



# NATIONAL AUSTRALIA BANK LIMITED

## GROUP POLITICAL CONTRIBUTIONS POLICY

### Policy Governance Schedule

<b>Approval date</b>	September / 2020
<b>Next approval date</b>	September / 2021
<b>Policy Owner</b>	Executive Government Affairs and Public Policy
<b>Division</b>	Corporate Affairs
<b>Approval Authority</b>	Board

## 1 SCOPE AND PURPOSE

- 1.1 This policy outlines the NAB Group's approach to political donations. NAB does not make political donations to any political party, Parliamentarian, elected official or candidate for political office. 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.
- 1.2 For the purpose of this policy, '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 1.3 and 1.4 below. 'Political donations' include payments made to, or for the benefit of a:
  - Political party or political candidate;
  - Members of Parliament and their staff;
  - Local government councillor;
  - Political candidate; or
  - Group of political candidates.
- 1.3 There are some paid business forums and observer programs held by major political parties that NAB Group staff may attend. Attendance at these events is determined by Corporate Affairs in advance of accepting any invitation.
- 1.4 Any payment for attendance at a relevant business forum or observer program will be included in the Australian Electoral Commission register of political donations in the interests of transparency.
- 1.5 NAB recognises that it has an important role to play in the Australian political process and in the development and promotion of policy.
- 1.6 It is acceptable for NAB to submit views to Governments and other political stakeholders on matters that affect the NAB Group's interests and operations, including through paid attendance at business forums and observer programs held by major political parties, in accordance with sections 1.3 and 1.4.

## 2 ROLES AND RESPONSIBILITIES

- 2.1 NAB's Government Affairs & Public Policy team promotes compliance with the policy across the NAB Group.
- 2.2 For NAB employees subject to relevant Dodd Frank compliance obligations, compliance is managed by Office of Chief Compliance Manager

## 3 POLICY REQUIREMENTS

- 3.1 The NAB Board is the sole body authorised to approve political donations in any country or jurisdiction of operation. As such, no political donations may be made on behalf of, or

subsidised, by the Group, other than in relation to the circumstances outlined in sections 1.3 and 1.4.

- 3.2 To ensure that an employee's attendance at a political function does not breach this policy, all invitations must be reviewed by NAB's Corporate Affairs team before they are accepted.
- 3.3 Where payment is required to attend a political function, attendance by a NAB representative will be determined strictly on a case-by-case basis by Corporate Affairs before an invitation is accepted.
- 3.4 Employees may participate outside of work as an individual in the political process provided it is made clear they are not acting on behalf or representing NAB, subject to the limitations on political contributions set out in the Dodd-Frank Act External Business Conduct Policy applicable to Covered Associates of NAB in its capacity as a swap dealer.

## 4 POLICY EXEMPTIONS

- 4.1 An exemption is required where a business is unable to comply with the mandatory requirements of this Policy for a defined period of time no greater than 12 months and immediate action cannot be taken to achieve compliance<sup>1</sup>.
- 4.2 The Approval Authority delegates the approval of exemptions to the Executive General Manager, Corporate Affairs, or for BNZ, the Executive General Manager, Corporate Affairs, BNZ.
- 4.3 [Exemption requests](#)<sup>2</sup> must be submitted to the Executive General Manager, Corporate Affairs, or for BNZ, the Executive General Manager, Corporate Affairs, BNZ and will be granted at their discretion. Refer to the [Exemptions Procedure Guide](#) for further detail.

## 5 POLICY EXCEPTIONS

- 5.1 An exception is required where a 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<sup>1</sup>.
- 5.2 Exception requests must be submitted to the Policy Owner and will be granted at their discretion.

## 6 POLICY BREACHES

- 6.1 Breaches of this Policy (ie. non-compliance that is not managed via the formal exemption or exception process) must be managed in accordance with the [Employee Conduct](#)

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<sup>1</sup> If there is an inconsistency between regional legislative requirements and the Group, the regional requirements will take precedence unless the Policy places a higher requirement. In this case, the Policy will apply unless it results in a breach of local legislation. Where local legislation results in non-compliance to Policy a breach, exemption or exception is not required.

<sup>2</sup> Exemptions must go through the Exemption database for endorsement by CRO and Policy Owner. It then goes to the Approval Authority for approval via the appropriate governance pathways listed in the [NAB Ltd Policy Approval and Review Matrix](#). Regional exemptions (excluding Australia) will follow their own exemption procedures.

[Management Policy](#) and recorded per the [Events Management Standard Operating Procedures](#) or regional equivalents<sup>1</sup>.

- 6.2 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.

## 7 RELATED DOCUMENTS

Documents related to the Policy include:

1. [Code of Conduct](#)
2. [Political Donations Guidance Note](#)
3. [Political Contact and Communications Policy](#)
4. [Political Contact and Communications Guidance Note](#)
5. [Dodd Frank External Business Conduct Standards Policy and Procedures](#)
6. [Dodd Frank US Political Contributions Fact Sheet](#)