



National Australia Bank Limited ABN 12 004 044 937

2019 Sustainability Data Pack

This Data Pack summarises our key non-financial performance information for financial year 2019. It accompanies our 2019 Sustainability Report and forms part of our Annual Reporting suite.

Data Contents

GRI Standards index

UNGP Human Rights index

Improper Land Acquisition

Key Information

Reporting period

The 2019 Sustainability Report and Data Pack have been prepared based on NAB's financial reporting year (1 October to 30 September), unless otherwise stated. Of note, environmental operational performance data is prepared based on NAB Group's environmental reporting year from 1 July to 30 June. The environmental reporting year aligns with regulatory reporting requirements in Australia geography, where the majority of NAB's GHG emissions currently occur.

Organisational boundary

Performance data and metrics are reported at a NAB Group level, unless otherwise stated. Information is presented on a continuing operations basis, with the exception of environmental operational performance data prepared based on NAB Group's environmental reporting year from 1 July to 30 June. Prior periods have data within the NAB Numbers tables have been restated for Customer, People and Community data to exclude discontinued operations. Workforce data refers to all NAB Group employees as at 30 September. Refer to Glossary on page 47 of the Sustainability Report for a definition of continuing operations and discontinued operations. NAB has used an operational control-based approach to establishing its organisational reporting boundary for environmental performance data. In Australia, with respect to the boundary for reporting of relevant Scope 1 and 2 GHG emissions, our organisational boundary meets the requirements of the National Greenhouse and Energy Reporting Act 2007 (Cth). In the UK, the organisational boundary for NAB's relevant Scope 1 and 2 GHG emissions meets the requirements of the Carbon Reduction Commitment Energy Efficiency Scheme (UK).

Geographic scope

Social Impact (SI) performance data has been reported for NAB Group's operations in Australia, New Zealand, the UK, Asia and the US, where data of a reasonable quality is available, or a reasonable estimate can be made, unless otherwise stated. SI performance data, including environmental performance data, currently excludes a small office in Canada, from which GHG emissions are considered to be immaterial.

Prior year statements

Where relevant, prior period figures have been restated when more accurate data becomes available or when there have been material changes to the methodologies for data calculation and estimation.

Baseline for 2020-2025 environmental performance targets

The baseline data for the NAB Group's 2020 environmental performance target and 2025 science-based emissions reduction target is the performance data from the 2015 environmental reporting year.

Forward-looking statements

The Sustainability Report and Data Pack contain certain forward-looking statements. The words 'anticipate', 'believe', 'expect', 'project', 'estimate', 'likely', 'intend', 'should', 'could', 'may', 'target', 'plan' and other similar expressions are intended to identify forward-looking statements. Indications of, and guidance on, future earnings and financial position and performance are also forward-looking statements. Such forward-looking statements are not guarantees of future performance and involve known and unknown risks, uncertainties and other factors, many of which are beyond the control of NAB, which may cause actual results to differ materially from those expressed or implied in such statements. There can be no assurance that actual outcomes will not differ materially from these statements.

Estimation

Where complete information is not available, estimates have been made by extrapolation from known activity data or by applying an uplift based on reconciliation between systems that collect activity data and NAB's financial reporting systems. Estimates are noted where relevant within the Sustainability Report and Data Pack. Across the NAB Group, where there is evidence that a proportion of activity data relevant to the calculation of a GHG emissions source is generated outside corporate systems, an uplift factor is applied to account for this additional business activity. This is to ensure that we do not underestimate our GHG emissions. The uplift factor is calculated based on a reconciliation of activity data in corporate systems compared to another data source e.g. expenditure data. Uplift factors have been applied to data from Australia, New Zealand and the UK.

Reporting of GHG emissions

All GHG emissions figures reported as part of the NAB Group's environmental performance are in tonnes of carbon dioxide equivalents (tCO₂-e) and include the main GHGs covered in the Kyoto Protocol – carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O), perfluorocarbons (PFCs) and hydrofluorocarbons (HFCs), as relevant. The NAB Group does not have emissions of sulphur hexafluoride (SF₆). Our Environmental Reporting and Offset Management Policy sets out the decision framework we have used to establish which Scope 3 GHG emissions are included in our carbon inventory.

Further information on the methodologies and approaches used by NAB Group to prepare its environmental performance data, particularly energy and greenhouse gas data, is available on our website here: <https://www.nab.com.au/about-us/corporate-responsibility/environment/climate-change>

CUSTOMER

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Performance metric	Spreadsheet tab
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Number of ATMs	General
Online usage	General
Customer complaints	General
Substantiated complaints received concerning breaches of customer privacy	General
Number of critical and high priority technology incidents - Australia	General
Customer advocacy – Net Promoter Score (NPS) results	General
Financial inclusion metrics	Financial Health
Financial hardship assistance - Australia	Financial Health
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Project finance by region	Financing
Project finance deals by Equator Principles categories	Financing
Environmental finance by lending category	Financing
Socially responsible investment	SRI

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Performance metric	Spreadsheet tab
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Gender equality tables - 2020 female representation objectives	Workforce
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Permanent workforce age profile	Workforce
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Whistleblower disclosures	Culture
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High performer retention	Culture
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Long term injury frequency rate (LTIFR)	Culture
Absenteeism	Culture
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New Zealand basic salary female to male ratio (using local pay scale bands)	Remuneration
Performance-related compensation as a percentage of total compensation	Remuneration
Employees covered by collective bargaining agreements	Remuneration
No. consultations/negotiations with trade unions over organisational change	Remuneration
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Average training hours per employee	Training

COMMUNITY

Performance metric	Spreadsheet tab
Supply chain numbers	Supply Chain
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ENVIRONMENT

Performance metric	Spreadsheet tab
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GHG emissions by source	GHG Emissions
GHG emissions by region	GHG Emissions
GHG emissions by gas type	GHG Emissions
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Net energy use by region	Energy
Net energy consumption by fuel type	Energy
Other environmental performance indicators	Other
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Summary of emissions reduction and renewable energy opportunities	Other
Examples of energy efficient and renewable energy opportunities implemented	Other

CUSTOMER

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Performance metric	Spreadsheet tab
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Customers - numbers

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Customer information	2019	2018	2017	2016	2015
Number of customers (millions) ¹	9.0	8.9	9.4	9.3	DNR
Number of branches and business banking centres ²	892	911	977	1,017	1,044
Number of ATMs ³	1,601	3,328	3,491	3,472	3,518

1. Includes 'unique' Australian and New Zealand customers. Methodology to collect total number of customers was updated in 2018 with third party signatories removed from calculation - prior year numbers have not been restated.

2. Data represents 'points of presence' or physical locations of branches and business banking centres in our global network, to avoid double-counting branches and business banking centres at the same address.

3. Decrease in 2019 caused by redi and BOQ ATMs (-1,750) no longer being part of the NAB ATM fleet. Prior year numbers have not been restated.

Online usage ¹	2019	2018	2017	2016	2015
Australia					
% of registered internet banking customers that are active users	68%	75%	74%	73%	74%
New Zealand					
% of registered internet banking customers that are active users	68%	67%	66%	65%	DNR

1. 'Active' refers to logging in over the preceding 30 days from September 30 reporting date.

Customer complaints	2019	2018	2017	2016	2015
Total number of customer complaints - Australia	216,036	226,160	212,081	196,597	180,481
Total number of customer complaints - New Zealand	10,678	10,536	12,930	15,769	17,250
Total customer complaints	226,714	236,696	225,011	212,366	197,731
Total number of complaints referred by customers to ombudsmen/external dispute resolution bodies - Australia ¹	4,233	2,690	2,403	2,437	2,476
Total number of complaints referred by customers to ombudsmen/external dispute resolution bodies - New Zealand	14	16	14	59	81
Total complaints referred by customers to ombudsmen/external dispute resolution bodies	4,247	2,706	2,417	2,496	2,557
Total number of complaints referred to the OAIC - Australia ²	9	16	15	14	11
Total number of complaints referred to Privacy Commissioner - New Zealand	-	4	-	1	4
Total number of complaints referred to OAIC/Privacy Commissioner	9	20	15	15	15

1. These complaints are those received via the Australian Financial Complaints Authority (AFCA).

2. Office of the Australian Information Commissioner (OAIC).

Substantiated complaints received concerning breaches of customer privacy ¹	2019
From the OAIC - Australia	9
From the Privacy Commissioner - New Zealand	-
From ombudsmen/external dispute resolution bodies - Australia	160
From ombudsmen/external dispute resolution bodies - New Zealand	-
Total number of substantiated complaints received concerning breaches of customer privacy from regulatory bodies and other outside parties	169

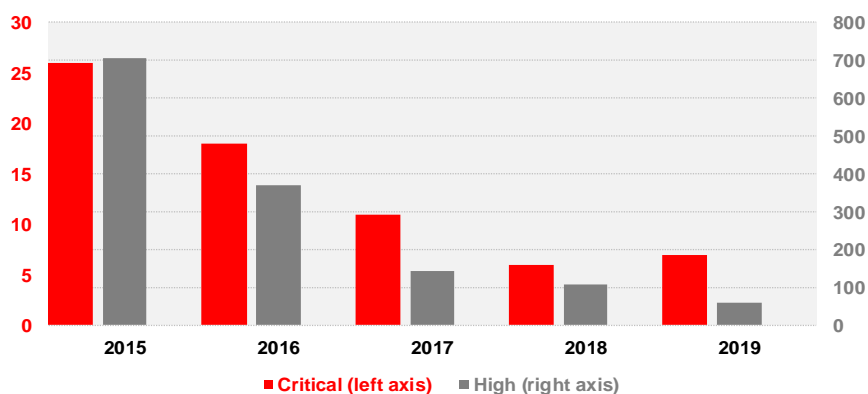
1. A substantiated complaint is a written statement by regulatory or similar official body addressed to the organization that identifies breaches of customer privacy, or a complaint lodged with the organization that has been recognized as legitimate by the organization (as defined in GRI Sustainability Reporting Standards 418 Customer Privacy, relating to GRI disclosure 418-1).

Number of critical and high priority technology incidents - Australia

Type ¹	2019	2018	2017	2016	2015
Critical (left axis)	7	6	11	18	26
High (right axis)	59	109	143	370	705

1. Critical priority incidents: significant impact or outages to customer facing service or payment channels. High priority incidents: functionality impact to customer facing service or impact/outage to internal systems.

