

more
than
money



NATIONAL AUSTRALIA BANK

Code of Conduct

MESSAGE FROM THE GROUP CHIEF EXECUTIVE OFFICER



I am a proud banker, having worked only in a bank my entire career.

I believe that banking is a profession that is and must be based on trust, respect and integrity.

Indeed, the Banking and Finance Oath, which I have signed, says: “Trust is the foundation of my profession”. This was true when I started my career – and it remains true today.

We must do the right thing for our customers, our people, our shareholders and the community. This will also ensure we have a sustainable business.

At NAB, our culture is shaped by our values, which reinforce that we care about how we do things, not just what we do. Our five core values: passion for customers; win together; be bold; respect for people; and do the right thing, drive everything we do at NAB.

These values underpin the Codes of Conduct that we have in all the regions in which we operate. Our Codes set out the standard of conduct required of every employee, and everyone working on our behalf, including contractors, consultants and directors.

The Codes cover a range of situations, but there is no substitute for good judgment. We must always consider whether our actions reflect NAB’s culture, and hold each other to account.

We have high standards of behaviour, and there are consequences if people do not meet these standards. We will also comply with our obligations to report breaches of the law to appropriate authorities.

If you have concerns about the behaviour of anyone at NAB, I urge you to either talk to your people leader, raise it through the People Advisory Centre or use the independent FairCall Service. Whistleblowers will be supported and protected, and you can choose to remain anonymous.

As employees of NAB, we all have a huge responsibility to get it right for our customers. We are crucial to their lives, and to helping the economy grow.

No matter where you work in the Group, you will play a role in helping to achieve our vision to become Australia and New Zealand’s most respected bank.

Respect will be earned through our decisions and behaviours – through living our values each and every day.

On behalf of the Executive Leadership Team, I look forward to working with you.

Andrew Thorburn

Group Chief Executive Officer
National Australia Bank Limited

NATIONAL AUSTRALIA BANK GROUP COMMITMENTS

We conduct ourselves professionally

We behave in a professional manner that fosters trust, confidence and goodwill in customers, colleagues, suppliers and the community and respects human rights.

We act with honesty, integrity and fairness

We act with honesty, integrity and fairness; we speak up and escalate any concerns.

We manage conflicts of interest

We ensure our personal and business interests never interfere with our ability to make sound, objective decisions.

We meet our legal and regulatory obligations, voluntary commitments and internal standards

We comply with all laws, regulations and Codes that are applicable to us, including internal NAB policies and voluntary commitments.

We adhere to confidentiality and privacy requirements

We protect confidential information regarding customers, suppliers, colleagues and our business affairs.

We deal with, and report on, suspected breaches

We investigate, deal with and appropriately report on suspected breaches of our Code.

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1. PERSONAL CONDUCT

We behave in a professional manner that fosters trust, confidence and goodwill in customers, colleagues, suppliers and the community and respect human rights in keeping with the [Group Human Rights Policy](#).

At all times, both in and out of work:

- Treat others with dignity, fairness and respect
- Comply with all policies, procedures, laws and regulations applying to your role and hold yourself accountable and beyond reproach for your actions
- Only access information relating to a work colleague or customer with specific authorisation based on a work-related need
- Keep your accounts in order at all times and comply with the terms and conditions applying to any product you use. Employee's Choice benefits may be withdrawn where there is continued non-compliance with product terms and conditions. Additional action may also be taken where appropriate.

Where to seek assistance

If you are experiencing any financial or personal difficulties that may result in non-compliance, there is support available. You should speak with your people leader or Workplace Relations via the People Advisory Centre, who will assist and may direct you to suitable resources. The [Employee Assistance Program \(EAP\)](#) is also available to provide independent and confidential counselling services for any work or non-work-related difficulties you may be facing.

Greg uses NAB tools to harass

Greg has recently gone through a messy separation from his partner. He sent numerous abusive texts and emails to his ex-partner threatening to harm her and her family. The texts and emails were sent using his NAB email account and his work-supplied mobile telephone. Greg's people leader, Michelle became aware of the threatening behaviour after being contacted by the Police.

After a thorough investigation, it was found that Greg's actions breached both the [Serious Misconduct Policy](#) and the Group Information Security Policy. As a result Greg's employment was terminated with immediate effect. He was provided with access to the [Employee Assistance Program](#).

