

2020 - 21 Compliance Program

Submitted by:

**National Australia Bank Limited
(ABN:12004044937)**

Mlc Wealth Limited (ABN:97071514264)



#Workplace overview

Policies and strategies

1: Do you have a formal policy and/or formal strategy in place that specifically supports gender equality in the following areas?

...Recruitment	Yes(<i>Select all that apply</i>)
...Yes	Policy
...Retention	Yes(<i>Select all that apply</i>)
...Yes	Policy
...Performance management processes	Yes(<i>Select all that apply</i>)
...Yes	Policy
...Promotions	No(<i>Select all that apply</i>)
...No	Other (please provide)
...Other (please provide)	Work is underway to redefine what constitutes a promotion
...Talent identification/identification of high potentials	Yes(<i>Select all that apply</i>)
...Yes	Policy
...Succession planning	Yes(<i>Select all that apply</i>)
...Yes	Policy
...Training and development	Yes(<i>Select all that apply</i>)
...Yes	Policy
...Key performance indicators for managers relating to gender equality	Yes(<i>Select all that apply</i>)
...Yes	Policy

2: Do you have formal policy and/or formal strategy in place that support gender equality overall?

Yes(*Select all that apply*)

...Yes	Policy
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3: If your organisation would like to provide additional information relating to your gender equality policies and strategies, please do so below.

Creating an inclusive workforce is fundamental to maximising diversity and succeeding in the global environment. At NAB, diversity of thought, background and experience is respected, valued and promoted. Our Diversity and Inclusion Strategy 2017-2020 outlined our plan to continue building a culture of inclusion, with a focus on gender equality, life stage (graduates, parents, mature age), LGBTI+, accessibility and cultural inclusion.

In September 2020, NAB's Board approved a new Group Inclusion & Diversity Policy, committing to value and respect the diversity of our colleagues, customers, suppliers and communities to seek to ensure a positive experience for all. The new Policy aims to:

- Attract and retain diverse teams, enhancing our approach to decision making and innovating for the future.
- Empower individuals to work and grow together in an inclusive, safe and flexible way.
- Leverage the diversity of skills to enhance the customer experience and organisational growth.
- Design accessible products and services for financial inclusion and those who are vulnerable.
- Support our local communities and be proud of NAB's brand and reputation.

The Board set measurable objectives for FY21-FY25 which are outlined in the Policy. These are:

- Diverse leadership teams and talent pipelines which includes:
 - At each salary level 40-60% of either gender represented.
 - NAB Board (non-executive directors) 40-60% of either gender represented.
 - NAB Group subsidiary boards 40-60% of either gender represented.
 - Inclusive workforce culture – Engagement Score top 20% (including diverse segments).
 - Fair remuneration – seek to reward colleagues fairly and support NAB's objective of gender pay equity <10% by 2025.

To support leadership accountability of the measurable objectives, key performance indicators will be put in place for all people leaders. Further, these measurable objectives will be evaluated against internal targets and appropriate external benchmarks annually and reported to the Board.

Governing bodies

1: Does this organisation have a governing body?	Yes(<i>Provide further details on the governing body(ies) and its composition</i>)
1.1: What is the name of your governing body?	National Australia Bank Limited Board of Directors
1.2: What type of governing body does this organisation have?	Board of directors
1.3: How many members are on the governing body and who holds the predominant Chair position?	
...Chairs	
...Female (F)	0
...Male (M)	1
...Gender X	0
...Members	
...Female (F)	3
...Male (M)	5
...Gender X	0
1.4: Do you have a formal selection policy and/or formal selection strategy for this organisation's governing body members?	Yes(<i>Select all that apply</i>)
1.5: Has a target been set to increase the representation of women on this governing body?	Yes(<i>Provide further details on your target</i>)
10.6: What is the percentage (%) target?	40.00%
10.7: What year is the target to be reached (select the last day of the target year)?	30-Sep-2025
11.1: Confirm how the ultimate parent's governing body/ies are being reported:	

MLC Wealth Limited

1: Does this organisation have a governing body?	Yes(<i>Provide further details on the governing body(ies) and its composition</i>)
1.1: What is the name of your governing body?	MLC Wealth Limited
1.2: What type of governing body does this organisation have?	Board of directors
1.3: How many members are on the governing body and who holds the predominant Chair position?	
...Chairs	
...Female (F)	0
...Male (M)	1
...Gender X	0
...Members	

...Female (F)	1
...Male (M)	1
...Gender X	0
1.4: Do you have a formal selection policy and/or formal selection strategy for this organisation's governing body members?	Yes(<i>Select all that apply</i>)
1.5: Has a target been set to increase the representation of women on this governing body?	Yes(<i>Provide further details on your target</i>)
10.6: What is the percentage (%) target?	40.00%
10.7: What year is the target to be reached (select the last day of the target year)?	30-Sep-2025
11.1: Confirm how the ultimate parent's governing body/ies are being reported:	

2: If your organisation would like to provide additional information relating to governing bodies and gender equality in your workplace, do so below.

