



**national
australia
bank**

2024

**Modern Slavery and
Human Trafficking
Statement**



Contents

Introduction and Reporting Entities (Mandatory Criterion 1)	2	Consultation on preparing a joint statement (Mandatory Criterion 6)	27
About NAB Group – Structure and Operations (Mandatory Criterion 2)	3	Other relevant information (Mandatory Criterion 7)	28
Lending and Wealth-related Activities	4	COVID-19 Supplier Impacts	28
Supply chain	5	Engagement in industry working groups and initiatives	28
Governance	7	Appendix 1: Reporting entity activity overview	29
Risk of exposure to modern slavery (Mandatory Criterion 3)	8		
Potential modern slavery risk exposure arising from customer relationships	9		
Potential modern slavery risk exposure in our supply chain	12		
Actions taken to assess and address modern slavery risk, including due diligence and remediation processes (Mandatory Criterion 4)	13		
Risk Management	13		
Policies	14		
Due Diligence	15		
Colleagues	15		
Supply chain management	16		
Investigating and managing potential instances of supplier-related modern slavery and human trafficking (the process)	17		
Customer Management	18		
Wealth-related activities	20		
Ongoing Customer Due Diligence	22		
Investigating and managing potential instances of customer-related modern slavery and human trafficking (the process)	23		
Grievance and feedback mechanisms	24		
Training and communication	24		
Assessing effectiveness of modern slavery risk management (Mandatory Criterion 5)	25		
Identification of potential instances of modern slavery and human trafficking	25		
Areas for delivery of risk management improvements in FY2024	27		



Introduction and Reporting Entities

(Mandatory Criterion 1)

This Modern Slavery and Human Trafficking Statement (Statement) is made pursuant to the *Modern Slavery Act 2015* (UK) ('the UK Modern Slavery Act') and the *Modern Slavery Act 2018* (Cth) ('the Australian Modern Slavery Act') by National Australia Bank Limited (ABN 12 004 044 937) (NAB) in respect of NAB and its related bodies corporate ('NAB Group' or 'the Group') as at 30 September 2024.

The Group entities listed in Table 1 are reporting entities under the Australian Modern Slavery Act in their own right. Each of the listed reporting entities has approved the preparation of a joint statement on their behalf.

On 30 April 2024, NAB completed the sale of its New Zealand wealth management business to newly established entity FirstCape Limited (FirstCape) in which NAB, Jarden Wealth and Pacific Equity Partners (PEP) are shareholders. The transactions brought together NAB's JBWere New Zealand and BNZ Investment Services Limited (BNZISL), together with Jarden Wealth and Harbour Asset Management to create a leading advice and asset management business for clients in New Zealand.

Consequently, on 1 May 2024, BNZISL, BNZ's provider of wealth products and services, ceased to be owned by BNZ and JBWere New Zealand ceased to be owned by NAB. As such, all references pertaining to BNZISL and BNZ's Responsible Investment Policy, throughout this statement, are only applicable to this date.

This Statement relates to the NAB Group financial year from 1 October 2023 to 30 September 2024 (FY2024).

Table 1: Group entities that are reporting entities under the Australian Modern Slavery Act in FY2023

National Australia Bank Limited ("NAB")	JBWere Limited ("JBWere")
National Equities Ltd ("NEL")	Advantage Financial Services Pty Ltd ("AFS")
86 400 Holdings Limited ("ubank")	Advantage Financial Services Holdings Pty Ltd ("AFSH")
nab Covered Bond Trust	National RMBS Trust 2012-1
National RMBS Trust 2023-1 ¹	National RMBS Trust 2008-2
National RMBS Trust 2015-2	

This Statement also covers the Group's offshore subsidiaries and activities, including the Bank of New Zealand (BNZ), and its subsidiaries and NAB's branches and subsidiaries in Asia (China, Hong Kong, Singapore, India, Indonesia, Vietnam and Japan), the UK, France and the USA.

Figure 1: NAB's operational locations



¹ RMBS 2023-1 was created in October 2023 and in scope for the first time based on annual consolidated revenue.