NUMBER OF CRITICAL AND HIGH PRIORITY TECHNOLOGY INCIDENTS



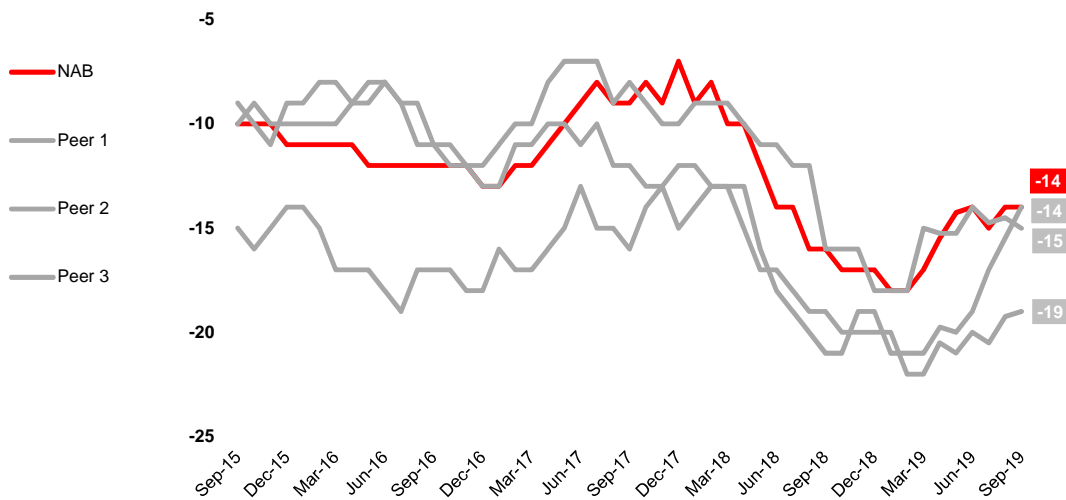
Customer advocacy – Net Promoter Score results

NPS score	2019	2018	2017	2016	2015
Australia					
Home Owners (HL@bank)	-13	-17	-11	-14	-5
Investors	-20	-19	-12	-11	-9
Small Business (\$0.1m-<\$5m)	-15	-21	-16	-16	-20
Medium Business (\$5m-<\$50m)	-8	-5	3	-8	-7
Priority segments NPS¹	-14	-16	-9	-12	-10
New Zealand²					
Starters and Savers (previously Future Value)	32	19	16	24	23
Home Owners	23	26	35	23	20
Investors including High Net Worth	24	29	18	16	14
SME	-6	-4	-2	0	-3

1. Net Promoter® and NPS® are registered trademarks and Net Promoter Score and Net Promoter Systems are trademarks of Bain & Company, Satmetrix Systems and Fred Reichheld. Priority Segments Net Promoter Score (NPS) is a simple average of the NPS scores of four priority segments: NAB defined Home Owners (HL@bank) and Investors, as well as Small Business (\$0.1m-<\$5m) and Medium Business (\$5m-<\$50m). The Priority Segments NPS data is based on six month moving averages from DBM Atlas & BFSM Research. Roy Morgan Research no longer provide Home Owners and Investors segment data - history has been restated.

2. Source: 1) Camorra Retail Market Monitor 1 October 2018 – 30 September 2019; 2) For SME segment, Kantar Business Finance Monitor Oct-Dec 2018 - July-Sept 2019. BNZ has moved to reporting strategic NPS on a 12 month rolling average for priority segments. For SME, BNZ reports strategic NPS on a 4 quarter rolling average. SME refers to businesses with an annual turnover of <\$20M.

2019 PRIORITY SEGMENT NPS - AUSTRALIA



Financial inclusion by product type and region (Australia and New Zealand)

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Financial inclusion	2019	2018	2017	2016	2015
Australia^{1,2}					
Number of Australians assisted with microfinance products/services	71,817	71,032	64,129	55,567	58,343
Number of microfinance loans written	34,215	31,743	26,776	22,886	23,475
Value of microfinance loans written (\$m)	38.4	34.6	28.6	25.6	28.3
Number of microfinance loans written since inception	242,792	208,578	176,835	150,059	127,173
Value of microfinance loans written since inception (\$m)	293.6	255.3	220.6	192.0	166.4
Value of AddsUP accounts savings matched – cumulative (\$m)	1.6	1.6	1.5	1.2	0.9
Value of NILS loans provided – cumulative (\$m)	189.7	160.7	133.7	112.3	93.7
Value of StepUP loans provided – cumulative (\$m)	63.1	56.8	50.6	44.4	38.3
Value of Microenterprise loans provided – cumulative (\$m)	29.0	28.7	28.5	28.1	27.5
Number of AddsUP accounts matched – cumulative	3,210	3,204	3,017	2,446	1,750
Number of NILS loans provided – cumulative	211,534	182,540	153,750	129,417	108,821
Number of StepUP loans provided – cumulative	21,788	19,622	17,504	15,387	13,294
Number of Microenterprise loans provided – cumulative	1,940	1,913	1,884	1,854	1,818
New Zealand³					
Number of NILS loans provided – cumulative	868	525	307	88	42
Number of StepUP loans provided – cumulative	1,049	632	327	175	84
Total number of microfinance loans provided – cumulative	1,917	1,157	634	263	126
Total value of microfinance loans provided – cumulative (NZ\$m)	5.2	3.0	1.5	0.8	0.4

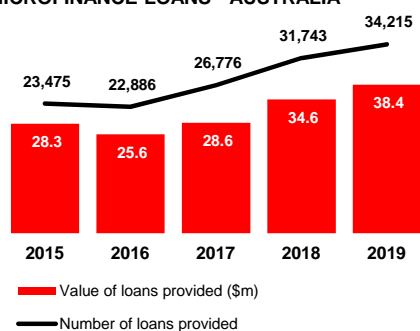
1. Calculation of total NILS loans provided is based on total debits against NILS accounts, divided by an average NILS value updated on a six-monthly basis. NAB and Good Shepherd are working to align reporting systems to provide up-to-date data on a monthly basis.

2. Totals include other loans issued through Community Development Finance Institutions and Speckle.

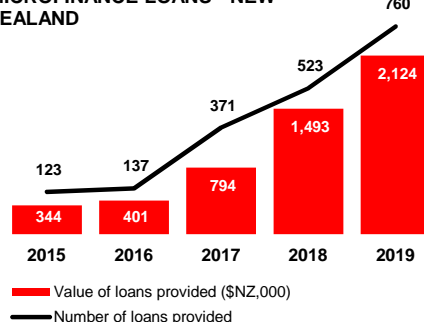
3. In partnership with Good Shepherd New Zealand, cumulative data since 2014.

Number and value (\$m) of microfinance loans provided - Australia	2019	2018	2017	2016	2015
Number of loans provided	34,215	31,743	26,776	22,886	23,475
Value of loans provided (\$m)	38.4	34.6	28.6	25.6	28.3

MICROFINANCE LOANS - AUSTRALIA



MICROFINANCE LOANS - NEW ZEALAND

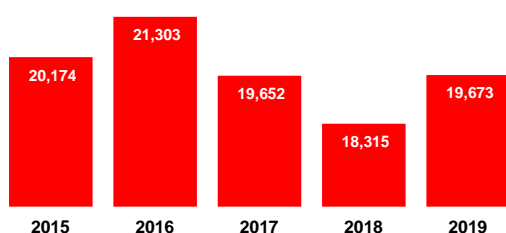


Number and value (\$m) of microfinance loans provided - New Zealand	2019	2018	2017	2016	2015
Number of loans provided	760	523	371	137	123
Value of loans provided (\$NZ,000)	2,124	1,493	794	401	344

Hardship assistance

Financial hardship assistance - Australia	2019	2018	2017	2016	2015
Australia					
Number of customers who received hardship assistance	19,673	18,315	19,652	21,303	20,174
Cure rate (percentage of customers with accounts back on track with repayments 30 days after receiving assistance)	90%	90%	90%	88%	86%
Cure rate (percentage of customers with accounts back on track with repayments 90 days after receiving assistance)	96%	97%	97%	93%	90%
New Zealand					
Number of customers who received hardship assistance	402	377	384	277	356

NUMBER OF CUSTOMERS PROVIDED FINANCIAL HARDSHIP ASSISTANCE - AUSTRALIA



Level 2 Regulatory Group¹ Exposure at Default (EaD) by Level 1 ANZSIC classification (\$m)²

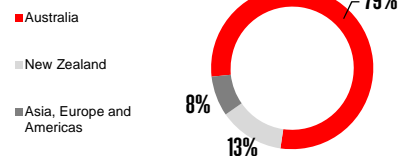
Industry	Net EaD			Gross EaD	
	2019	2018	2017	2016	2015
Accommodation, Cafes, Pubs and Restaurants	10,503	9,433	9,295	9,101	10,167
Agriculture Forestry, Fishing and Mining	56,310	51,824	49,204	50,115	51,706
Property and Business Services	24,172	21,328	19,355	18,396	19,072
Commercial Property	73,874	75,211	75,262	74,517	71,505
Construction	11,600	10,665	10,281	10,170	9,990
Finance and Insurance	112,000	106,897	106,340	236,803	268,401
Manufacturing	20,624	19,130	19,412	20,160	23,622
Personal	15,778	16,998	17,344	17,775	20,167
Residential Mortgage	388,315	387,072	378,162	362,872	395,775
Retail and Wholesale Trade	32,079	30,796	30,405	30,934	32,791
Transport and Storage	24,881	22,358	20,631	19,526	19,651
Other	92,920	85,532	81,273	77,375	83,818
Total	863,056	837,244	816,965	927,744	1,006,665

1. The Level 2 regulatory group comprises NAB and the entities it controls, excluding superannuation and funds management entities, insurance subsidiaries and securitisation special purpose vehicles to which assets have been transferred in accordance with the requirements for regulatory capital relief in APS 120 securitisation.

2. Prepared in accordance with NAB's methodology (based upon the 1993 ANZSIC codes) on a net EaD basis for 2017-2019, and on a gross EaD basis for 2015-2016.

Group Exposure at Default (EaD) by region (%)	2019
Australia	79%
New Zealand	13%
Asia, Europe and Americas	8%

GROUP EXPOSURE AT DEFAULT BY REGION (%)



Industries of interest

Resources Exposure at Default by type (\$bn) ¹	Sep 19	Mar 19	Sep 18	Mar 18
Oil & Gas Extraction	3.7	3.7	3.4	2.6
Mining Services	1.3	1.5	1.4	1.3
Other Mining	2.2	2.2	1.9	1.7
Iron Ore Mining	0.9	1.1	0.8	0.8
Thermal Coal Mining	0.8	0.9	0.4	0.5
Metallurgical Coal Mining	0.7	0.6	0.3	0.1
Gold Ore Mining	1.0	0.5	0.5	0.6
Total	10.6	10.5	8.7	7.6

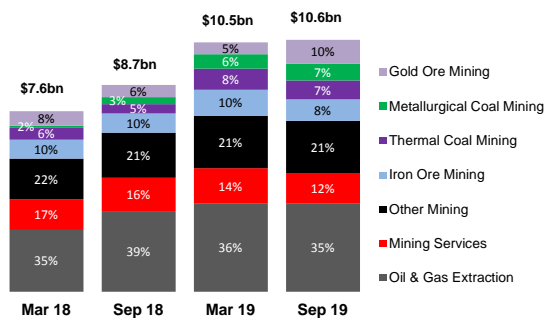
Resources Exposure at Default by type (%)	Sep 19	Mar 19	Sep 18	Mar 18
Oil & Gas Extraction ²	35%	36%	39%	35%
Mining Services	12%	14%	16%	17%
Other Mining	21%	21%	21%	22%
Iron Ore Mining	8%	10%	10%	10%
Thermal Coal Mining	7%	8%	5%	6%
Metallurgical Coal Mining	7%	6%	3%	2%
Gold Ore Mining ³	10%	5%	6%	8%
Total	100%	100%	100%	100%

1. Of the \$1.8bn increase in Resource EaD in March 2019 half, \$0.8bn relates to model and regulatory prescribed methodology requirements (includes: Thermal Coal +\$0.2bn, Metallurgical Coal +\$0.2bn), and \$0.8bn relates to Treasury related financial activity where NAB have qualifying securities. Actual lending activity (net loans and advances) to mining industry has been stable over the past two years.

