

Summary of the

GROUP WHISTLEBLOWER PROTECTION POLICY¹

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than
money



Principles

The National Australia Bank Group (**Group**) Whistleblower Protection Policy (**Policy**) and its Whistleblower Program reflects the Group's commitment to the highest standards of ethical conduct in all the Group's activities by:

- o encouraging the reporting of suspected or actual **wrongdoing**;
- o protecting and supporting the dignity, wellbeing, career and good name of **disclosing persons** who report suspected or actual **wrongdoing** to the Whistleblower Program; and
- o contributing to a culture of continuous improvement.

The Policy is applicable to all employees and entities within the Group, and also the additional people specified in the definition of '**disclosing persons**' below. It is important for disclosing persons to be aware that, in addition to the Policy, certain statutory protections and private rights may be available for protected disclosures under Australian legislation.

Who can make a disclosure to the Whistleblower Program?

Under the Policy, any of the following **disclosing persons** can disclose suspected or actual **wrongdoing** to NAB's Whistleblower Program:

- (a) director of a Group entity;
- (b) officer of a Group entity;
- (c) employee of a Group entity;
- (d) contractor (including a contractor for the supply of services or goods or any employee of the same) engaged by or on behalf of a Group entity;
- (e) subcontractor engaged by or on behalf of a Group entity;
- (f) agent of the Group;
- (g) employee of an outsourced services provider undertaking work on behalf of any business unit within the Group;
- (h) person who works for the organisation as a volunteer without reward or expectation of reward for that work;
- (i) former employee of a Group entity (being those persons who have ceased to be employed by NAB (whether voluntarily or otherwise)); and
- (j) former non-executive director of a Group entity.

What wrongdoing can be reported to the Whistleblower Program?

NAB encourages the reporting of suspected or actual **wrongdoing** – being conduct that is illegal, unacceptable or undesirable, or concealment of such conduct. It includes but is not limited to:

Fraud

Dishonest activity that causes actual or potential financial loss, or an unjust advantage, to the Group or any person or organisation, including activity involving customers or third parties where Group systems and process are involved.

Questionable accounting or auditing practices

Accounting/auditing practices that may be technically legal, but do not comply with the intent or spirit of the law accounting or auditing standard.

Adverse behaviour

Unethical behaviour or wrongdoing, including breaches of the Group's policies and codes of conduct.

Other serious improper conduct that may be detrimental to the interests of the Group or cause either financial or non-financial loss.

Potential cases of modern slavery or human trafficking – including within the Group's supply chain or customers.

Legal or regulatory non-compliance

Illegal behaviour (e.g. theft, drug sale/use, violence or threatened violence and criminal damage against property) and breach of any applicable legislation/regulations.

Bribery

Providing, offering or causing a benefit to another person (or soliciting or receiving a benefit from another person) with the intention of influencing for a business or personal advantage, where the benefit is not legitimately due and regardless of whether the recipient is the intended target of the benefit.

Corrupt behaviour

An employee or contractor dishonestly acting, or dishonestly failing to act, in the performance of functions of their employment, or dishonestly taking advantage of their employment to obtain benefit for himself or herself, the Group or for another person or organisation, or to cause loss to another party/person.

How can Disclosing Persons disclose Wrongdoing to the NAB Whistleblower Program?

The Policy establishes a number of different channels under which **disclosing persons** can report suspected or actual **wrongdoing** to the Whistleblower Program. These include an independently monitored external hotline and reporting service, called Faircall, which is operated by KPMG.

Disclosing persons can make a disclosure of any suspected or actual wrongdoing (a **wrongdoing disclosure**) to the Whistleblower Program via Faircall as follows:

Country	Phone	Email	Web	Post
Australia	1800 874 979	faircallnab@kpmg.com.au	faircalldisclosure. kpmg.com.au/nab 	FairCall Manager KPMG Forensics PO Box H67 Australia Square Sydney NSW 1213
New Zealand	0800 746 304			
United Kingdom	08082343976			
Canada	1844 787 5910			
Japan	0034 800 400468			
Singapore	800 6167 104			
Indonesia	00180 361 586			
United States of America	184447 99474			
Vietnam	8523 068 9976			
Peoples Republic of China	N/A			
Hong Kong	800 961 669	faircall@ethicsshelpline.co.in		
India	1800 3010 6225			

Support and protection

NAB is committed to providing fairness, support and protection in response to reports of **wrongdoing** and will not tolerate any reprisals, or threats of reprisal, by any member of the Group against a **disclosing person**.

The Whistleblower Program will take appropriate measures to support a **disclosing person's** wellbeing and protect **disclosing persons** (excluding former employees and former non-executive directors) from adverse action by the Group due to their **wrongdoing disclosure** (even if the **wrongdoing disclosure** is subsequently determined to be incorrect or is not substantiated).

Anonymity and confidentiality

Wrongdoing disclosures may be submitted to the Whistleblower Program anonymously.

The Whistleblower Program will not disclose (i) the substance of a **wrongdoing disclosure** (ii) the identity of the **disclosing person** (if known) and (iii) any information likely to lead to the identification of the **disclosing person** without obtaining the **disclosing person's** prior consent¹.

Where KPMG collects uses and discloses personal information as part of the Faircall service, it does so in accordance with KPMG Australia's privacy statement, available at: www.kpmg.com/AU/faircallprivacy.

Where a **disclosing person** provides their contact details to Faircall, those contact details will not be provided to the Group without the disclosing persons' consent.

Roles and responsibilities

Overall governance of the Whistleblower Program is undertaken by NAB's Board Audit Committee (**BAC**) via the Group Whistleblower Committee (**GWC**), which provides governance oversight.

The Whistleblower Program is responsible for reporting on the performance of and work undertaken by the Whistleblower Program to the GWC, the BAC and/or any regional or subsidiary board(s) or committee(s), where applicable, on a regular basis. Anonymity and confidentiality requirements (including legislative non-disclosure requirements) will be observed in the reporting process.

The day to day operation of the Whistleblower Program is managed by Internal Audit.

¹ Disclosures that involve a threat to life or property, a crime, or regulatory or legal action against the Group may require actions that do not allow for complete anonymity. Should it be necessary to disclose the identity of the disclosing person in these circumstances, reasonable steps will be taken to obtain the consent of the disclosing person first.

ⁱ This document has been prepared for publication on the Group website so that non-banking employees covered by the National Australia Bank Group Whistleblower Protection Policy can understand and access the Group Whistleblower Program.