About NAB Group – Structure and Operations

(Mandatory Criterion 2)

NAB Group is a financial services organisation that provides a range of financial products and services. The majority of the Group’s financial services businesses operate in Australia and New Zealand, with branches and subsidiaries located in Asia, the UK, France and the USA. Key businesses include Business and Private Banking, Personal Banking, Corporate and Institutional Banking, and New Zealand Banking. Major brands in Australia currently include nab, ubank, and JBWere, and in New Zealand, BNZ.

The Group employs more than 38,000² colleagues and serves more than 10 million customers through 611 branches and business banking centres, 1040 ATMs and online banking.

Other operational activities include direct employment of workers;³ provision, production, processing, and delivery of products and services, financial investments, managed/operated joint ventures, leasing of property, charitable activities, product distribution, strategic sourcing, marketing and sales. These activities take place across the jurisdictions listed in the Table 2, and in non-customer facing Innovation Centres located in India and Vietnam.



38,000²
colleagues



611
branches



~10M
customers



1040
ATMs

A description of the primary activities of the Group’s key Divisions and BNZ is provided in Table 2 below.

Table 2: Primary activities of key Divisions and BNZ

Division	Description	Operating region
Business and Private Banking	Business and Private Banking focuses on NAB’s priority small and medium enterprise (SME) customer segments. ¹ This includes diversified businesses, as well as specialised Agriculture, Health, Professional Services, Franchisees, Government, Education and Community service segments along with Private Banking and JBWere.	Australia and New Zealand
Personal Banking	Personal Banking provides banking products and services to customers including securing a home loan and managing personal finances through deposits, credit card or personal loan facilities. Customers are supported through a network of branches and ATMs, call centres, digital capabilities as well as through proprietary lenders and mortgage brokers.	Australia
Corporate and Institutional Banking	Corporate and Institutional Banking partners with customers globally to meet their most complex financial needs, through a range of products and services including client coverage, corporate finance, markets, transactional banking, enterprise payments and asset servicing (which is being wound down over approximately 3 years from November 2022). Corporate and Institutional Banking serves its customers across Australia, US, Europe and Asia with specialised industry relationships and product teams. Corporate and Institutional Banking included the Bank of New Zealand’s Markets Trading operations up to 30 September 2023.	Australia, UK, US, France, China, Japan, HK and Singapore
New Zealand Banking	New Zealand Banking serves customers across New Zealand with personal and business banking services, through a nationwide network of customer centres, digital and assisted channels. Bank of New Zealand (BNZ) is New Zealand’s largest business bank, one of the largest providers of agricultural financing and has continued to gain market share in personal and business segments. From 1 October 2023, the Bank of New Zealand’s Markets Trading operations and enabling units are reported within New Zealand Banking.	New Zealand
Corporate Functions and Other	Corporate Functions and Other includes ubank and enabling units that support all businesses including Treasury, Technology and Enterprise Operations, Data, Digital and Analytics, Support Units and eliminations. Corporate Functions and Other included the enabling units of the Bank of New Zealand up to 30 September 2023.	Australia, New Zealand, UK, US, France, China, Japan, HK, Singapore, Vietnam & India

² Number of full-time equivalent colleagues as at 30 September 2024, excluding discontinued operations.

³ In providing financial services, the Group employs a professional, largely adult, workforce where the risk of modern slavery is low. All employees are employed in compliance with local labour laws, including meeting any requirements in relation to child labour. Further information is the *Colleagues* section on page 15.



Lending and Wealth-related Activities

Banking activities include provision of various types of transactional accounts, acceptance of deposits (including current, savings and term deposits), loans and advances (including mortgages, auto loans, business loans, and personal loans), overdrafts, credit cards, custodial services, bank guarantees, collection and transfer of funds, underwriting, capital raising and other forms of finance and related services.

In FY2024, the Group provided customers with \$738.2 billion (FY2023: \$708.5 billion) in loans and advances,⁴ including acceptances as at 30 September 2024.

A regional breakdown of the Group's credit risk exposures by geography is provided in Figure 2. This provides credit risk exposures by major geographical area, based on the booking office where the exposure was transacted.