2. Oil & Gas extraction exposure is largely to Liquefied Natural Gas projects and investment grade customers (69%).

3. September 2019 half year includes the impact of the introduction of standardised approach for measuring counterparty credit risk exposure (SA-CCR) of \$0.8bn, largely off-set by a reduced level of Treasury related financial activity.

RESOURCE EXPOSURE AT DEFAULT BY TYPE

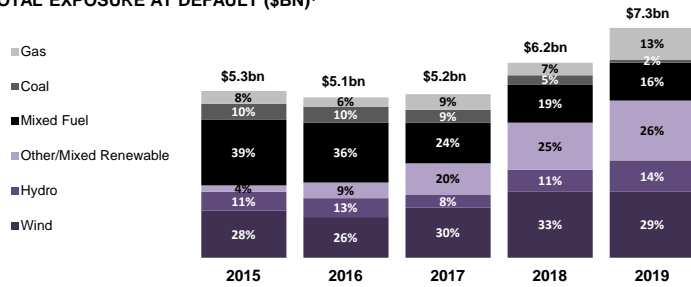


Electricity generation Exposure at Default by fuel source (\$bn) ¹	2019	2018	2017	2016	2015
Wind	2.1	2.1	1.6	1.3	1.5
Hydro	1.0	0.7	0.4	0.6	0.6
Other/Mixed Renewable	1.9	1.5	1.0	0.5	0.2
Mixed Fuel	1.2	1.2	1.3	1.9	2.1
Coal	0.1	0.3	0.4	0.5	0.5
Gas	1.0	0.4	0.5	0.3	0.4
Total	7.3	6.2	5.2	5.1	5.3

Electricity generation Exposure at Default by fuel source (%) ¹	2019	2018	2017	2016	2015
Wind	29%	33%	30%	26%	28%
Hydro	14%	11%	8%	13%	11%
Other/Mixed Renewable	26%	25%	20%	9%	4%
Mixed Fuel	16%	19%	24%	36%	39%
Coal	2%	5%	9%	10%	10%
Gas	13%	7%	9%	6%	8%
Total	100%	100%	100%	100%	100%

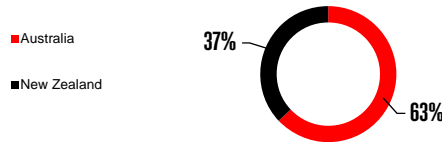
¹ Prepared in accordance with NAB's methodology (based upon the 1993 ANZSIC codes) at net EaD basis. Excludes exposure to counterparties predominantly involved in transmission and distribution. Vertically integrated retailers have been included and categorised as renewable where a large majority of their generation activities are sourced from renewable energy.

POWER GENERATION EXPOSURES BY FUEL SOURCE (%) AND TOTAL EXPOSURE AT DEFAULT (\$BN)¹



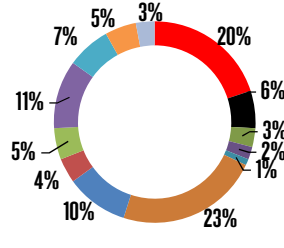
Group agricultural, forestry and fishing exposures by region (%)	2019
Australia	63%
New Zealand	37%

GROUP AGRICULTURAL, FORESTRY AND FISHING EXPOSURE AT DEFAULT (\$45.7BN) BY REGION (%)



Australian agricultural, forestry and fishing exposures by sector (%)	2019
Beef	20%
Sheep/Beef	6%
Sheep	3%
Other Livestock	2%
Poultry	1%
Mixed	23%
Services	10%
Forestry and fishing	4%
Dairy	5%
Grain	11%
Other crop and grain	7%
Cotton	5%
Vegetables	3%

AUSTRALIAN AGRICULTURAL, FORESTRY AND FISHING EXPOSURE AT DEFAULT (\$28.9BN) BY SECTOR (%)



Project finance by sector as a percentage of total portfolio value (expressed as EaD as at 30 September 2019)

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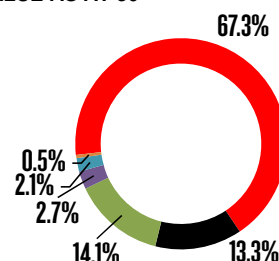
Sector	2019	2018	2017	2016	2015
Energy (renewable)	19	19	15	11	12
Energy (coal and gas-fired) ¹	6	5	6	6	7
Economic infrastructure	35	36	37	34	33
Social infrastructure	16	16	19	20	21
Water treatment infrastructure	3	4	4	5	7
Mining and refining (metals and coal) ¹	7	7	6	8	7
Oil and gas	11	11	10	12	11
Other	3	2	3	4	2

1. In 2019, coal-fired power is 0.2% and the remaining balance is gas-fired. Coal is 1.5% of mining and refining.

Project finance by region	2019
Australia and New Zealand	67.3%
United Kingdom	13.3%
North America	14.1%
Asia	2.7%
Europe	2.1%
South America	0.5%

PROJECT FINANCE BY REGION AS A % OF TOTAL PORTFOLIO VALUE AS AT 30 SEPTEMBER 2019

- Australia and New Zealand
- United Kingdom
- North America
- Asia
- Europe
- South America



Project finance deals by Equator Principles categories (as at 30 September 2019)

Equator principle category	Number of projects	Projects as a % of total portfolio value
A	5	8%
B	81	48%
C	23	16%
Pre-EP adoption (pre 2007)	8	4%
Project finance post EPs III to which EPs do not apply	43	24%

Environmental finance by lending category

Environmental finance category	Total ¹
Lending activity	
Lending for green commercial buildings This is financing for green commercial buildings. These buildings are within the top 15% NABERS energy efficiency rating and contribute towards the overall reduction in energy demand. Improving building performance is widely regarded as one of the most cost-effective opportunities to deliver energy and greenhouse gas emission reductions.	\$0.7bn
Specialised lending, corporate and securitisation finance for projects that reduce emissions and assist with climate change adaptation and lending to other low carbon businesses This lending includes large-scale renewable energy generation projects (e.g. wind and solar farms), finance for adaptation projects such as desalination and water recycling plants and water efficiency initiatives, and low emissions transport infrastructure. This category also includes finance for low carbon businesses such as renewable energy retailers, providers of solar and energy storage systems and solar installers.	\$7.2bn
Asset finance We provide finance for our customers to lease assets that improve energy efficiency or generate renewable energy.	\$0.3bn
Green term deposits Money deposited by customers into the UBank Green term deposits is allocated towards lending for projects and assets such as renewable energy, transport, low carbon buildings, energy efficiency and nature-based assets.	\$0.4bn
Debt market activity	
Green bonds The proceeds of green bonds issued and arranged by NAB are used for investments in renewable energy, low-carbon public transport, low-carbon buildings, energy efficiency and nature-based assets which are eligible under the Climate Bonds Taxonomy and contribute to the sustainable development goals.	\$4.8bn
Advisory activities, underwriting and arranging Advisory, underwriting and arranging activities are included in our environmental financing commitment when they are related to activities such as renewable energy, low-carbon public transport (e.g. electrified rail), energy efficiency, sustainable agriculture, sustainable water infrastructure and adaptation infrastructure.	\$4.1bn
Progress towards 2025 target of \$20 billion	\$17.5bn
Lending to support development of 6-Star Residential properties² This is cumulative lending flow (since 1 October 2015) for construction and significant renovations of homes that meet a minimum NatHERS 6-Star (or equivalent) standard. This supports the low carbon transition in a key segment of Australia's economy and assists in reducing residential energy demand and greenhouse emissions.	\$16.1bn
Progress towards 2025 target of \$35 billion	\$16.1bn
Progress towards aggregated 2025 target of \$55 billion	\$33.6bn

1. Represents total cumulative new flow of environmental financing from 1 October 2015. Further details on how we calculate our environmental financing numbers are available here:

<https://www.nab.com.au/about-us/social-impact/environment/climate-change>

2. Along with new home construction, this amount includes residential financing provided for activities where the identified loan purpose is 'Construction'. This typically includes major renovation activity in which the borrower undertakes a progressive drawdown of the loan amount. For major renovations, State building requirements for such construction activity generally require the overall home to meet a 6-star NatHERS rating (or equivalent).

Socially responsible investment

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Fund (\$m)	2019	2018	2017	2016
AMP Capital Investors Sustainable Future Australian Share Fund - Class A	0.15	0.23	0.39	0.60
AMP Capital Investors Responsible Investment Leaders International Share Fund - Class A	1.72	2.57	2.87	3.88
Australian Ethical Smaller Companies Trust Class B	11.17	9.89	9.73	6.67
Australian Ethical Larger Companies Trust - Class B	0.42	0.41	0.50	0.49
BT Ethical Share Fund	8.44	8.48	8.50	8.39
Hunter Hall Australian Value Trust - Class B Units	0.07	0.87	1.16	2.22
Hunter Hall Global Ethical Trust - Class B Units	5.97	6.45	6.90	9.91
Hunter Hall Value Growth Trust	12.52	14.60	20.16	48.39
Hunter Hall Global Deep Green Trust	1.06	0.01	0.01	0.01
Hunter Hall Global Value Share	-	-	3.20	0.14
Perpetual's Wholesale Ethical SRI Fund	408.88	491.05	499.58	447.43
Generation Wholesale Global Share Fund	35.37	35.97	35.10	19.95
Alphinity Wholesale Socially Responsible Share Fund	3.84	2.77	2.35	2.56
Australian Ethical Balanced Trust	-	-	1.21	1.28
Candriam Sustainable Global Equity	7.70	5.43	3.05	New
Russell Australian Responsible Investment ETF	-	-	0.29	New
Robeco Emerging Conservative Equity Fund	16.31	8.30	2.34	0.80
Legg Mason Martin Currie Ethical Values with Income Fund	2.98		New	New
Altius Sustainable Bond Fund	1.51		New	New
Total SRI Funds (\$m)	518	588	597	553
Total funds under management (\$m)	160,784	159,964	152,219	144,030
SRI funds as a percentage of total funds under management	0.32	0.37	0.39	0.38

PEOPLE

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Our workforce

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Full-time equivalent (FTE) employees ¹	2019	2018	2017
FTE (spot)	34,370	33,283	33,422
FTE (average)	33,950	33,747	33,746

¹ Includes all full-time employees, part-time, temporary, fixed term and casual employee equivalents, as well as agency temporary employees and external contractors either self-employed or employed by a third party agency. Note: This does not include consultants, IT professional services, outsourced service providers and non-executive directors.

Workforce by contract type and gender (headcount)	2019		2018		2017	
	Female	Male	Female	Male	Female	Male
Permanent full-time	12,803	15,915	12,609	15,108	12,816	14,894
Permanent part-time	4,158	662	4,610	634	5,143	681
Total permanent workforce	16,961	16,577	17,219	15,742	17,959	15,575
Fixed term full-time	206	303	174	235	162	212
Fixed term part-time	90	23	62	17	89	25
Casuals	733	287	740	239	790	275
External/temporary employees/contractors	3,337	6,831	3,240	6,735	2,896	6,407
Total workforce	21,327	24,021	21,435	22,968	21,896	22,494

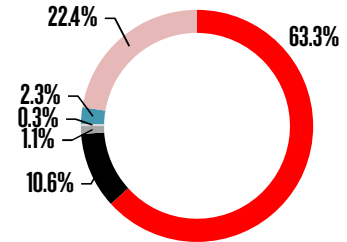
Workforce by contract type and gender (%) ¹	2019		2018		2017	
	Female	Male	Female	Male	Female	Male
Permanent full-time	28.1	34.8	28.0	34.0	29.0	34.0
Permanent part-time	9.3	1.5	10.0	1.0	12.0	2.0
Fixed term full-time	0.5	0.7	0.4	0.5	0.4	0.5
Fixed term part-time	0.2	0.1	0.1	0.0	0.2	0.1
Casuals	1.5	0.5	2.0	1.0	2.0	1.0
External/temporary employees/contractors	7.4	15.4	7.0	15.0	7.0	14.0

¹ Total percentages may not equal 100 due to rounding.