David's inappropriate behaviour

David was at a work-organised function. During the function he consumed a lot of alcohol and at one point he tried to grab Joanne around the waist and kiss her. Later in the night, he again approached Joanne and made inappropriate suggestions to her.

Joanne raised a complaint about David to Workplace Relations, via the [People Advisory Centre](#). Following a full investigation into the matter, David was found to have breached NAB's [Group Discrimination and Harassment Policy](#) and his employment was terminated. NAB's Group Discrimination and Harassment Policy applied to David and his conduct even though the function was outside the office because it was a work-related function.

As a result of the incident, David's people leader was issued with a warning for failing to ensure alcohol was served responsibly and for not immediately addressing David's unacceptable behaviour.

Not "just a joke"

A team of employees often engaged in what some thought was innocent and jovial 'banter' to make their workplace fun and make it easier to deal with a high workload. One day a group of employees from this team engaged in 'banter' about Tony, including impersonating his supposed feminine characteristics. One of the team, William, also commented about Tony's shirt saying that he was "wearing his gay shirt today". Tony didn't take offence to the comments as he knew the group were only joking, as they often do. Jane, however, felt the banter was offensive so she spoke to some of the group about their comments. Their response was "they were only joking".

Not satisfied with this response, Jane spoke to her people leader, who counselled the offending employees and advised that behaving in such a manner was unacceptable.

The employees were required to apologise to Tony and, to read the Code of Conduct and NAB's [Group Discrimination and Harassment Policy](#). They were also warned that any further instances of such behaviour would lead to further disciplinary action.

2. USE OF INFORMATION AND INFORMATION SYSTEMS

We must use our computer, telephone, other devices and network systems appropriately at all times.

We must never use these devices and systems to:

- Communicate, view or distribute inappropriate, sexually explicit or offensive material
- Spread profane, derogatory, discriminatory or harassing comments, or threatening or abusive language

For more information, see our [Group Information Security Policy](#) and [Use of Information and Information Systems – Standard Operating Procedures](#).

If you receive inappropriate material, you should immediately delete it and notify the sender to stop sending such material. You should also notify your people leader. Accidental connection to an inappropriate website must be disconnected immediately.

Your login details must not be provided to anyone. Sharing login details and passwords contravenes our policies and procedures. You are presumed responsible for all actions undertaken using your identity/login and must protect these from use by others.

Employees should be aware that NAB conducts surveillance by accessing and monitoring Group Information Systems on an ongoing, continuous basis. Therefore you should have no expectation of privacy regarding your access to and use of Group Information Systems. For more information, see [email and internet monitoring](#) at NAB.

Systems such as Outlook, SAP and [FlexiPurchase](#) have delegation functions which must be used when access by a colleague is required.

Unauthorised distribution or copying of NAB business information, including personal, customer and market information, contravenes our policies and procedures and may cause NAB to breach its legal and regulatory obligations.

Steve tries to help

Nicole, a NAB customer, phones her banker Steve, to tell him an email she sent to him has bounced back with a message stating it cannot be delivered. Steve believes the reason for this may have to do with the file type or size of the email attachment. To help her out, Steve gives Nicole his personal email address and asks her to send it there instead. Nicole resends the email to Steve's Gmail account. Steve responds to Nicole from his Gmail account to let her know he received her email and advise the next steps regarding her account.

By undertaking this action, Steve has breached the [Group Information Security Policy](#) which prohibits corresponding with customers from personal email accounts.

It is important to keep NAB information on the NAB network. Personal email accounts do not have the same security controls in place as the corporate network. Steve has jeopardised the security of Nicole's information by using his personal email account to correspond with her and received a warning and Conduct Gate as a result.

Inappropriate access using NAB's systems

Hugo stepped away from his computer briefly without locking it. When he returned to his desk he found Kate sitting at his desk entering in a loan application. Hugo didn't want to say anything as he was friends with Kate and didn't want to rock the boat.

It was later found that Kate was entering a loan application for herself and her employment was terminated.

Hugo's actions were also found to have breached the [Use of Information and Information Systems - Standard Operating Procedures](#) and the Code of Conduct as he is responsible for what happens using his login and did not escalate the issue appropriately. Hugo received a warning and Conduct Gate.