A sectoral breakdown of the Group's credit risk exposure by Level 1 ANZSIC classification as Exposure at Default (EAD) is provided in Table 3.

Figure 2: Group's credit risk exposures by geography by the location of the entity where the exposure is booked

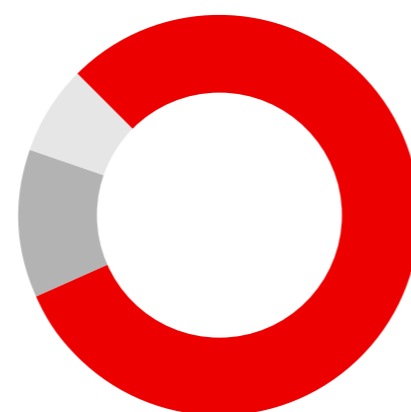


Table 3: Group lending profile by industry, in EAD as \$m, as at 30 September 2024⁵

Industry	2024 (\$m)	2023 (\$m)	2022 (\$m)
Accommodation, cafes, pubs and restaurants	12,657	11,449	10,722
Agriculture forestry, fishing and mining	68,917	68,516	68,477
Business services and property services	23,519	23,045	23,904
Commercial property	84,551	80,130	84,369
Construction	13,910	13,000	12,611
Finance and insurance	183,742	217,402	255,702
Government and public authorities	70,974	64,501	62,660
Manufacturing	20,269	21,505	22,736
Personal	20,910	20,770	16,868
Residential mortgage	476,271	466,423	445,740
Retail and wholesale trade	33,665	32,417	35,096
Transport and storage	23,429	24,615	26,690
Utilities	14,787	13,942	14,760
Other ⁶	37,210	34,946	27,295
Total	1,084,811	1,092,662	1,107,630

Wealth-related activities including the provision of wealth advice, investment advice, philanthropic advice and family advisory services to clients. Product offerings include, but are not limited to, access to Australian listed investments, international securities, managed funds, multi-currency accounts, unlisted bonds, structured trades, margin lending and deposit products.

⁴ Including loans and advances at fair value.

⁵ Total EAD for the Level 2 regulatory group, excluding EAD for securitisation exposures within the scope of APS 120 Securitisation.

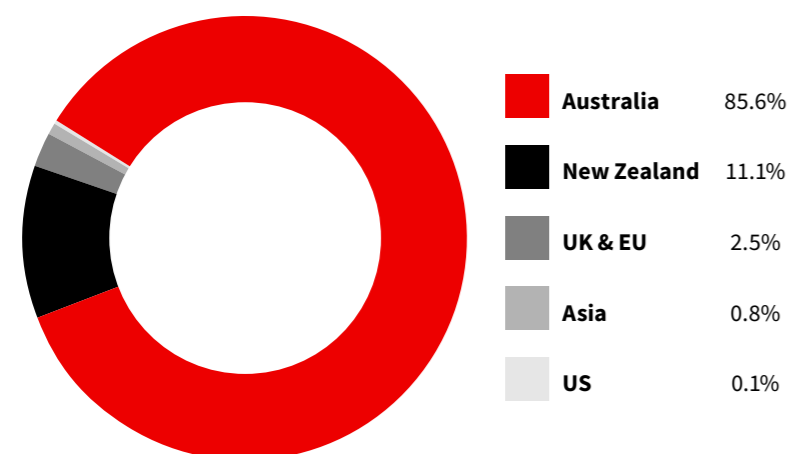
⁶ 'Other' category includes health and community services, and education.



Supply chain

The Group has a global supply chain. The Group recognises that as a large purchaser of goods and services, the business conduct and performance of its suppliers can influence its impact and reputation, particularly within the communities in which the Group operates, and more broadly. The Group takes a risk-based approach and seeks to do business with suppliers and other third parties that have similar values, ethics and sustainable business practices, including those related to human rights (which includes consideration of modern slavery and human trafficking).

Figure 3: NAB Group (%) Direct Spend by country.



Supply chain relationships include suppliers from key sectors detailed in Table 4.