Employee distribution (%) by employment type	2019
Permanent full-time	63.3%
Permanent part-time	10.6%
Fixed term full-time	1.1%
Fixed term part-time	0.3%
Casual	2.3%
External (e.g. Contractor, Temp, Consultant)	22.4%

EMPLOYEE DISTRIBUTION (%) BY EMPLOYMENT TYPE

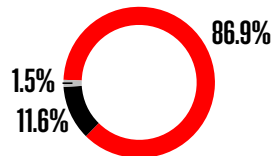
- Permanent full-time
- Permanent part-time
- Fixed term full-time
- Fixed term part-time
- Casual
- External (e.g. Contractor, Temp, Consultant)



Employee distribution (%) by geographic region	2019
Australia	86.9%
New Zealand	11.6%
UK, USA and Asia	1.5%

EMPLOYEE DISTRIBUTION (%) BY GEOGRAPHIC REGION

- Australia
- New Zealand
- UK, USA and Asia



Permanent workforce metrics

Gender equality table - 2020 female representation objectives

Measurable objective ¹	2017 actual	2018 actual	2019 actual	2019 target	2020 target
NAB Board (non-executive directors)	25%	33%	33%	-	40-60%
NAB Group Subsidiary Boards	39%	39%	39%	-	40%
Executive Management (Salary Groups 6 & 7)	31%	31%	33%	37%	40%
Senior Management (Salary Group 5)	30%	32%	34%	37%	40%
Management (Salary Group 4)	38%	38%	37%	-	40-60%
Non-management (Salary Groups 1 – 3)	59%	57%	55%	-	40-60%
Australian talent population ²	59%	41%	41%	50%	50%
Australian graduate program intake ³	56%	46%	46%	50%	50%
Total organisation	54%	52%	51%	-	40-60%

1. NAB's 2020 gender equality targets were set in FY17. '-' denotes no FY19 interim target was set. Calculated using population of permanent full-time and part-time employees. Actuals and targets are stated as at 30 September for each respective year.

2. The Australian Talent population includes employees who have been objectively assessed against evidence-based criteria, and selected by Divisional Leadership Teams as having upward potential.

3. As at 30 September 2019, 46% of the graduates who have accepted positions in NAB's 2020 Australian graduate program are female.

Permanent workforce by employment level and gender (%)	2019		2018		2017	
	Female	Male	Female	Male	Female	Male
Group 7 (Executive Leadership Team)	33	67	30	70	27	73
Group 6 (Executive General Managers)	33	67	31	69	31	69
Group 5 (Head of functions)	34	66	32	68	30	70
Group 4 (Managers)	37	63	38	62	38	62
Group 3 (Consultants/Junior management)	42	58	43	57	44	56
Group 2 (Analyst/Team Leader)	56	44	58	42	59	41
Group 1 (Team member/officer)	68	32	69	31	70	30
Total permanent workforce	51	49	52	48	54	46

Permanent workforce by tenure and gender (%)	2019		2018		2017	
	Female	Male	Female	Male	Female	Male
<1 year	7	8	6	8	5	6
1 year	5	7	4	5	5	5
2 - 3 years	7	7	8	8	9	8
4 - 5 years	6	6	6	5	6	5
6 - 10 years	11	9	12	11	13	11
11 - 15 years	7	6	7	6	7	5
16 - 20 years	4	3	4	3	4	2
21+ years	5	4	6	4	6	5

Permanent workforce by age and gender (%)	2019		2018		2017	
	Female	Male	Female	Male	Female	Male
<25	3	3	3	3	3	3
25 - 34	15	15	16	15	17	15
35 - 44	16	16	16	15	16	14
45 - 54	11	11	12	10	12	10
55+	5	5	6	4	6	4

Permanent workforce age profile	2019		2018		2017	
	Female	Male	Female	Male	Female	Male
Average age	40.2	39.7	40.2	39.5	40.2	39.6
% of workforce over 50	11	9	11	9	11	8

Employee engagement

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Aspect	2019	2018	2017
Employee engagement score ¹	54%	54%	59%
Response rate	80%	75%	83%
Inclusion index score ²	74%	72%	73%

1. Employee Engagement Survey conducted by Aon (now known as Kincentric). The engagement result indicates the percentage of employees at NAB that are strong advocates (SAY), demonstrate a commitment to the Bank (STAY) and exert discretionary effort (STRIVE). 2019 survey population excluded external contractors, consultants and temporary employees. Prior year results have not been restated.

2. Inclusion Index is an average score from four selected diversity and inclusion questions.

Conduct and whistleblowing - Australia

Code of conduct breaches	2019	2018	2017
Warning or counselling / remedial actions ¹	986	908	1,306
Resignation	168	193	134
Termination	124	114	173
Total number of breaches of Code of Conduct	1,278	1,215	1,613

1. 2017 amount included 343 breaches attributable to one particular issue regarding the incorrect completion of forms.

Whistleblower disclosures ¹	2019	2018	2017
No. of disclosures fully or partially substantiated (and closed)	29	37	26
No. of disclosures not substantiated	95	67	48
Open (as at reporting date)	31	19	13
No. of disclosures received under the Whistleblower Policy	155	123	87

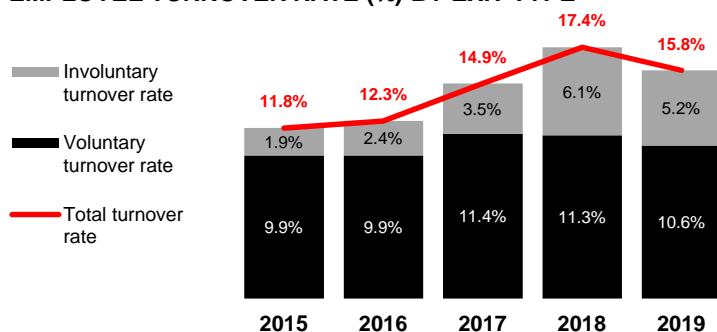
1. Number of disclosures received under the Whistleblower Policy, incorporating disclosures fully, partially or not substantiated, and disclosures still under review as at reporting date. Prior year numbers have not been restated.

Turnover and retention

Employee turnover rate ¹	2019	2018	2017	2016	2015
Voluntary turnover rate	10.6%	11.3%	11.4%	9.9%	9.9%
Involuntary turnover rate	5.2%	6.1%	3.5%	2.4%	1.9%
Total turnover rate	15.8%	17.4%	14.9%	12.3%	11.8%

1. Number of all employees who exited the bank each year (voluntarily, involuntarily, or total), as a percentage of the average permanent headcount for each respective year.

EMPLOYEE TURNOVER RATE (%) BY EXIT TYPE



Employee turnover rate by gender	2019		2018		2017	
	Female	Male	Female	Male	Female	Male
Voluntary turnover rate	10.5%	10.8%	11.3%	11.3%	11.1%	11.9%
Involuntary turnover rate	6.2%	4.1%	6.4%	5.6%	3.2%	3.8%
Total turnover rate	16.7%	14.9%	17.7%	16.9%	14.3%	15.7%

High performer retention ¹	2019	2018	2017	2016	2015
Australia					
Retention of high performing employees	93%	93%	92%	94%	95%
Voluntary turnover of high performing employees	6%	6%	7%	5%	5%
New Zealand					
Retention of high performing employees	89%	91%	94%	DNR	DNR
Voluntary turnover of high performing employees	10%	7%	5%	DNR	DNR

1. Refers to the percentage of total employees identified as 'high performers' in the previous performance year that remain employed at 30 September of the current performance year.

Parental leave - return to work rate (by gender) ¹	2019		2018		2017	
	Female	Male	Female	Male	Female	Male
Australia						
Total number of employees entitled to parental leave	14,727	14,672	14,882	13,663	15,532	13,458
Total number of employees who took parental leave	758	44	837	32	824	27
Total number of employees who returned to work after parental leave ended	628	39	687	30	711	20
Return to work rate (from primary carers leave, long service leave and parental leave)	83%	89%	82%	94%	86%	74%
Total number of employees who returned to work after parental leave ended who were still employed twelve months after their return to work	586	24	613	17	650	23
Total number of employees who returned to work after parental leave ended who were still employed two years after their return to work	535	12	552	16	604	3
New Zealand						
Total number of employees entitled to parental leave	2,363	1,811	2,309	1,807	DNR	DNR
Total number of employees who took parental leave	247	72	231	65	DNR	DNR
Total number of employees who returned to work after parental leave ended	221	70	200	63	DNR	DNR
Return to work rate (from primary carers leave, long service leave and parental leave)	90%	97%	87%	97%	DNR	DNR
Total number of employees who returned to work after parental leave ended who were still employed twelve months after their return to work	185	54	208	51	DNR	DNR
Total number of employees who returned to work after parental leave ended who were still employed two years after their return to work	154	35	152	40	DNR	DNR

1. Return to work rate measures the percentage of employees who have returned to work and remained an employee for 30 days (in relevant reporting year) after taking primary carers leave, long service leave and/or parental leave.

Health, safety and wellbeing

LTIFR ¹	2019	2018	2017	2016	2015
Australia	0.49	0.75	0.65	0.98	1.24
New Zealand ²	1.11	0.24	1.66	1.09	1.48

Absenteeism ³	2019	2018	2017	2016	2015
Australia	8.59	8.28	8.37	7.91	7.46
New Zealand	6.57	6.29	6.61	7.17	6.51

Total days lost due to work-related stress

Australia	3,654	3,958	4,116	5,380	4,530
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1. Lost time injuries are defined as a workplace injury resulting in an employee being absent from work for at least one full shift, and for which the employee receives workers compensation. $LTIFR = \text{Lost time injuries} \times 1,000,000 \text{ hours worked} \div (\text{average annual full-time equivalent employees} \times 40\text{-hour working week} \times 46 \text{ weeks per year})$. From 2018, a 37.5-hour working week is used in the calculation for New Zealand. Past results may have been revised upwards due to additional lost time injuries being recorded after the reporting period has ended. Current year results may also be revised as additional lost time injuries are recorded in our system. Any updates will be reflected in future reporting.

2. In line with local reporting requirements, New Zealand LTIFR calculation in 2018 used population of employees who were absent for 5 or more days. This was changed in 2019 to be the same as Australia, as defined in footnote 1. Prior year rate has not been restated.

3. Absenteeism represents the total number of unscheduled absence days during the period divided by the average number of full time equivalent employees (excluding casual employees). Past results may have been revised upwards due to additional absences being recorded after the reporting period has ended. Current year results may also be revised as additional absences are recorded in our system. Any updates will be reflected in future reporting.