Inappropriate Banter Using Lync

Tiffany, John and Paul use Lync to communicate with each other at work throughout the day. During their communications they make offensive comments about sex, religion and race. They also make offensive comments about other employees, including their people leader, Tom, about his physical appearance, sexuality and work performance. Another employee, Helen, approached Tom and told him she saw part of a Lync message being typed by Paul which appeared to contain inappropriate language (swearing).

A review of Tiffany, John and Paul's Lync messages was undertaken. Their use of Lync was found to breach NAB's Use of Information and Information Systems - Standard Operating Procedure and Code of Conduct. Further, their inappropriate and offensive comments regarding physical appearance, sexuality and race breached NAB's Group Discrimination and Harassment Policy. All three employees were dismissed.

3. SOCIAL MEDIA

While we encourage you to make appropriate use of social media, you must act lawfully and be transparent, responsible and respectful of us, our customers, your colleagues and everyone you interact with online. Unless specifically authorised to do so, you must not post on social media as a representative of NAB. Be aware that even if you do not post on social media as a representative of NAB, your interactions on social media may affect NAB's reputation.

When using social media, you must:

- Read and comply with our [Social Media Guidelines](#) and NAB policies
- Ensure your personal use does not interfere with your work

Gareth vents on social media

Gareth was having a bad day and expressed his frustration with his customers on his Facebook page, making derogatory comments about how demanding they were and how nothing he did was good enough. One of his Facebook friends, also a NAB colleague, saw the comments and notified her people leader.

This action was not in line with our [Social Media Guidelines](#) and breached our Code of Conduct, resulting in Gareth receiving a Conduct Gate which impacted his participation in the relevant incentive plan.

Zara tries to help

NAB experienced a system error with our ATM network which resulted in negative publicity. Zara, who works at NAB, posted updates on Twitter about our progress in rectifying the error, and also posted on Twitter when the error was rectified.

Zara's Twitter posts were brought to NAB's attention. Although not intended to be harmful to NAB, the information on Twitter was NAB's confidential information, known only by Zara because of her employment with NAB. As such, the information should not have been posted on Twitter or disclosed outside of NAB. Also, Zara was not authorised by NAB to speak about such issues to the general public.

A Conduct Gate was applied. Zara was also reminded of the confidentiality obligations that apply to our people.

4. MEDIA DISCUSSIONS/PUBLICITY

You must not make public statements about NAB unless you are authorised to do so by our Corporate Communications team.

You are not permitted to allow external photographers to photograph the interior of NAB premises without approval from our Corporate Communications team.

You are expected to actively support your colleagues, our organisation's decisions and the communities we work with. You must not put your personal agenda ahead of our organisation and/or our customers.

Where you use Social Media, ensure your comments cannot be misconstrued as representing NAB's views unless you are specifically authorised to be making comments on behalf of NAB.

5. HONESTY AND INTEGRITY

You may have access to money, information, goods and documents belonging to us or our customers.

You must not steal, borrow, misappropriate or convert items to private use or access information without proper authority.

If you make any business related purchases, you must comply with the [National Australia Bank Ltd Expense Management Policy](#).

You must act with integrity in your dealings with colleagues and customers.

You must not conceal errors and omissions, or attempt to protect your colleagues who have breached our regulations. If you become aware, or suspect any inappropriate conduct or wrongdoing, you have a duty to report the concerns or seek guidance from:

- Your people leader or,
- Workplace Relations via the [People Advisory Centre](#) or,
- [Group Whistleblower Program](#) via the [FairCall Service](#).

NAB does not tolerate any reprisals, or threats of reprisals, against any employee who reports known or suspected misconduct. The Whistleblower Program provides support and protection to employees who report concerns to the Program.

Chloe amends NAB's systems

Chloe needed some extra funds to cover some unexpected expenses that came up at the end of the month. Chloe's account was in debit and she decided to use NAB's systems to put a temporary excess on her account as she knew without making the amendment on the system her name would show up on a report detailing the unauthorised excess. Chloe didn't think this would be an issue as she paid the amount back at the end of the month and her account was back in credit.

Chloe's actions were discovered as part of NAB's regular checks and her employment was terminated.

Jason is unwell

Jason, a call centre employee, telephoned to advise that he was sick and would not be at work for three days. On his return, he provided a medical certificate relating to his absence to his people leader, Heather, who noticed what appeared to be alterations to the dates on the certificate.