⁷ Australia and New Zealand only.

⁸ Registered suppliers include any supplier registered in the sourcing system with a paid invoice during the reporting period.

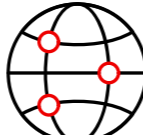
⁹ Contracted suppliers include any supplier that has had an active contract in NAB and BNZ sourcing systems within the 12-month period. Due to the timing of migration, this will include every supplier that has at least one contract in NAB and BNZ sourcing systems, regardless of status.

¹⁰ Material supplier includes all Material Outsource Suppliers and Material Not Outsource Suppliers in Australia. Material Outsourced suppliers has been 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 the Group's business operations or its ability to manage risks effectively.

¹¹ Total Group supplier spend including corporate card.


~2,757
 registered
 suppliers^{7,8}


~1,932
 contracted
 suppliers^{7,9}


~156
 material
 suppliers^{7,10}


6.6 billion
 spend¹¹

Table 4: Sourcing spend by procurement categories (%) as at 30 September 2024¹²

	Procurement category	% of spend
	Information, Communications, and Technology (ICT): includes IT applications, hardware and software, telecommunications, infrastructure and data centre, application service providers (ASP) & internet delivered services and IT professional services.	35.57
	Human Resources & Recruitment: includes recruitment, contingent labour, contractors, probity, training, car fleet, professional memberships, employee benefits, relocation, health & wellbeing, and corporate uniforms.	6.16
	Property & Facilities Management: includes asset services, cleaning, utilities, waste management, construction management, catering, insurance, rates & taxes, rent and, security.	9.77
	Business Services Enablement: includes professional services (e.g. audit, consulting and legal services) and business process operations (offshore).	7.29
	Financial Services Enablement: includes valuation services, loyalty programs, insurances, market information services, credit decisioning, card services, lending processing and debt management.	21.90
	Print, Production, Processing & Logistics: includes card & cheque production, document services, commercial/proprietary print, processing services, office products and stationery, cash management, couriers, postage and mail services and records management.	2.65
	Other: includes brand, market research, marketing and advertising, publishing, sponsorships, travel, events, functions & conferences, brokerage, financial advisors, memberships (industry and regulatory associations), securities trading and restructure costs.	16.67

¹² Total Group supplier spend excluding corporate card spend.



Figure 4 shows a representation of the Group’s sourcing spend broken down by country of suppliers’ registered offices¹³ as obtained through supplier agreements.



Figure 4: Total supplier spend (%) by country of suppliers’ registered offices

	GEOGRAPHY OF SUPPLIER REGISTERED OFFICE LOCATION	% OF TOTAL SUPPLIER SPEND
1	Australia	69.89 %
2	New Zealand	8.44 %
3	India	4.88 %
4	USA	2.40 %
5	Vietnam	1.89 %
6	United Kingdom	1.33 %
7	Singapore	1.03 %
8	Ireland	0.47 %
9	Belgium	0.10 %
	Total	90.41%¹⁴

¹³ Supplier ‘registered office’ is defined as the supplier business entity office indicated in the supplier contract or other agreement documentation.