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#Action on gender equality

Gender pay gaps

1: Do you have a formal policy and/or formal strategy on remuneration generally?

Yes(*Select all that apply*)

...Yes	Policy Strategy
1.1: Are specific pay equity objectives included in your formal policy and/or formal strategy?	Yes(<i>Select all that apply</i>)
...Yes	To achieve gender pay equity To be transparent about pay scales and/or salary bands To ensure managers are held accountable for pay equity outcomes To implement and/or maintain a transparent and rigorous performance assessment process

2: Did your organisation receive JobKeeper payments?

No

3: What was the snapshot date used for your Workplace Profile?

30-Sep-2020

4: If your organisation would like to provide additional information relating to gender pay gaps in your workplace, please do so below.

NAB is committed to year-on-year improvements in how it uses its data analytics to understand any gender pay gap. The focus for 2021 is understanding the factors which may cause pay gaps.

Employer action on pay equity

1: Have you analysed your payroll to determine if there are any remuneration gaps between women and men (e.g. conducted a gender pay gap analysis)?

Yes(*Provide further details on the most recent gender remuneration gap analysis that was undertaken.*)

1.1: When was the most recent gender remuneration gap analysis undertaken?	Within the last 1-2 years
1.2: Did you take any actions as a result of your gender remuneration gap analysis?	Yes(<i>Select all that apply</i>)

1.2: Did you take any actions as a result of your gender remuneration gap analysis?	<p>Created a pay equity strategy or action plan</p> <p>Identified cause/s of the gaps</p> <p>Reviewed remuneration decision-making processes</p> <p>Analysed commencement salaries by gender to ensure there are no pay gaps</p> <p>Analysed performance pay to ensure there is no gender bias (including unconscious bias)</p> <p>Analysed performance ratings to ensure there is no gender bias (including unconscious bias)</p> <p>Set targets to reduce any organisation-wide gap</p>
.. Yes	<p>Reported pay equity metrics (including gender pay gaps) to the governing body</p> <p>Reported pay equity metrics (including gender pay gaps) to the executive</p> <p>Reported pay equity metrics (including gender pay gaps) to all employees</p> <p>Reported pay equity metrics (including gender pay gaps) externally</p> <p>Corrected like-for-like gaps</p>
1.3: You may provide details below on the type of gender remuneration gap analysis that has been undertaken (for example like-for-like and/or organisation-wide)	NAB undertakes gender pay gap analysis annually. In the reporting period, This has included a organisational wide pay gap analysis and a like for like analysis.

2: If your organisation would like to provide additional information relating to employer action on pay equity in your workplace, please do so below.

Employee consultation

1: Have you consulted with employees on issues concerning gender equality in your workplace?

Yes (*Provide further details on the employee consultation process.*)

1.1: How did you consult employees?	<p>Survey</p> <p>Consultative committee or group</p> <p>Focus groups</p> <p>Other (provide details)</p>
...Other (provide details)	Executive Leadership Team performance discussions
1.2: Who did you consult?	ALL staff

2: If your organisation would like to provide additional information relating to employee consultation on gender equality in your workplace, please do so below.

#Employee work/life balance

Flexible working

1: Do you have a formal policy and/or formal strategy on flexible working arrangements?