Heather made contact with Jason's treating doctor, who was unable to confirm the dates on the certificate presented. Jason later admitted to changing the dates on the certificate to avoid paying for an additional consultation.

Jason's actions in falsifying a medical certificate were dishonest and a breach of NAB's Code of Conduct. Jason's employment was terminated.

Aaron uses his corporate purchasing card for personal expenses

Aaron, an employee, used his corporate purchasing card to make personal low value purchases over the course of a month and in some instances deliberately miscoded the spend categories in Flexipurchase to mask the transactions.

Aaron's people leader, Sue, had delegated her approval to another team member who was not across the detail of Aaron's purchases and didn't query them.

As part of NAB's automated transaction analysis, Aaron's personal purchases were identified. Sue was informed of the personal nature of Aaron's transactions and the matter was referred to Workplace Relations and Financial Crime Services for further investigation.

The investigation determined Aaron had used his corporate purchasing card for personal items. Aaron's employment was terminated for breaching the Expense Management Policy.

Corporate Purchasing Card transactions will be subject to random audits. Cardholders and approvers may from time to time be asked to substantiate all purchases and demonstrate adherence to the [Expense Management Policy](#).

Pauline's expenses

Pauline, an Executive Assistant, used her corporate purchasing card to buy items including presents, flowers and other general items on behalf of her people leader, Sonya. Some of Pauline's colleagues noticed the purchases and questioned whether the expenses were appropriately authorised and in line with our Expense Management Policy.

An investigation was conducted and concluded that Pauline had breached the Expense Management Policy by purchasing non-permitted items. Further, Sonya, who had directed her to purchase such items, also breached the Policy.

Both Pauline and Sonya received a Conduct Gate, impacting their ability to participate in the relevant incentive plan. They were also required to read and acknowledge their understanding of and agree to comply with the [Expense Management Policy](#).

6. FAIRNESS

Fairness to our customers

You must treat all customers, existing and potential, fairly.

You must always ensure when dealing with customers that products, services and advice are provided in accordance with local laws and regulations. You should provide information in a way the customer will understand and in a manner that allows for an informed choice.

You must not make false, misleading or deceptive representations to induce a customer to enter a transaction or enter into a transaction without the customer's approval.

You must not use the confidential information of customers for the benefit of anyone else, including another customer, NAB or for yourself.

All dealings with customers must be fair and balanced and based on principles of fair dealing and good faith.

Customer complaints must be handled with sensitivity and in a timely manner. The [Customer Complaints Policy](#) provides guidance on effective and efficient complaints handling to meet the needs of both NAB and its customers.

Fair competition

You must never engage in collusive behaviour with our competitors. You must act in a way that ensures NAB competes freely and fairly, abiding by the laws and regulations which apply in all regions in which we operate.

7. PREVENTION OF FRAUD AND CORRUPTION

We are all responsible for the prevention of fraud and corruption.

Fraudulent or corrupt activity involves dishonest actions, or dishonestly failing to act, that cause actual or potential financial loss, or an unjust advantage. This includes:

- Theft of money, data or property
- Deliberately falsifying, concealing or destroying documents
- Acts of bribery

Products and services must not be made available if you become aware, or have reason to suspect, they will be used for criminal or illegal activity. If you suspect fraud or corrupt activity may be occurring, or you are pressured by a customer or colleague to depart from our policies/procedures, tell your people leader or report it through the [Group Whistleblower Program](#) via the [FairCall service](#).

Failure to report fraud or corruption may be regarded as seriously as the fraud itself.

Our Financial Crimes requirements provide guidance on our responsibilities and processes.

- Our [Anti-Fraud Policy](#) outlines our responsibility to act honestly and adhere to internal controls and procedures designed to prevent fraud activities.
- Our [Anti-Bribery and Corruption Policy](#) sets out the Group's approach and employee responsibilities for complying with applicable legal and regulatory requirements in relation to Bribery and Corruption.
- Our [Anti Money Laundering and Counter Terrorist Financing Policy](#) and [Economic and Trade Sanctions Policy](#) set out how the Group meets its legal and regulatory obligations in these areas.

All employees should remain alert to unusual customer activity and must follow correct procedures to ensure instances of fraud, corruption and bribery and the subsequent risks to NAB are minimised.