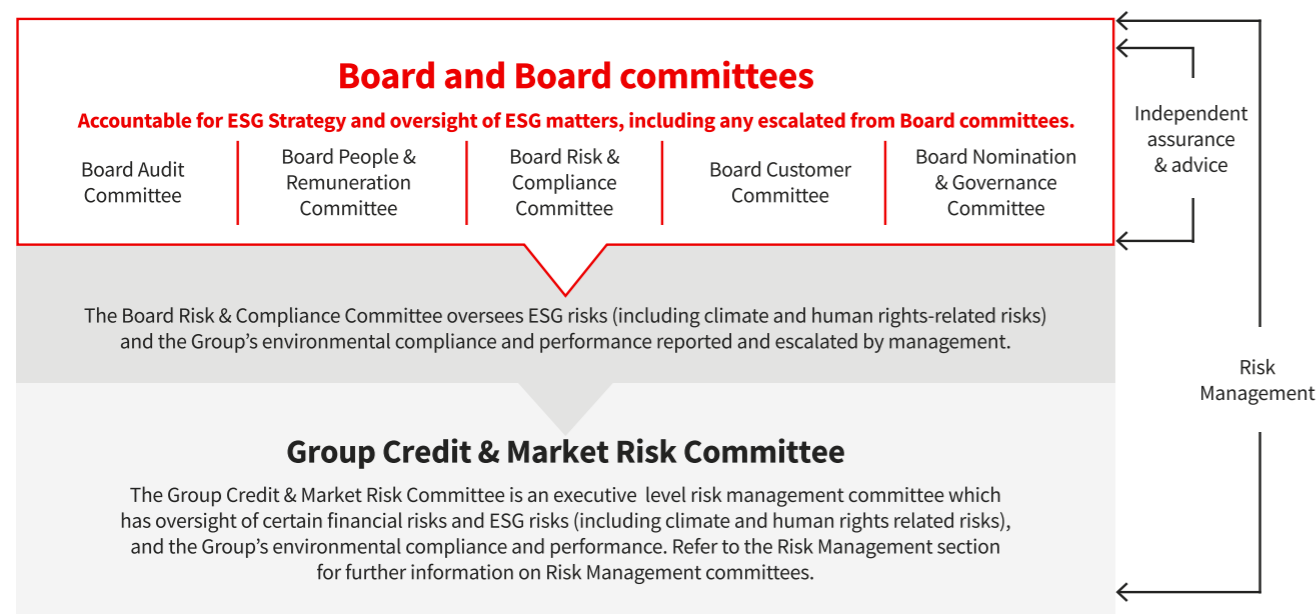
¹⁴ Total does not amount to 100% as countries representing less than 0.1% of total supplier spend are not shown. Remaining 9.59% of total supplier spend geography of registered offices represented across other or unclassified regions.



Governance

The Board retains oversight of ESG-related matters, including those related to human rights. ESG considerations, including those related to human rights, are integrated into business strategy, operations and risk management, where relevant. Modern slavery and human trafficking are examples of human impact crimes and human rights-related risks.

Figure 5: Summary of ESG Risk management and oversight



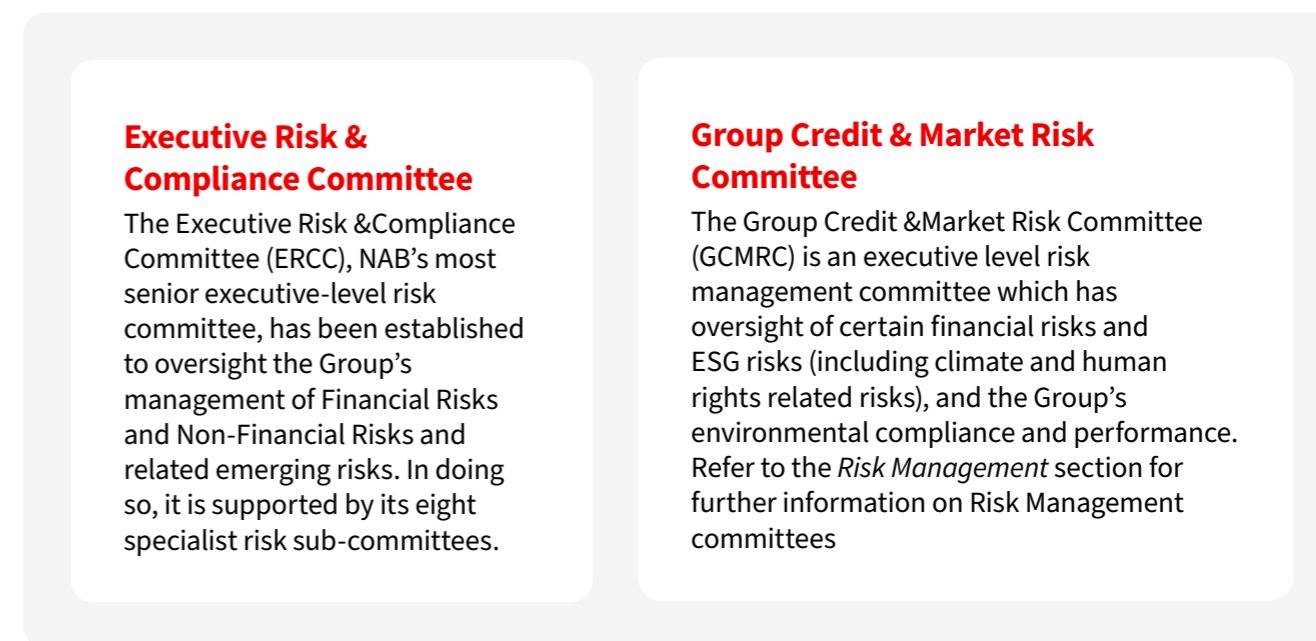
The Board annually approves the Group’s Modern Slavery Statement. Ultimate accountability for risk oversight, risk appetite and risk management rests with the Board. The Board is supported by the Board Risk and Compliance Committee (BRCC) which has responsibility for oversight of the Group’s risk profile and risk management (see Figure 5). This includes human rights-related risk, within the context of Board determined risk appetite.