Remuneration, compensation and employee relations

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Basic salary female to male ratio (by location)	2019	2018	2017
Australia			
Group 7 (Executive Leadership Team)	0.75	0.60	0.69
Group 6 (Executive General Managers)	0.96	0.92	0.91
Group 5 (Head of functions)	0.92	0.94	0.94
Group 4 (Managers)	0.97	0.96	0.96
Group 3 (Consultants/Junior management)	0.96	0.96	0.97
Group 2 (Analyst/Team Leader)	1.01	1.01	1.01
Group 1 (Team member/officer)	1.01	1.01	1.00
Asia			
Group 7 (Executive Leadership Team)	N/A	N/A	N/A
Group 6 (Executive General Managers)	N/A	N/A	N/A
Group 5 (Head of functions)	1.07	1.12	1.06
Group 4 (Managers)	0.85	0.88	0.88
Group 3 (Consultants/Junior management)	0.87	0.96	1.04
Group 2 (Analyst/Team Leader)	1.01	1.05	1.05
Group 1 (Team member/officer)	N/A	0.66	1.17
United Kingdom			
Group 7 (Executive Leadership Team)	N/A	N/A	N/A
Group 6 (Executive General Managers)	N/A	N/A	N/A
Group 5 (Head of functions)	1.05	1.03	0.87
Group 4 (Managers)	0.86	0.92	0.90
Group 3 (Consultants/Junior management)	0.92	0.96	0.86
Group 2 (Analyst/Team Leader)	0.77	1.06	0.81
Group 1 (Team member/officer)	N/A	N/A	N/A
United States of America			
Group 7 (Executive Leadership Team)	N/A	N/A	N/A
Group 6 (Executive General Managers)	N/A	N/A	N/A
Group 5 (Head of functions)	0.83	1.02	0.93
Group 4 (Managers)	0.88	0.78	0.74
Group 3 (Consultants/Junior management)	1.00	1.04	1.10
Group 2 (Analyst/Team Leader)	0.95	0.96	0.94
Group 1 (Team member/officer)	N/A	N/A	N/A
New Zealand¹			
Group 7 (Executive Leadership Team)	N/A	N/A	N/A
Group 6 (Executive General Managers)	0.92	1.13	1.22
Group 5 (Head of functions)	0.96	1.07	1.01
Group 4 (Managers)	0.93	0.96	0.94
Group 3 (Consultants/Junior management)	0.93	0.99	0.94
Group 2 (Analyst/Team Leader)	0.95	0.98	0.95
Group 1 (Team member/officer)	0.97	1.14	1.00

1. BNZ has 11 pay scale bands as opposed to the 7 used in the NAB Group. This reflects a different operating model and local market conditions. The 11 pay scale bands have been mapped and aggregated to the NAB Group reporting format above, consistent with prior year methodology but without reflecting recent organisational changes at BNZ. Refer to table below for 2019 ratios (and forecast of 2020 ratios) following recent organisational changes at BNZ, using refreshed local pay scale bands.

New Zealand basic salary female to male ratio, using local pay scale bands ^{1, 2}	2019	2020 forecast
New Zealand - local pay scale bands (lowest to highest paid)		
Band 12	1.00	1.01
Band 13	0.99	1.00
Band 13.5	1.00	1.00
Band 14	0.98	1.00
Band 15	0.95	0.97
Band 16	0.94	0.95
Band 17	0.97	0.99
Band 18	0.95	0.99
Band 19	0.92	0.97
Band 20	0.92	0.92
Band 21	0.94	1.02

1. While non-financial metric "Ratio of basic salary, female to male (by employment level)" is part of the scope of Ernst & Young's (EY) limited assurance over the 2019 Sustainability Report and Data Pack, the figures stated in this table have not been subject to assurance by EY.

2. Progress has been made to improve gender pay parity according to the local pay scale. These changes improve team structures and pay equity, with the more significant benefits to pay equity expected to be realised next year.

Performance-related compensation as a percentage of total compensation	2019	2018	2017
Group 7 (Executive Leadership Team)	47	41	52
Group 6 (Executive General Managers)	37	36	43
Group 5 (Head of functions)	27	30	31
Group 4 (Managers)	19	18	21
Group 3 (Consultants/Junior management)	10	10	12
Group 2 (Analyst/Team Leader)	6	5	7
Group 1 (Team member/officer)	3	2	3

Employee relations

Employee relations	2019	2018	2017	2016	2015
Employees covered by collective bargaining agreements					
Australia	100%	100%	100%	100%	100%
New Zealand	6%	7%	8%	10%	10%
Number of consultations/negotiations with trade unions over organisational change (restructures outsourcing, etc.)					
Australia	70	175	149	264	225

Employment pathways and development programs

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Employment pathways	2019	2018	2017	2016	2015
Indigenous employment¹					
School-based trainees	88	75	56	51	44
Full-time trainees	2	9	19	19	24
Interns	10	9	11	18	12
Central recruitment	-	-	1	3	16
Trainees graduating to permanent employment	26	24	20	35	18
African-Australian Inclusion program					
Number of female participants	36	44	11	38	8
Number of male participants	47	38	21	47	15
Cumulative number of female participants	204	168	124	113	75
Cumulative number of male participants	261	214	176	155	108
Total cumulative number of participants	465	382	300	268	183

1. Numbers in table show how many Indigenous Australian trainees were employed in relevant year, as part of NAB's Indigenous employment programs. 76 new traineeships were offered in 2019, against a target of 70.

Welcome to NAB and Job Ready ¹ - number of participants	2019	2018	2017
Welcome to NAB	2,334	2,108	DNR
Job Ready	1,230	1,949	DNR

Leadership programs - number of participants	2019	2018	2017
Breakthrough ²	500	522	DNR
Leadership Ready ³	2,546	2,850	DNR

1. Welcome to NAB: a full day experiential face to face event designed for all new starters as an introduction to NAB. Job Ready programs: specialised induction training of new employees.

2. The Breakthrough@NAB learning series aims to empower and enable female NAB employees to maximise their potential and work through any barriers that may exist in the workplace.

3. These are programs provided to leaders taking on their first leadership role and subsequently as they move through each leadership transition.

Capability and training

Capability and training - Australia (by level) ¹	2019		2018		2017	
	Female	Male	Female	Male	Female	Male
Average training hours per employee by level						
Group 7 (Executive Leadership Team)	3	11	5	4	9	4
Group 6 (Executive General Managers)	10	11	8	9	15	21
Group 5 (Head of functions)	15	13	14	16	27	40
Group 4 (Managers)	10	11	16	20	27	41
Group 3 (Consultants/Junior management)	14	13	25	25	42	44
Group 2 (Analyst/Team Leader)	16	18	35	36	55	56
Group 1 (Team member/officer)	22	40	33	63	49	74
Total average training hours per employee	17		31		44	

Capability and training - New Zealand (by level) ²	2019		2018	
	Female	Male	Female	Male
Average training hours per employee by level				
Group 7 (Executive Leadership Team)	15	n/a	10	2
Group 6 (Executive General Managers)	20	17	7	7
Group 5 (Head of functions)	24	30	7	7
Group 4 (Managers)	18	27	8	7
Group 3 (Consultants/Junior management)	23	25	51	51
Group 2 (Analyst/Team Leader)	32	31	10	6
Group 1 (Team member/officer)	23	32	11	9
Total average training hours per employee	27		22	

Total number of training hours provided	2019	2018	2017
Australia ¹	507,106	873,580	1,338,529
New Zealand ²	130,781	114,900	129,547
Total	637,887	988,480	1,468,076

1. Formal training and development hours captured in our Learning Management System (LMS) and provided to our Australian (permanent, fixed term and casual) employees. The decrease in hours in 2019 is mainly because our LMS does not as yet capture modes of learning that have become more widely used by NAB employees, like business-specific training, self-directed learning and digital learning through external providers or other channels (e.g. NAB Workplace and LinkedIn Learning). Efforts are being made to capture these types of learning in next year's reporting of training hours.

2. New Zealand data represents enterprise-wide learning and not learning that has been self-directed.

COMMUNITY

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Supply chain numbers

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Supply chain	2019	2018	2017	2016	2015
Spend on all suppliers (\$m)	4,714	4,429	4,198	4,167	5,836
Number of contracted suppliers	1,830	1,820	1,841	1,761	1,746
Number of material suppliers	74	58	50	56	94
Number of supply contracts entered into in the reporting period	936	784	764	682	482
Number of diverse suppliers ¹ engaged	57	29	41	68	15
Spend with diverse suppliers	2,786,456	690,384	723,600	895,625	221,547
Percentage of material suppliers ² that are signatories to the GSSPs	88%	88%	90%	91%	47%
Percentage of ESG risk assessments completed for new/recontracted high ESG risk sensitive sector suppliers ³	100%	100%	100%	33%	N/A

1. 'Diverse Suppliers' describes NAB's purchases made with Indigenous-owned, minority-owned and women-owned businesses and disability and social enterprises.

2. A material supplier, as defined in accordance with APRA Prudential Standard CPS 231 or regional equivalent, performs an outsourcing activity that has the potential, if disrupted, to have a significant impact on NAB Group's business operations or its ability to manage risks effectively.

3. The 2018/2017 data aligns to the 2020 supply chain target "100% of new/re-contracted suppliers in sensitive sectors assessed for ESG Risks each year." This metric applies to Australia and BNZ for Tier 1 contracts and excludes evergreen contracts.

Corporate Community Investment (CCI)

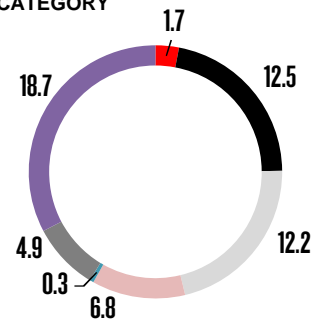
Home

Community investment (\$m) by category	2019	2018	2017	2016	2015
Cash contributions					
Charitable gifts and donations	1.7	1.8	1.7	1.8	2.2
Community investments	12.5	18.1	9.7	10.1	10.7
Commercial initiatives	12.2	10.5	8.8	8.5	8.5
Total cash contributions	26.4	30.4	20.2	20.4	21.4
In-kind contributions					
In-kind volunteering	6.8	6.8	6.4	8.9	9.9
In-kind support	0.3	0.3	0.3	0.1	0.2
Total in-kind contributions	7.1	7.1	6.7	9.0	10.1
Management costs					
Total CCI (excluding foregone fee revenue)	38.4	41.6	30.0	34.0	36.0
Total CCI (excluding foregone fee revenue) % of pre-tax profit	0.53%	0.51%	0.32%	0.37%	0.40%
Foregone fee revenue					
Total CCI	57.1	54.4	44.6	48.8	54.4
Total CCI % of pre-tax profit	0.78%	0.66%	0.47%	0.53%	0.61%

Community investment (\$m) by category	2019
Charitable gifts and donations	1.7
Community investments	12.5
Commercial initiatives	12.2
In-kind volunteering	6.8
In-kind support	0.3
Management costs	4.9
Foregone fee revenue	18.7
Total CCI	57.1

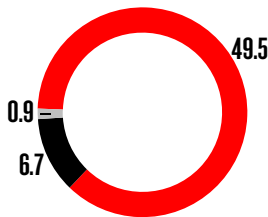
COMMUNITY INVESTMENT (\$M) BY CATEGORY

- Charitable gifts and donations
- Community investments
- Commercial initiatives
- In-kind volunteering
- In-kind support
- Management costs
- Foregone fee revenue



COMMUNITY INVESTMENT (\$M) BY REGION

- Australia
- New Zealand
- USA, UK and Asia



Community investment (\$m) by region	2019	2018	2017	2016	2015
Australia	49.5	46.7	36.1	40.1	45.9
New Zealand	6.7	6.9	8.1	8.3	8.3
USA, UK and Asia	0.9	0.8	0.4	0.4	0.2

Breakdown of investment (%) by focus area ¹	2019	2018	2017	2016	2015
Arts and culture	1	1	1	2	2
Disadvantage/social welfare	39	51	35	33	12
Education and young people	5	2	2	6	28
Emergency relief	1	1	3	1	3
Enterprise and economic development	4	3	5	11	4
Environment and bio-diversity	3	2	2	1	2
Health and medical research	1	4	6	6	6
Sport	38	31	40	33	32
Other issues	8	5	6	8	11

1. Calculation based on 'cash contributions' as other areas (e.g. volunteering) are difficult to classify towards a certain focus area.