Yes(*Select all that apply*)

...Yes	Policy
...A business case for flexibility has been established and endorsed at the leadership level	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	30-Sep-2021
...Leaders are visible role models of flexible working	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	30-Sep-2021
...Flexible working is promoted throughout the organisation	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	30-Sep-2021
...Targets have been set for engagement in flexible work	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	30-Sep-2021
...Targets have been set for men's engagement in flexible work	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	30-Sep-2021
...Leaders are held accountable for improving workplace flexibility	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	30-Sep-2021
...Manager training on flexible working is provided throughout the organisation	No(<i>Select all that apply</i>)
	Currently under development(<i>Select the</i>

...No	<i>estimated completion date.)</i>
...Currently under development	30-Sep-2021
...Employee training is provided throughout the organisation	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.)</i>
...Currently under development	30-Sep-2021
...Team-based training is provided throughout the organisation	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.)</i>
...Currently under development	30-Sep-2021
...Employees are surveyed on whether they have sufficient flexibility	Yes
...The organisation's approach to flexibility is integrated into client conversations	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.)</i>
...Currently under development	30-Sep-2021
...The impact of flexibility is evaluated (e.g. reduced absenteeism, increased employee engagement)	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.)</i>
...Currently under development	30-Sep-2021
...Metrics on the use of, and/or the impact of, flexibility measures are reported to key management personnel	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.)</i>
...Currently under development	
...Metrics on the use of, and/or the impact of, flexibility measures are reported to the governing body	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.)</i>
...Currently under development	30-Sep-2021
2: Do you offer any of the following flexible working options to MANAGERS in your workplace?	
...Flexible hours of work	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available Informal options are available

...Compressed working weeks	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Time-in-lieu	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Telecommuting (e.g. working from home)	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Informal options are available Formal options are available
...Part-time work	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Job sharing	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Carer's leave	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Purchased leave	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Unpaid leave	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available

3: Are your flexible working arrangement options for NON-MANAGERS the same as the options for managers above?

Yes

4: Were managers in your organisation allowed to make INFORMAL flexible working arrangements with their team members in response to the COVID-19 pandemic?

Yes, ALL managers

5: Did you see an increase, overall, in the approval of FORMAL flexible working arrangements for your workforce compared to pre-COVID-19?

No

6: If your organisation would like to provide additional information relating to flexible working and gender equality in your workplace, please do so below.

#Employee support

Paid parental leave

1: Do you provide employer funded paid parental leave regardless of carer's status (i.e. primary/secondary) in addition to any government funded parental leave scheme?

Yes, we offer employer funded parental leave (using the primary/secondary carer definition)

1.1: Do you provide employer funded paid parental leave for primary carers in addition to any government funded parental leave scheme?	Yes(<i>Please indicate how employer funded paid parental leave is provided to the primary carers.</i>)
1.1.a: Please indicate whether your employer-funded paid parental leave for primary carers is available to:	All, regardless of gender
1.1.b: Please indicate whether your employer-funded paid parental leave for primary carers covers:	Birth Adoption Surrogacy Stillbirth
1.1.c: How do you pay employer funded paid parental leave to primary carers?	Paying the employee's full salary
1.1.d: Do you pay superannuation contribution to your primary carers while they are on parental leave?	Yes, on employer funded parental leave
1.1.e: How many weeks (minimum) of employer funded paid parental leave for primary carers is provided?	12
1.1.f: What proportion of your total workforce has access to employer funded paid parental leave for primary carers, including casuals?	91-100%
1.2: Do you provide employer funded paid parental leave for secondary carers in addition to any government funded parental leave scheme?	Yes(<i>Please indicate how employer funded paid parental leave is provided to the secondary carers.</i>)
1.2.a: Please indicate whether your employer-funded paid parental leave for secondary carers is available to:	All, regardless of gender
1.2.b: Please indicate whether your employer-funded paid parental leave for secondary carers covers:	Birth Adoption Surrogacy Stillbirth
1.2.c: How do you pay employer funded paid parental leave to secondary carers?	Paying the employee's full salary

1.2.d: Do you pay superannuation contribution to your secondary carers while they are on parental leave?	Yes, on employer funded parental leave
1.2.e: How many weeks (minimum) of employer funded paid parental leave for secondary carers is provided?	2
1.2.f: What proportion of your total workforce has access to employer funded paid parental leave for secondary carers, including casuals?	90-100%

2: If your organisation would like to provide additional information relating to paid parental leave and gender equality in your workplace, please do so below.

Support for carers

1: Do you have a formal policy and/or formal strategy to support employees with family or caring responsibilities?

Yes(Select all that apply)

...Yes	Policy
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2: Do you offer any of the following support mechanisms for employees with family or caring responsibilities?

