

Key Elements of Human Rights Due Diligence Process

1 Risk and Impacts Identification and Assessment:

- Human Rights Policy and related policies
- Equator Principles requirements (applicable project-related transactions)
- High Risk ESG sectors and sensitive areas list* indicates Industry sectors/transactions requiring more detailed ESG due diligence (customers/suppliers)
- Operational risk assessment (corporate structure changes/ employees/own operations)
- Colleague training and awareness
- Media monitoring

Grievance process:

- Human Rights Grievance process (including mechanisms for raising grievances and concerns by internal and external stakeholders). External stakeholders can raise concerns by emailing grievances@nab.com.au

2 Impact Management and Remedy:

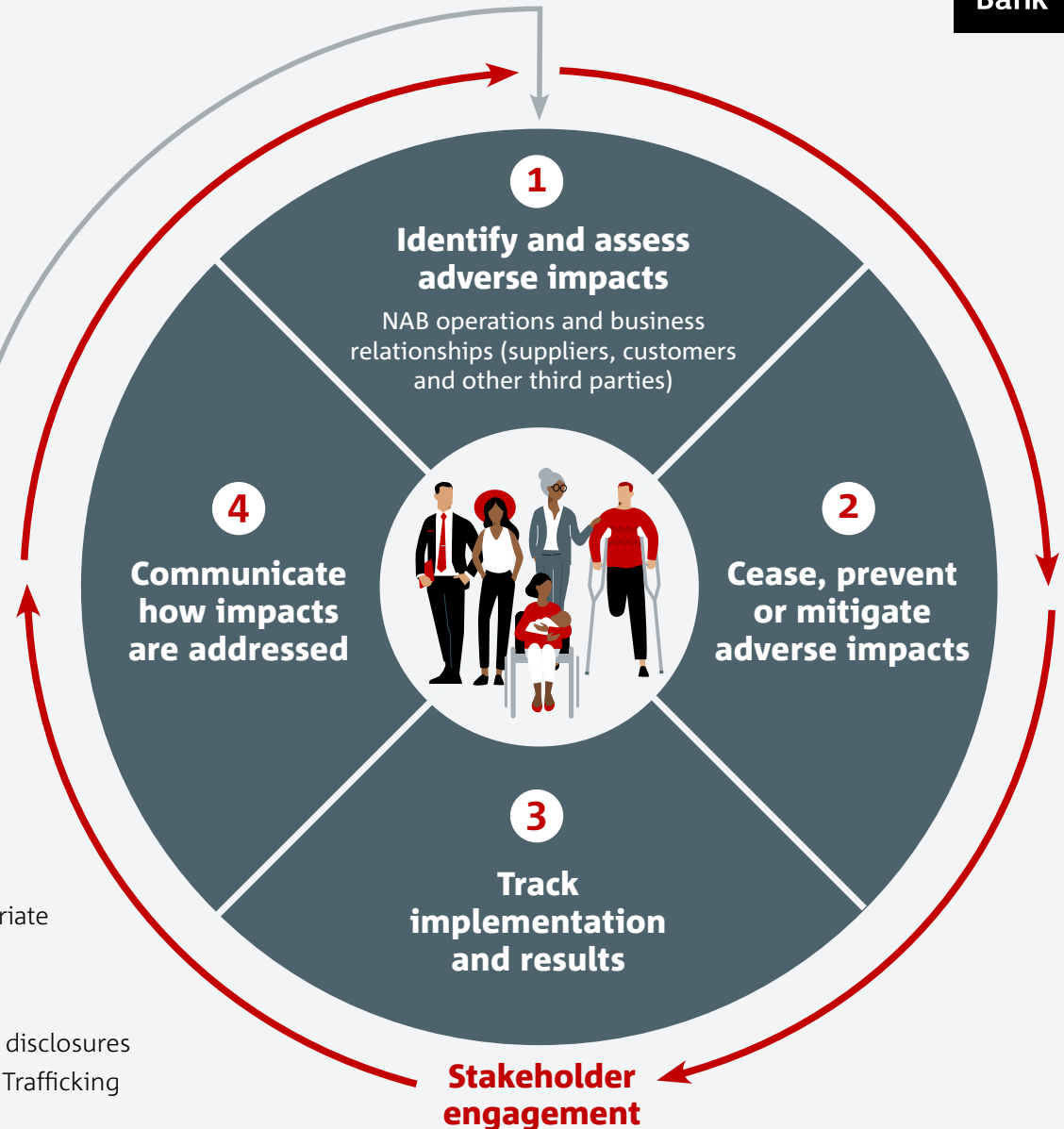
- Stakeholder engagement
- Assess leverage/relationship options
- Corrective action plans
- Improvements to systems and processes
- Provide for, or cooperate in remediation where appropriate

3 Track:

- Corrective action plans
- Follow-up and audits
- Process improvements

4 Communicate:

- Human rights reporting and disclosures
- Modern Slavery and Human Trafficking Statement



Risk Factors Informing Human Rights Due Diligence Process

Salient Human Rights Issues

Refer to NAB Annual Review, including Sustainability Data Pack, for salient issues list and actions. Salient issues include:

- Anti-discrimination, harassment (including sexual harassment) and bullying
- Fair, equitable, diverse, inclusive and flexible employment practices
- Freedom of association and collective bargaining
- Freedom from forced labour, child labour, slavery and servitude (incl. modern slavery/human trafficking)
- Indigenous rights and inclusion

Examples of Vulnerable Groups

These include:

- At risk (e.g. children, elderly, domestic family violence)
- Indigenous peoples
- Rural and regional, local communities, communities subject to resettlement
- Vulnerable workers (e.g. migrant labour, labour hire workers, domestic workers)
- Ethnic, racial, religious and cultural minorities



NAB Modern Slavery Risk Matrix

- Countries and sectors/activities that may have a higher risk of modern slavery

Informs

*High Risk ESG sectors and sensitive areas list

- Industry sectors/transactions requiring more detailed ESG due diligence (customers/suppliers)