Olivia prevents fraud

While serving a customer at a suburban retail outlet, Olivia, a Banking Advisor, noticed that neither the signature nor the name provided by the customer matched those on the credit card handed to her. Olivia queried the anomaly with the customer; however, being dissatisfied with the response provided by the customer, she notified her people leader. An investigation subsequently revealed the customer held a number of accounts in different names to avoid taxation and to hide criminal activities.

Olivia acted in accordance with NAB policies and procedures by being fully alert to the risk of fraud. Her actions in preventing fraud were rewarded through her team's reward and recognition program.

Emma takes a shortcut

Emma is completing a loan for a customer. When putting the documents together Emma realises the customer did not sign a section of the consent form. Emma tries to contact the customer to arrange them to sign the document however she cannot reach them. Emma knows that by not having the form finalised the loan will be delayed. Not wanting to cause a problem for the customer, Emma scans the customer's signature from another document and pastes it into the form with the missing signature.

Whilst Emma was trying to ensure a good experience for the customer, she has created a false document. Emma's employment was terminated.

8. CONFLICTS OF INTEREST AND RELATIONS WITH CUSTOMERS AND/OR THIRD PARTY PROVIDERS

NAB's commercial interests and your personal interests must be managed so not to compromise your ability to make sound, objective business decisions. You must understand and comply with the [Conflicts of Interest Policy](#). You must also conduct business in a way that ensures customers are treated fairly and that you help safeguard market integrity.

Conflicts of interest

You must always exercise caution in your commercial and personal relationships with customers, colleagues, product providers and others to ensure they do not involve obligations that may prejudice or influence your business relationship or conflict with your duties.

Conflicted remuneration

If you advise on financial products or sell, refer with information or deal in life insurance products, you must ensure you do not accept a benefit in connection with that advice, sale, referral with information or dealing, that does not comply with NAB Group policies on remuneration and benefits. Consult with your people leader and the person responsible for your performance unit if unsure.

Participating in outside business interests and outside employment

If you participate in non-NAB business ventures or employment, speak with the person responsible for conflicts of interest management in your performance unit. If you are involved in voluntary activities, and you believe these activities may lead to a conflict of interest with your work, before you participate consult your people leader and the person responsible for conflicts of interest for your performance unit.

If you make important purchasing decisions for NAB and people close to you (e.g. partner, relative or friend) have an interest in, or are the actual suppliers of, the goods and services being purchased, you must advise your people leader or the person responsible for conflicts of interest in your performance unit.

Benefits, gifts and entertainment

You must exercise care in the giving and receiving of business-related benefits, gifts or entertainment to/from potential and existing customers and product providers and obtain approval from your people leader above specified threshold values.

You are responsible for identifying personal or business circumstances that may give rise to potential, actual or perceived Conflicts of Interest and for recording those details in the relevant [Conflicts of Interest Register](#).

Charitable donations

You must obtain approval for any donations, sponsorships or charitable contributions you accept from, or give to, a third party on behalf of NAB and record these appropriately.

Political donations

In line with our [Group Political Donations Policy](#) and [Political Contact & Communications Policy](#) NAB does not make donations or contribute funds to any political party, Parliamentarian, elected official or candidate for political office.

Employees may participate outside of work as an individual in the political process provided it is made clear they are not acting on behalf of or representing NAB.

Colin's interests conflict

Colin, a Banker, was also Treasurer of his local cricket club. At that time, the club was seeking to obtain a loan to build new clubrooms. Despite Colin's apprehension about the ability of the club to meet the loan commitments, he reluctantly approved the loan. Shortly after, the club experienced some liquidity problems and was unable to meet the loan repayments. Ultimately, this resulted in a large loss for NAB.

After a thorough investigation into the matter it was found that Colin had misused his position of responsibility, which constituted a conflict of interest and a breach of the Code of Conduct. Colin's employment was terminated.

All expenses paid

Jack, a Relationship Manager, accepted an all expenses paid trip offered by a customer, the value of which was likely to amount to several thousand dollars. Jack did not disclose the gift to his people leader, Ryan. On his return from the trip, Jack was approached by Ryan, who had been informed that the trip had been funded by a customer.