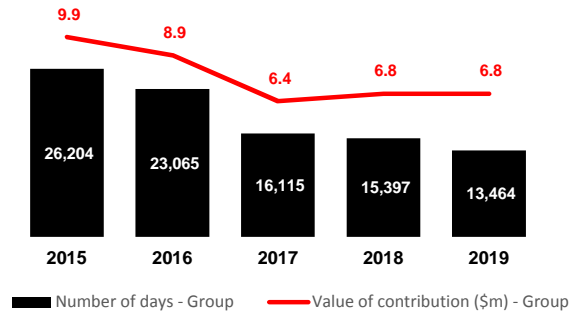
Volunteering

Volunteering	2019	2018	2017	2016	2015
Number of days - Group	13,464	15,397	16,115	23,065	26,204
Value of contribution (\$m) - Group	6.8	6.8	6.4	8.9	9.9
Australia					
% of employees who took volunteer leave ²	27%	29%	28%	39%	43%
Number of volunteers	7,550	8,150	8,129	DNR	DNR
Number of general volunteer days	9,424	10,399	10,408	15,753	15,744
Number of skilled volunteer days	1,223	739	999	2,065	2,074

1. Value of volunteering days, calculated using average daily salaries by employment level, contributed by NAB employees to charitable organisations in Australia, New Zealand and - through our global branch network - in London, New York and parts of Asia.

2. Calculated as total number of employees who took any amount of volunteer leave divided by total number of employees as at 30 September.

VOLUNTEERING DAYS AND IN-KIND \$ VALUE¹



ENVIRONMENT

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Performance metric	Spreadsheet tab
Environmental Statement of Position for the Group data	Position
Environmental performance targets	Position
Gross greenhouse gas emissions by activity	GHG Emissions
GHG emissions by source	GHG Emissions
GHG emissions by region	GHG Emissions
GHG emissions by gas type	GHG Emissions
Offset portfolio by project type for actual GHG emissions	GHG Emissions
Direct and indirect energy consumption and production	Energy
Net energy use by region	Energy
Net energy consumption by fuel type	Energy
Other environmental performance indicators	Other
Paper purchased by geography	Other
Summary of emissions reduction and renewable energy opportunities	Other
Examples of energy efficient and renewable energy opportunities implemented	Other

Environmental Statement of Position for the Group data¹

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Indicator ²	Units	2019	2018	2017	2016	2015
Employee numbers ³	FTE	33,867	33,827	34,167	44,054	43,203
Property space occupied	m ²	722,497	747,751	758,449	1,007,087	1,031,640
Total operating expense ⁴	\$m	(9,013)	(8,992)	(7,635)	(7,438)	(9,899)
Underlying profit ⁵	\$m	8,208	8,985	10,260	9,995	9,399
Water use (estimate) ⁶	kL	391,050	387,598	400,655	492,153	616,295
Waste to landfill (estimate) ⁶	tonnes	1,871	1,948	2,305	2,419	2,850
A3 & A4 office paper purchased	tonnes	511	574	716	966	1,156
Net energy consumption	GJ	695,678	725,527	752,397	864,481	1,083,881
Gross GHG emissions (Scope 1, 2 and 3) prior to renewable energy purchase	tCO ₂ -e	171,535	181,316	187,425	232,100	276,584

1. Environmental reporting year runs from 1 July – 30 June, in line with the National Greenhouse and Energy Reporting Act 2007 (Cth).

2. KPMG has provided assurance on specified GHG emissions and offset data presented in this Data Pack and 2019 Sustainability Report. Visit our website for more information: <https://www.nab.com.au/about-us/social-impact/shareholders/environmental-performance>

3. The values shown for 'Employee numbers' and 'Property space occupied' shown in the Environmental Statement of Position for the Group (and elsewhere in this document and the Sustainability Report) represent an annual average of FTE and m² respectively across the period from 1 July to 30 June each year.

4. 'Total operating expense' and 'Underlying profit' correspond to NAB's financial year, ending 30 September. Prior period financial and environmental information has not been restated to exclude discontinued operations. Please refer to note 37 in NAB's 2019 Annual Financial Report for further information on discontinued operations.

5. Use of Underlying Profit as a metric (rather than measures of profit or economic activity) for normalisation of our environmental performance data allows for meaningful comparison to prior years' data and to financial intensity measures used in our CDP disclosures due to the nature of our underlying business activities. Please refer to page 3 of NAB's 2019 Full Year Results Announcement (available at www.nab.com.au) for a more detailed explanation of the elements comprising the Underlying Profit.

6. 'Water use' and 'Waste to landfill' numbers exclude Asia.

Environmental performance targets

Indicator	2015 baseline	Target	Target date	2019 actual	2019 reduction	Status
Science-based GHG emissions (tCO ₂ -e) ¹	87,565	▼21%	2025	71,462	▼18%	On track
Energy use (GJ)	791,456	▼5%	2020	695,678	▼12%	On track
Office paper (tonnes)	892	▼10%	2020	511	▼43%	On track
Customer eStatements (proportion online only)	34%	▲to 50%	2020	64%	-	On track
Water use (potable water withdrawal) (kL)	405,642	▼10%	2020	385,005	▼5%	Not On track
Waste to Landfill (tonnes)	2,518	▼5%	2020	1,871	▼26%	On track
Data Centre PUE (Power Usage Effectiveness) ²	1.4-1.6	≤1.5	2020	1.4	-	On track

1. This target covers all direct GHG emissions (Scope 1) and indirect GHG emissions from consumption of purchased electricity (Scope 2) across all GHGs required in the GHG Protocol Corporate Standard – with the exception of data centre emissions. Data centres are excluded as there is currently no data centre science-based target setting methodology available. The target has been prepared in accordance with the Sectoral Decarbonisation Approach (SDA) 'Services Buildings' methodology published by the Science Based Target initiative.

2. Target applies to all Australian data centres only. Actual PUE figure reported (not percentage reduction).

Performance against targets

2019 is the fourth year reporting against our current environmental performance targets. This year, we progressed towards our 2025 science-based GHG emissions target, delivering a 18% reduction from our 2015 base year. We are progressing well towards our 2020 targets, with the exception of waste.

Certifications

NAB's environmental policy is aligned to ISO14001 requirements. Our approach to environmental management is integrated within our risk management framework, policies and procedures. For NAB, the detailed work procedures and activities covered by ISO 14001 are undertaken by an external property services provider on behalf of NAB.

In 2019, BNZ maintained their Enviro-Mark Bronze level certification for its environmental management system. Enviro-Mark certification is aligned to ISO14001. Next year, we aim to achieve silver status.

We published our National Carbon Offset Standard Public Disclosure Summary online here: <https://www.nab.com.au/about-us/social-impact/shareholders/resource-library>.

Compliance

There were no fines or penalties for environmental non-compliance during the year.

Gross greenhouse gas emissions by activity

[Home](#)

(tCO ₂ -e) GHG emissions	% change from prior year	2019	2018	2017	2016	2015
Scope 1						
Building-based refrigerants - HVAC, refrigerators	▼2%	1,619	1,657	1,443	1,380	1,675
Business travel ¹ - vehicle fleet and status-use vehicles	▲1%	8,483	8,416	8,597	8,909	8,742
Stationary energy - combustion of fuel: diesel, gas, propane	▲0.3%	8,976	8,947	9,146	7,874	12,430
Vehicle air conditioning refrigerant ¹	▼31%	130	188	190	210	205
Total scope 1	▼0.01%	19,207	19,209	19,376	18,373	23,052
Scope 2						
Stationary energy - electricity (Scope 2)	▼8%	90,434	97,820	103,936	131,658	162,029
Scope 3						
A4 and A3 paper purchased	▼41%	17	29	49	210	380
Base-building energy - combustion of fuel: diesel, gas (AUS only)	▼22%	1,730	2,230	1,946	2,188	1,623
Base-building energy - electricity (AUS & NZ only)	▼1%	16,897	17,066	18,363	18,994	20,531
Business travel - Air travel ²	▼5%	21,105	22,153	18,975	26,600	28,217
Business travel - Hotel stays	▲36%	3,843	2,828	3,082	5,072	5,234
Other business travel ³	▲3%	2,983	2,891	3,014	4,524	5,571
Transmission losses - base-building energy: diesel, gas, electricity (AUS & NZ only)	▼10%	2,036	2,265	2,350	2,638	2,953
Transmission losses - stationary energy: diesel, gas, propane, electricity	▼12%	10,328	11,703	12,749	18,333	23,902
Waste to landfill	▼6%	2,165	2,291	2,693	2,994	3,062
Waste to incineration	▼28%	154	214	266	DNR	DNR
Materials Recycled/Diverted from landfill	N/A	15	DNR	DNR	DNR	DNR
Water use	▲1%	450	447	463	517	30
Waste water	▲85%	25	14	DNR	DNR	DNR
Paper Statements (Non Carbon Neutral) (New Zealand only)	▼7%	145	155	163	DNR	DNR
Total scope 3	▼4%	61,893	64,287	64,113	82,070	91,503
Gross GHG emissions (Scope 1, 2 and 3) prior to renewable energy purchase	▼5%	171,535	181,316	187,425	232,100	276,584
Renewable electricity purchased	▲820%	(3,360)	(365)	(553)	(13,182)	(20,644)
Carbon offsets retired	▼7%	(168,175)	(180,950)	(186,872)	(218,918)	(255,940)
Net GHG emissions (carbon neutral)		-	-	-	-	-

1. Vehicle air conditioning includes work-use vehicle fleet and status-use vehicles (2016 and prior - UK only).

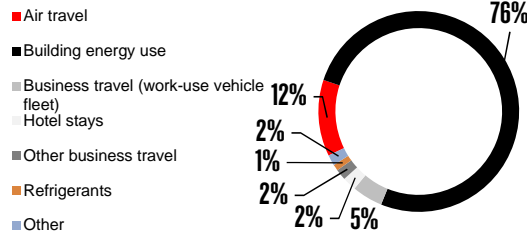
2. Business travel air includes DEIBIS's required distance uplift (but excludes radiative forcing).

3. Other business travel includes employee vehicles, ferries (2016 and prior - UK only), rail (UK and Japan), rental cars, status use vehicles (2016 and prior - UK only), taxi use, work use vehicles and supplier vehicles (2016 and prior - UK only).

