parties acting for or on behalf of the Group.

The Group strictly prohibits bribery in any form, including:

- active (giving) or passive (accepting) bribery;
- bribery in the public or private sectors;
- bribery directly by the Group or indirectly through a third party acting for or on behalf of the Group; and
- the use of 'facilitation payments', even if this represents local practice or custom.

Giving or accepting bribes or other improper payments are serious criminal offences and can result in criminal and civil penalties for both corporations and individuals who are involved in the bribery.

The ABC Policy specifically states that charitable donations, sponsorships, or offers of employment cannot be used as a subterfuge for bribery.

Political donations by or on behalf of NAB are prohibited in accordance with the [Group Political Donations Policy](#).

All employees are expected to abide by NAB's [Code of Conduct](#) and to raise any concerns regarding non-compliance with the ABC Policy. The Group maintains processes to enable employees and disclosing persons to raise such concerns in confidence, including NAB's independent whistleblower hotline (via [Faircall](#)).

The ABC Policy is subject to regular review to support continuous improvement.

The ABC Policy is supplemented by supporting procedures which define minimum standards for compliance with the ABC Policy.

#### Key aspects of the ABC Policy include:

- Prohibition against bribery
- Oversight and governance
- A periodic enterprise bribery risk assessment process
- Communication and mandatory training and any role-specific ABC training when assigned
- Dealing with Government Officials
- Review and pre-approval processes
- Use of third parties, agents and other business partners, including requirements to carry out appropriate due diligence before engaging such third parties
- Sponsorships and charitable donations
- Employee due diligence
- Confidential reporting; financial controls and record-keeping
- Investigating and dealing with bribery