...Employer subsidised childcare	Yes(Please indicate the availability of this support mechanism.)
...Yes	Available at SOME worksites
...On-site childcare	Yes(Please indicate the availability of this support mechanism.)
...Yes	Available at SOME worksites
...Breastfeeding facilities	Yes(Please indicate the availability of this support mechanism.)
...Yes	Available at SOME worksites
...Childcare referral services	Yes(Please indicate the availability of this support mechanism.)
...Yes	Available at ALL worksites
...Internal support networks for parents	Yes(Please indicate the availability of this support mechanism.)
...Yes	Available at ALL worksites
...Return to work bonus (only select if this bonus is not the balance of paid parental leave)	Yes(Please indicate the availability of this support mechanism.)
...Yes	Available at ALL worksites
...Information packs for new parents and/or those with elder care responsibilities	Yes(Please indicate the availability of this support mechanism.)
...Yes	Available at ALL worksites
...Referral services to support employees with family and/or caring responsibilities	Yes(Please indicate the availability of this support mechanism.)

...Yes	Available at ALL worksites
...Targeted communication mechanisms (e.g. intranet/forums)	Yes(<i>Please indicate the availability of this support mechanism.</i>)
...Yes	Available at ALL worksites
...Support in securing school holiday care	Yes(<i>Please indicate the availability of this support mechanism.</i>)
...Yes	Available at SOME worksites
...Coaching for employees on returning to work from parental leave	Yes(<i>Please indicate the availability of this support mechanism.</i>)
...Yes	Available at ALL worksites
...Parenting workshops targeting mothers	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Not a priority
...Parenting workshops targeting fathers	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Not a priority
...Other (provide details)	No

3: If your organisation would like to provide additional information relating to support for carers in your workplace, please do so below.

Sex-based harassment and discrimination

1: Do you have a formal policy and/or formal strategy on sex-based harassment and discrimination prevention?

Yes(*Select all that apply*)

...Yes	Policy
1.1: Do you provide a grievance process in any sex-based harassment and discrimination prevention formal policy and/or formal strategy?	Yes

2: Do you provide training on sex-based harassment and discrimination prevention to the following groups?

...All managers	Yes(<i>Please indicate how often is this training provided (select all that apply):</i>)
...Yes	At induction At least annually
...All employees	Yes(<i>Please indicate how often is this training provided (select all that apply):</i>)
...Yes	At induction At least annually

3: If your organisation would like to provide additional information relating to sex-based harassment and discrimination, please do so below.

Family or domestic violence

1: Do you have a formal policy and/or formal strategy to support employees who are experiencing family or domestic violence?

Yes (*Select all that apply*)

...Yes	Policy
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2: Other than a formal policy and/or formal strategy, do you have the following support mechanisms in place to support employees who are experiencing family or domestic violence?

...Employee assistance program (including access to psychologist, chaplain or counsellor)	Yes
...Training of key personnel	Yes
...A domestic violence clause is in an enterprise agreement or workplace agreement	Yes
...Workplace safety planning	Yes
...Access to paid domestic violence leave (contained in an enterprise/workplace agreement)	Yes
...Access to unpaid domestic violence leave (contained in an enterprise/workplace agreement)	No (<i>Select all that apply</i>)
...No	Other (provide details)
...Other (provide details)	Paid Domestic and Family Violence leave is uncapped
...Access to paid domestic violence leave (not contained in an enterprise/workplace agreement)	No (<i>Select all that apply</i>)
...No	Other (provide details)
...Other (provide details)	Access to paid Domestic and Family Violence leave is included in our Enterprise Agreement
...Access to unpaid leave	Yes
...Confidentiality of matters disclosed	Yes
...Referral of employees to appropriate domestic violence support services for expert advice	Yes
...Protection from any adverse action or discrimination based on the disclosure of domestic violence	Yes
...Flexible working arrangements	Yes
...Provision of financial support (e.g. advance bonus payment or advanced pay)	Yes
...Offer change of office location	Yes
...Emergency accommodation assistance	Yes
...Access to medical services (e.g. doctor or nurse)	No (<i>Select all that apply</i>)

...No	Other (provide details)
...Other (provide details)	Not currently provided by NAB but may be included as part of referral services accessed by employees
...Other (provide details)	No(<i>Select all that apply</i>)

3: If your organisation would like to provide additional information relating to family and domestic violence affecting your workplace, please do so below.

In 2020, NAB launched the NAB Employee Support Hub which supports colleagues experiencing domestic and family violence, financial hardship, mental health and serious illness, problem gambling and other personal circumstances which may impact their banking. This support hub provides an additional layer of support and care to colleagues during times of vulnerability. This line is specifically for colleagues and is confidential.