4. Total figures in table may differ slightly due to rounding.

GHG emissions by source (%)	2019
Air travel	12%
Building energy use	76%
Business travel (work-use vehicle fleet)	5%
Hotel stays	2%
Other business travel	2%
Refrigerants	1%
Other	2%

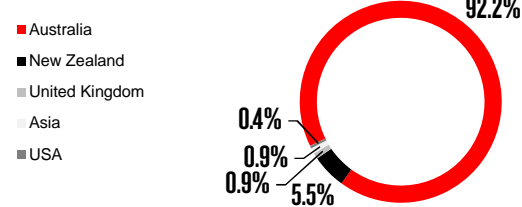
GHG EMISSIONS BY SOURCE (%)



GHG emissions by region (%)	2019
Australia	92.2%
New Zealand	5.5%
United Kingdom	0.9%
Asia	0.9%
USA	0.4%

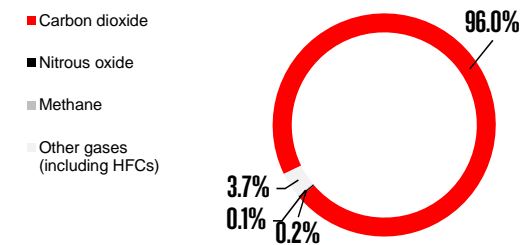
1. Total percentages shown in pie chart may not equal 100% due to rounding.

GHG EMISSIONS BY REGION (%)¹



GHG emissions by gas type (%)	2019
Carbon dioxide	96.0%
Nitrous oxide	0.2%
Methane	0.1%
Other gases (including HFCs)	3.7%

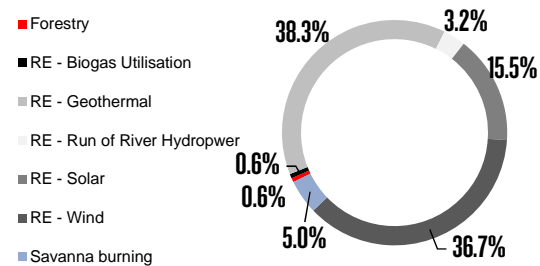
GHG EMISSIONS BY GAS TYPE (%)



Offset portfolio by project type for actual GHG emissions (%)	2019
Forestry	0.6%
RE - Biogas Utilisation	0.6%
RE - Geothermal	38.3%
RE - Run of River Hydropwer	3.2%
RE - Solar	15.5%
RE - Wind	36.7%
Savanna burning	5.0%

1. Total percentages shown in pie chart may not equal 100% due to rounding.

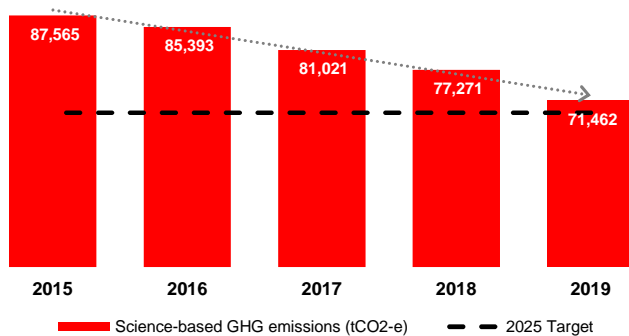
OFFSET PORTFOLIO BY PROJECT TYPE FOR ACTUAL 2019 GHG EMISSIONS (%)¹



Science-based GHG emissions (tCO ₂ -e) ¹	2019	2018	2017	2016	2015
Science-based GHG emissions (tCO ₂ -e)	71,462	77,271	81,021	85,393	87,565
2025 Target	69,176	69,176	69,176	69,176	69,176

1. This target covers all direct GHG emissions (Scope 1) and indirect GHG emissions from consumption of purchased electricity (Scope 2) across all GHGs required in the GHG Protocol Corporate Standard – with the exception of data centre emissions. Data centres are excluded as there is currently no data centre science-based target setting methodology available. The target has been prepared in accordance with the Sectoral Decarbonisation Approach (SDA) 'Services Buildings' methodology published by the Science Based Target initiative.

SCIENCE-BASED GHG EMISSIONS V 2025 TARGET



Direct and indirect energy consumption and production

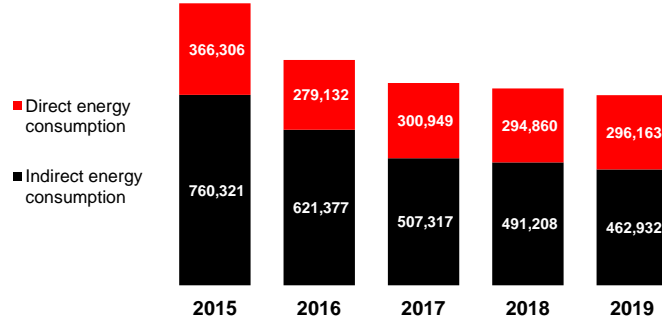
Home

(GJ)	2019	2018	2017	2016	2015
Indirect energy consumption	462,932	491,208	507,317	621,377	760,321
Direct energy consumption	296,163	294,860	300,949	279,132	366,306
Gross energy consumption	759,096	786,068	808,266	900,509	1,126,627
Indirect energy production (tri-generation and solar PV)	(63,418)	(60,541)	(55,869)	(36,028)	(42,746)
Net energy consumption	695,678	725,527	752,397	864,481	1,083,881

Direct and indirect energy consumption and production

Our global energy consumption and production data is presented below. We produce electricity through our tri-generation plant and solar panels installed on our buildings, in addition to purchasing energy from the grid.

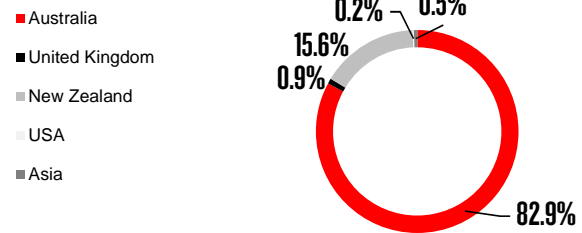
DIRECT AND INDIRECT ENERGY CONSUMPTION (GJ)



Net energy use by region	2019
Australia	82.9%
United Kingdom	0.9%
New Zealand	15.6%
USA	0.2%
Asia	0.5%

1. Total percentages shown in pie chart may not equal 100% due to rounding.

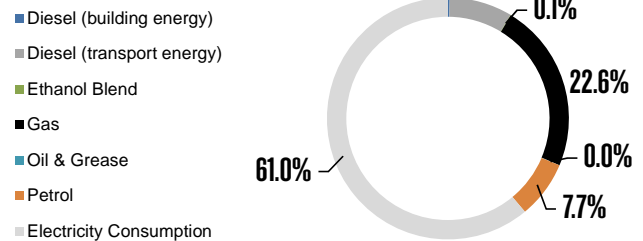
NET ENERGY USE BY REGION (%)¹



Net energy consumption by fuel type (%)	2019
Diesel (building energy)	0.3%
Diesel (transport energy)	8.4%
Ethanol Blend	0.1%
Gas	22.6%
Oil & Grease	0.0%
Petrol	7.7%
Electricity Consumption	61.0%

1. Total percentages shown in pie chart may not equal 100% due to rounding.

NET ENERGY CONSUMPTION BY FUEL TYPE (%)¹



Other environmental performance indicators (water, waste, paper, recycling, travel)

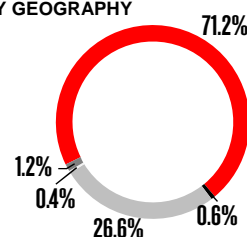
Other environmental performance indicators	Units	% change from prior year	2019	2018	2017	2016	2015
Office paper purchased (A3 and A4)	tonnes	▼9%	511	574	716	966	1,156
Office paper purchased (A3 and A4) per FTE	kg/FTE	▼11%	15	17	21	22	27
Online statements	count	▲5%	5,254,464	5,013,553	5,211,439	3,340,448	2,723,800
Printed statements	count	▼17%	2,937,744	3,530,997	4,408,847	4,790,202	5,320,926
Online only statements (percentage) ¹	%	▲9%	64%	59%	54%	41%	34%
Materials recycled/diverted from landfill	tonnes	▼8%	2,083	2,254	2,717	3,714	4,801
Waste generated	tonnes	▼6%	3,954	4,202	5,022	6,133	7,651
Waste to landfill per FTE	kg/FTE	▼4%	55	58	67	55	66
Waste diverted from landfill (percentage) ¹	%	▼2%	53%	54%	54%	61%	63%
Water use	kL	▲1%	391,050	387,598	400,655	492,153	616,295
Work use vehicles	number	▲0.3%	1,819	1,814	1,816	1,947	1,845
Work use vehicles fuel consumption	kL	▲0.3%	3,358	3,349	3,440	3,529	3,454
Air travel	'000pkms	▲4%	117,949	113,100	101,144	142,319	139,273
Hotel stays	nights	▲17%	69,276	59,368	63,085	101,149	105,895

¹ Customer statement data is as at 30 June. As these indicators are a percentage outcome, the 'Change' value is equal to the actual result.

Paper purchased by geography (%)	2019
Australia	71.2%
United Kingdom	0.6%
New Zealand	26.6%
USA	0.4%
Asia	1.2%

PAPER PURCHASED BY GEOGRAPHY

- Australia
- United Kingdom
- New Zealand
- USA
- Asia



Summary of emissions reduction and renewable energy opportunities investigated across Australia – as at 30 June 2019

Development stage	Total project number	Total estimated annual CO ₂ (tonnes)
Under investigation	6	285
To be implemented	3	5,593
Implementation commenced	12	4,069
Implemented	917	110,601
Not to be implemented	341	37,826
Total	1,279	158,374

Examples of energy efficient and renewable energy opportunities implemented in Australia in 2019

Activity type	Description	Estimated annual CO ₂ -e savings (metric tonnes)	Investment (AUD) ¹	Annual savings (AUD)	Estimated payback period (yrs)	Estimated initiative life time (yrs)
Low carbon energy Installation	Installing solar panels on our branches	1392	1,118,899	264,442	4	10+ years
Energy efficiency: Building Services	Improving energy efficiency through supplementary HVAC installation.	15	45,000	90,000	1	7-10 years
Energy efficiency: Building Services	Upgrading and optimising lighting assets within our buildings.	230	252,310	96,977	3	7-10 years
Energy efficiency: Building Services	Cooling tower upgrade	54	-	10,500	-	10+ years

¹ Environmental specific spend additional to underlying core project.