After a thorough investigation, Jack's employment was terminated. The acceptance of such a gift could be reasonably perceived as having the potential of unduly influencing Jack or creating a business obligation.

When you are offered, or wish to provide a gift you must discuss the details of the proposed gift with your people leader. Gifts of a determined value are required to be entered into the relevant [Conflicts of Interest Register](#).

Natalie's broking business

Natalie, a NAB Banker with responsibility for loan approvals, had a financial interest in an external broking business which introduced potential borrowers to financial institutions, including NAB.

On occasion, Natalie would refer customers to the broker company explaining their loan was more likely to be approved if the application was made through the broker. At other times, instead of suggesting the customer apply through the broker, she would simply note on their application the customers had been referred to NAB through the broker.

Natalie's people leader, Wendy, became aware of these practices and a full investigation was conducted. It was found Natalie's actions were a clear [conflict of interest](#) and a breach of the Code of Conduct resulting in the termination of her employment.

9. COMPLYING WITH LEGAL AND REGULATORY OBLIGATIONS, VOLUNTARY COMMITMENTS AND INTERNAL STANDARDS

You must comply with all laws, regulations and voluntary codes that are applicable to NAB, including laws, regulations and codes that are applicable to NAB as a financial services and credit provider and laws and regulations relating to competition. Failure to meet our legal and regulatory obligations can impact our credit and/or financial services licences and/or result in penalties. You must also comply with NAB's internal policies and processes, which often exceed standards expected by law, as they take into account our voluntary commitments which guide our approach to responsible business.

Our compliance procedures and training protect our customers, you and our organisation.

You must immediately report any suspected, potential or actual non-compliance to your people leader, divisional compliance team or the [Group Whistleblower Program](#) via the [FairCall Service](#).

Breaches may include:

- Not completing mandatory risk training by the due date
- Failing to complete and close out any audit issues assigned to you by the due date
- Failure to identify, record, escalate and manage events to reduce the risk of reoccurrence. This includes failure to complete remedial actions by the due dates
- Failure to log all conflicts of interest, gifts & entertainment and personal shares/securities trading as required and in line with policy and industry standards
- Non completion of assurance and declaration questionnaires in an honest and timely manner
- Acting outside your authorisations on behalf of NAB or your business unit, including Governance and Investment Committees of which you are a member
- Failure to report cash transactions of \$10,000 or greater or matters that you believe are suspicious or unusual
- Providing advice or recommendations to customers when you are not trained or authorised to do so
- Accepting a conflicted remuneration benefit
- Failure to give priority to the interests of the customer over your or NAB's interests

People leaders must ensure their employees are aware of, and have met, their compliance requirements. Any instances of non-compliance must be addressed in a timely manner. People leaders are reminded that their own Conduct Gate may be impacted where they do not appropriately manage a breach of the Code by one of their team members.

10. MARKET INFORMATION

You may obtain sensitive information about NAB or another company that is not generally known to others. The receipt of all confidential information by NAB must be carefully managed in order to comply with laws and policy. This includes storing the information so that only those who are required to use it may do so.

Confidential information must only be used for the purpose for which it is supplied and in accordance with law.

It is a criminal offence to trade stock market listed shares or other securities or debt instruments if you have information not publicly known that could affect the value of those shares or securities.

The Group Securities Trading Policy requires us to comply with the law and to be beyond reproach when:

- i. dealing with information relating to NAB and other entities we deal with, and
- ii. trading in NAB or other securities

This policy prohibits insider trading and includes blackout periods before half and full year results. During these periods you or your immediate family are not permitted to trade in NAB securities. It is your responsibility to be aware of blackout periods.

The Conflicts of Interest Policy also precludes the trading of non NAB securities when in possession of inside information.

Any allegation of misuse of confidential information, including inside information, will be thoroughly investigated by NAB. Schemes to avoid detection, such as passing the information to friends or relatives for them to undertake unlawful trading, will be discovered in such an investigation. Such offences can be found to be in breach of the Code of Conduct and could possibly lead to criminal charges.

William's inside information

William purchased shares in a company he knew would be the subject of a takeover. As a result of the takeover, it was expected the share price would increase rapidly and significantly. William knew this information because he worked with NAB.

Following the takeover, William sold his shares, making a healthy profit. Aware of the inappropriate nature of his activities, William also took steps to conceal his actions.

