

National Australia Bank Limited

GROUP POLITICAL DONATIONS POLICY

Administration Information Schedule

Last review date	August 2017
Next review date	September 2018
Document Owner	General Manager, Government Affairs & Public Policy
Issuing Division / Performance Unit	Government Affairs & Public Policy
Highest approval authority	NAB Board

1. Purpose and Scope

- 1.1 This policy outlines the NAB Group's approach to political donations. NAB does not make donations or contribute funds to any political party, Parliamentarian, elected official or candidate for political office. This policy is designed to provide a realistic management model, which fosters trusted relationships with all political stakeholders, and ensures that the Group's interests are best promoted.
- 1.2 For the purpose of this policy, 'Political' is defined as all:
 - Governments – Federal, State and Local in all jurisdictions;
 - Government Departments and agencies;
 - Members of Parliament and their staff; and
 - Political parties and political candidates.
- 1.3 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 where the amount paid forms part of fundraising proceeds. Political donations include payments made to, or for the benefit of a:
 - political party;
 - member of Parliament;
 - local government councillor;
 - political candidate; or
 - group of political candidates.
- 1.4 This policy applies specifically to entities and employees of the NAB Group. This approach is designed to ensure policy matters are addressed in a consistent manner across the entire organisation.

2. Policy Principles

- 2.1 NAB recognises that it has an important role to play in the Australian political process and in the development and promotion of policy.
- 2.2 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.
- 2.3 The NAB Board believes that the Group can best fulfil its commitment to a balanced approach to stakeholders through continuing to support the community directly, rather than through political donations.
- 2.4 From May 2016 NAB ceased making political donations at the Commonwealth, State and Local Government level.

3. Roles and Responsibilities

- 3.1 NAB's Government Affairs & Public Policy team promotes compliance with the policy across the NAB Group.

4. Policy Requirements

- 4.1 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. The Board resolved in May 2016 that the making of any political donations would cease with immediate effect.
- 4.2 Employees may be involved in meetings, events or activities organised by political parties or political candidates provided that:
 - the involvement is for business purposes only; and

- no payment is required for entry or participation .
- 4.3 To ensure that an employee's attendance at a political function does not breach this policy, all invitations must be reviewed by NAB's Government Affairs & Public Policy team before they are accepted.
- 4.4 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.

5. Policy Exemptions

- 5.1 Exemptions to this policy need to be approved by the NAB Board upon recommendation from the General Manager, Government Affairs & Public Policy.

6. Policy Breaches

- 6.1 Failure to comply with this policy may result in disciplinary action, dismissal and prosecution or other external or regulatory action.

7. Related Documents

- Code of Conduct
- Political Donations Guidance Note
- Political Contact and Communications Policy
- Political Contact and Communications Guidance Note

For further information or guidance in relation to this policy, please contact the General Manager, Government Affairs & Public Policy.