Global Reporting Initiative (GRI) Standards index

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GRI 102: General disclosures	Reference to Sustainability Report (unless otherwise stated)	Website	UN Global Compact Principles
102-1 Name of the organisation	Cover (page 1)		
102-2 Primary brands, products and services	Annual Review (pages 10-13)	link	7
102-3 Location of headquarters	Melbourne, Australia		
102-4 Location of operations	Annual Review (page 10)	link	
102-5 Ownership and legal form	Annual Financial Report (page 121)	link	
102-6 Markets served	Annual Review (page 13)	link	
102-7 Scale of the organisation	Annual Review (page 10)	link	
102-8 Information on employees and other workers	Engaging our people (page 30) Data Pack - People		6
102-9 Supply chain	Data Pack - Supply Chain		
102-10 Significant changes to the organisation and its supply chain	Annual Financial Report (page 8)	link	
102-11 Adoption of the precautionary approach	How we act (page 43)		15
102-12 External initiatives		link	
102-13 Memberships of associations		link	
102-14 Statement from senior decision maker	Leadership message (page 3)		
102-16 Values, code of conduct and code of ethics	Governance, conduct and culture (page 11)		10
102-18 Governance structure	Our approach (page 6)		10
102-40 Stakeholder groups engaged	How we listen (page 9)	link	
102-41 Collective bargaining agreements	Engaging our people (page 31) Data Pack - People		3
102-42 Identifying and selecting stakeholder groups	How we listen (page 9)	link	
102-43 Approach to stakeholder engagement	How we listen (page 9)	link	
102-44 Key topics and concerns raised	How we listen (page 9)	link	
102-45 Entities included in the consolidated financial statements	Annual Financial Report (page 5)	link	
102-46 Defining report content and topic boundaries	About this report (page 2) How we listen (page 9)		
102-47 List of material topics	How we listen (page 10) This index		
102-48 Restatements of information	Data Pack - Home		
102-49 Changes in reporting	Data Pack - Home		
102-50 Reporting period	About this report (page 2)		
102-51 Date of most recent previous report	16 November 2018	link	
102-52 Reporting cycle	Annual		
102-53 Contact point for questions	social.impact@nab.com.au		
102-54 Claims of reporting in accordance with the GRI Standards	About this report (page 2)		
102-55 GRI content index	This index		
102-56 External assurance	Assurance (page 46)	link	

Material topics	Impact boundary		
Employment	External (Customers, communities, shareholders); Internal (Employees)		
Climate change	External (Shareholders, customers, communities); Internal (Employees)		
Customer privacy	External (Customers, shareholders); Internal (Employees)		
Human rights assessment	External (Customers, suppliers, communities); Internal (employees)		
Responsible finance (lending)	External (Customers, communities, shareholders); Internal (Employees)		
GRI standard and disclosure	Reference to Sustainability Report (unless otherwise stated)	External assurance	UN Global Compact Principles
Employment			
103-1 Explanation of the material topic and its Boundaries	Engaging our people (page 30)		6
103-2 The management approach and its components	As above		
103-3 Evaluation of the management approach	As above		
401-1 New employee hires and employee turnover	As above Data Pack - People	yes	6
401-3 Parental leave	Engaging our people (page 33) Data Pack - People	yes	6
Climate change			
103-1 Explanation of the material topic and its Boundaries	Addressing climate change and environmental sustainability (page 21)		
103-2 The management approach and its components	As above How we act (pages 43-44)		
103-3 Evaluation of the management approach	As above		
201-2 Financial implications and other risks and opportunities due to climate change	As above Annual Financial Report (page 20)		9
Data privacy and confidentiality			
103-1 Explanation of the material topic and its Boundaries	Transformation & technology (page 35)		
103-2 The management approach and its components	As above		
103-3 Evaluation of the management approach	As above		
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Transformation & technology (page 36) Data Pack - Customer	yes	
Human rights assessment			
103-1 Explanation of the material topic and its Boundaries	Respecting human rights (page 44)		1, 2, 4, 5, 6
103-2 The management approach and its components	As above		
103-3 Evaluation of the management approach	As above Data Pack - UNGP HR Index		
412 Human rights assessment: Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	As above		2, 10
412 Human rights assessment: Employee training on human rights policies or procedures	As above		
Responsible finance (lending)			
103-1 Explanation of the material topic and its Boundaries	Customer support and experiences (page 14) Financial health and resilience (page 15) Responsible finance (page 19)		
103-2 The management approach and its components	As above		
103-3 Evaluation of the management approach	As above		
F56 product portfolio: Percentage of the portfolio for business lines by specific region, size (e.g. micro/SME/large) and by sector	Responsible finance (page 19)		
F57 product portfolio: Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose	Financial inclusion (page 17) Responsible finance (page 19) Data Pack - Customer	yes	
F58 product portfolio: Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose	Climate change commitments (page 27) Data Pack - Customer		7, 8, 9

We understand that human rights issues can arise in our own operations and when engaging with external parties, especially customer interactions, financing and investments, and our supply chain. Salient human rights issues can occur in a range of geographies where NAB operates or has business relationships.

We identify salient human rights issues through our internal risk management and materiality review processes. We also regularly engage with civil society and other stakeholders who raise human rights issues with us. During the year, we participated in a range of multi-stakeholder forums like industry, government and civil society seminars, roundtables and working groups to discuss human rights and grow shared understanding of issues such as modern slavery.

How we are addressing salient human rights is described throughout this report and is summarised in the table below.

Salient human rights issue	Reference to Sustainability Report (unless otherwise stated)	Website 1	Website 2
Anti-discrimination, harassment and bullying	Governance, conduct and culture (page 12) Managing human rights (pages 44-45)		
Freedom of association and collective bargaining	Engaging our people (page 31)		
Fair, equitable, diverse, inclusive and flexible employment practices	Engaging our people (pages 31-34)	link	
Financial literacy and inclusion	Financial inclusion (pages 17-18)	link	
Health, safety, security and wellbeing	Engaging our people (page 31)	link	
Customer financial resilience and hardship	Improving customer support (pages 15-17, 20, 41)	link	
Fair and responsible financial products and services	Acting on customer feedback (page 9) Making things right for customers (page 12) Customer support and experiences (pages 14-15)		
Accessible products, services, technology and buildings	Customer support and experiences (page 18)	link	
Corruption and bribery	Tackling financial crime (page 35)	link	
Privacy, information security and data protection	Transformation and technology (pages 35-37)	link	
Freedom from forced labour, slavery and servitude and child labour (inc. modern slavery)	Respecting human rights (pages 44-45)	link	link
Indigenous rights and inclusion	Cultural inclusion (page 33) Stronger communities (page 38) Supporting Indigenous success (page 42)	link	
Improper land acquisition/land grabbing	Data Pack - ILA Progress	link	

United Nations Guiding Principles for business and human rights - cross reference

Section of the Framework	Reference to Sustainability Report (unless otherwise stated)	Website 1	Website 2
Policy commitment	Website - Human Rights Website - Human Rights Policy	link	link
Embedding Respect	Website - Human Rights Website - Human Rights Policy	As above	As above
Statement of salient issues	Refer table above		
Explanation of salient issues	Website - Human Rights	As above	
Geographical focus (if any)	Not applicable		
Additional severe impacts (if any)	Not applicable		
Specific Policies	Website - Human Rights Website - Human Rights Policy Website - Improper Land Acquisition Policy Statement	link	As above
Stakeholder Engagement	Respecting human rights (page 44)	link	
Assessing impacts	Website - Human Rights Respecting human rights (pages 44-45)	As above	
Integrating Findings and Taking Action	Website - Human Rights	As above	
Tracking Performance	Website - Human Rights Respecting human rights (pages 44-45)	As above	
Remediation	Website - Human Rights Website - Human Rights Policy Website - Contact Us	As above	link

Progress against our Improper Land Acquisition policy commitments

Home

Commitment	Status	Update
#1. NAB commits to respecting the land rights of communities that are, or may be, impacted by our customers and suppliers through the inclusion of land rights in our approach to ESG risk management, relevant policies and tools.	✓	NAB's Human Rights Policy underwent its annual review this year. As part of the review process, we engaged with relevant Non-Governmental Organisations. Our Policy includes a requirement to consider improper land acquisition and sets out how NAB respects human rights to meet our obligations related to international conventions, legal and regulatory requirements and voluntary commitments. NAB considers land rights ESG risk assessment processes for lending and procurement. This is particularly relevant when lending to companies in soft commodities, forestry, resources and power generation sectors where there is potential for land acquisition issues to impact on Indigenous communities and landholders in developing countries.
#2. NAB will not knowingly finance or provide advice to companies that have a prevailing conviction for improper land acquisition or against which NAB considers there is credible evidence of material violations of applicable laws and regulations.	✓	In 2019, our ESG risk assessment processes identified a small number of customers involved in a project where improper land acquisition issues had arisen. NAB does not finance the project and no NAB funding has been used in association with the project. NAB has engaged with the customers and is satisfied that remediation is in progress. NAB will continue to monitor the issue.
#3. NAB will review customer relationships where there is a risk of a customer operating outside the law or not meeting NAB requirements. If this risk is not addressed to NAB's satisfaction, NAB may exit the banking relationship.	✓	Considering improper land acquisition and how our customers address this risk is part of our ESG risk assessment undertaken as part of our credit risk and due diligence processes. In 2019, NAB continued to closely monitor a small number of customers that have faced allegations of improper land acquisition so we can understand how they are addressing and managing the issue.
#4. NAB will investigate and, if appropriate, join relevant multi-stakeholder and industry initiatives, which seek to address and prevent, the occurrence of improper land acquisition – this may include standards, certification or verification systems.	✓	NAB continues to be a member of a UN Global Compact led sector working group that focuses on human rights issues and responses relevant to the finance sector. NAB has been a signatory to the Equator Principles (EPs) since 2007. When providing project finance in non-designated countries ¹ (defined in the EP III), this includes applying International Finance Corporation (IFC) Performance Standards ² . Standards 5 (Land Acquisition and Involuntary Resettlement) and 7 (Indigenous Peoples) are particularly relevant, when we review how our customers manage land rights and potential impacts on local communities. The EPs are currently undergoing review to develop Equator Principles 4 (EP4). NAB is part of industry working groups that are reviewing EP4, including giving consideration to proposed changes relating to social impacts and human rights.
#5. NAB will work towards implementing risk processes by 2020, so that major lending and advisory customers whose operations include significant land acquisition, can verify to NAB that their operations are giving appropriate consideration to land rights of local and indigenous communities, particularly in developing countries.	In progress	Work completed to satisfy commitments 1 and 4 (above) and 6 (below) will help NAB deliver on commitment 5 by 2020.
#6. NAB is committed to building understanding and recognition of the issue of land rights and improper land acquisition and how it can be prevented through: • engaging and educating our employees, particularly bankers. • engaging with our customers, suppliers and other stakeholders to encourage business best practice in respecting and protecting land rights of relevant communities.	✓	We continue to include information on improper land acquisition in ESG risk training and presentations to credit managers and relevant bankers. Where relevant, bankers share NAB's improper land acquisition policy statement with customers in relevant sectors such as soft commodities, forestry and mining. The requirement to consider improper land acquisition in NAB's business relationships is included within our Human Rights Policy. We continue to review, monitor and engage with relevant large institutional and corporate customers where indigenous land rights issues could arise. To minimise the potential for human rights and improper land acquisition concerns in the bank's own operations, NAB continues to purchase Fair Trade products in Australian offices and branches. Our website has details on how affected external parties can provide feedback or raise concerns (including human rights related concerns such as improper land acquisition). This can be done by contacting our NAB Resolve team.
#7. NAB will work within our sector and with our customers to encourage standardised disclosure on social and environmental risks.	✓	NAB continues to participate in industry initiatives which support standardisation of ESG risk information. These include the Equator Principles, the Portfolio Carbon Initiative and CDP Water and Forestry Surveys ³ .
#8. NAB will report publicly on an annual basis on the actions NAB has taken to meet the commitments in our improper land acquisition policy statement.	✓	This commitment is met through this progress update. NAB will continue to report each calendar year.

1. Non-designated countries are those countries not found on the list or designated countries published by the Equator Principles Association.

2. https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/performance-standards.

3. NAB is a signatory to CDP's water, forest, climate change and carbon action surveys.