However, William's activities were identified by the Regulator and, following a thorough investigation, he was charged with offences under the Corporations Act relating to the use of inside information and consequently found guilty of the charges laid against him. William's employment was terminated, he was required to forfeit the benefits obtained and subsequently sentenced to a term of imprisonment.

11. CONFIDENTIALITY, ACCESS AND DISCLOSURE

You may have access to confidential information regarding customers, suppliers, your colleagues and our business affairs.

Your access and use of this confidential information is limited to work-related tasks. Access, use of, or disclosure for any other purpose is prohibited without proper authorisation, unless required by law.

Our internal systems must not be used to access your own personal customer profile or those of your family, friends, colleagues or public figures. Our standard customer channels must be used by you and your family and friends for banking arrangements.

Personal information is any information or opinion about individuals, including customers and contractors (whether true or not), whose identity is apparent or can reasonably be ascertained from that information or opinion. This information must only be viewed, collected, used, disclosed, updated, stored securely and destroyed in accordance with the *Privacy Act 1988* (Cth) [Privacy Act].

If you suspect that personal information is being misused, you must advise your people leader or report it through the [Group Whistleblower Program](#) via the [FairCall Service](#).

NAB has made certain commitments to our customers and others to protect their personal information. These commitments are set out in the NAB Privacy Policy and Privacy Notification. The [NAB Privacy and Data Protection Policy](#) applies to all employees of NAB and explains how employees must comply with privacy and data protection obligations

Emily shares information

Emily, a Banker who managed a portfolio of business customers, provided information to a customer about the deteriorating financial position of a competitor, in exchange for a financial benefit from the customer. NAB was notified of Emily's actions by an external business contact.

Emily's employment was terminated after an investigation found she had disclosed confidential information to unauthorised persons in return for a financial benefit.

A footy fanatic

Lachlan, a Customer Adviser with an interest in football would access the address details and account types of his favourite footballers and openly share the details with other staff. A colleague was concerned about Lachlan's actions and reported the behaviour to her people leader.

Lachlan's employment was terminated for accessing and disclosing the customers' personal and confidential information for non-work related purposes in breach of NAB's privacy obligations and our Code of Conduct.

Sam's inappropriate access

Sam, a Mobile Banker, was in a personal relationship with Sarah which ended badly. At the time of the relationship breakdown, Sarah owed Sam a large amount of money and it was agreed she would repay him an amount each week.

Sam was unhappy as Sarah stopped making payments due to having financial problems. Sam wasn't convinced Sarah was experiencing any financial problems and used NAB's systems to look at Sarah's accounts. Sam then called Sarah to demand that she make payment or he would commence legal proceedings against her.

Sarah raised a complaint about Sam's inappropriate access of her accounts. Sam's employment was terminated for breaching the Code of Conduct.

12. CONSEQUENCES OF BREACHING THE CODE OF CONDUCT

Our Code includes particular examples of misconduct identified by NAB; however, it does not cover every situation you may encounter while you work at NAB.

A relationship based on trust is important. All suspected breaches of our Code will be thoroughly investigated, by your people leader, supported by relevant specialist areas.

If these investigations reveal breaches, appropriate disciplinary and remedial action will be taken. This may range from providing training, coaching and counselling, impacting your performance review, through to reduction or loss of incentive payments to which you may be eligible, formal warnings or termination of employment. We will also comply with our obligations to notify the appropriate authorities where breaches of the law have been identified.

Any breach of the Code or our policies will be measured against the [Employee Conduct Management Policy](#).

The scenarios provided in the Code of Conduct are examples only. Each situation will be assessed in terms of the particular circumstances and facts. Appropriate action will be taken by NAB after consideration of all relevant details.

NATIONAL AUSTRALIA BANK LIMITED POLICY DECLARATION

I, _____

fully understand the standards of responsibility and ethical conduct outlined in the Code of Conduct and related policies which are expected of me when working on behalf of NAB.

I understand that my people leader or Workplace Relations via the People Advisory Centre are available to answer any queries I have and/or have satisfactorily addressed any queries that I have raised.

While I work at NAB, I will ensure that at all times I adhere to the standards and policies required by NAB.

I am fully aware that my employment may be reviewed and disciplinary action may be taken should I not adhere to these requirements.

Employee Number

Employee Name

Signed

Date