The BRCC refers all matters of significant importance to the Board, making recommendations to the Board concerning the Group’s current and future risk appetite, risk management strategy and particular risks or risk management practices, including those related to human rights.

Two key Risk Management Committees consider certain enterprise-wide ESG risks including human rights.

The Group Chief Executive Officer (CEO) & Managing Director oversees enterprise-wide risk management through the Executive Risk and Compliance Committee (ERCC) and its supporting sub-committees.

Figure 6: Risk Management Committees



The Group Chief Risk Officer (CRO) is accountable for developing and coordinating the implementation of risk management strategies and frameworks for human rights, including modern slavery and human trafficking risks, in accordance with the Group’s Risk Management Strategy. For human-rights related risks (including modern slavery), the management risk governance oversight is provided by the Group Credit & Market Risk Committee (GCMRC).

Customer-facing teams escalate high risk (including reputational risk) ESG matters for discussion and consideration in business units (Business and Private Banking and Corporate and Institutional Banking) or subsidiary forums (BNZ) involving senior management, executives and other appropriate internal stakeholders including Risk and Corporate Affairs. Where appropriate, these matters may be further escalated to GCMRC.

The Group Money Laundering Reporting Officer (GMLRO) is responsible for oversight and management of the NAB DBG AML/CTF Program and enterprise-wide frameworks for managing anti-bribery and corruption, sanctions, fraud (including scams) and other financial crime risks. For financial crime related risks, including human impact and modern slavery, the key financial crime governance forums are the Financial Crime Forum (FCF) and the Executive Financial Crime Risk Committee (FCRC).

Please refer to *Mandatory criterion 4: Risk Management* section below for further information on the Group’s ESG-related risk management framework and approach.



Risk of exposure to modern slavery

(Mandatory Criterion 3)

As a financial services organisation with a professional workforce,¹⁵ the Group considers the risk of modern slavery within its direct business operations to be low. The majority of colleagues are based in Australia and New Zealand, with most being permanent or fixed term.

NAB also operates Innovation Centres in India and Vietnam. These locations, as well as other NAB branches and operations overseas, operate with employment and procurement policies and standards that are consistent with those applied in Australia and New Zealand. In addition, specific controls are applied in these jurisdictions to ensure compliance with local laws.

A breakdown of the Group’s workforce by contract type and distribution can be found in the **2024 Sustainability Data Pack**. Further information on how we manage risk of exposure for our own employees is also available in *Mandatory criterion 4: The Group’s own operations* below.

The Group recognises that through its supply chain, other third-party relationships and financing activities (via customers and investments made on its own behalf or by its customers) it can be exposed to modern slavery through:



Customers’ use of the Group’s products and services to enable activities that may involve modern slavery.



Lending to customers that are involved in modern slavery, or that have modern slavery in their supply chain.



Purchasing goods and services from suppliers involved in modern slavery, or that have modern slavery in their supply chain.

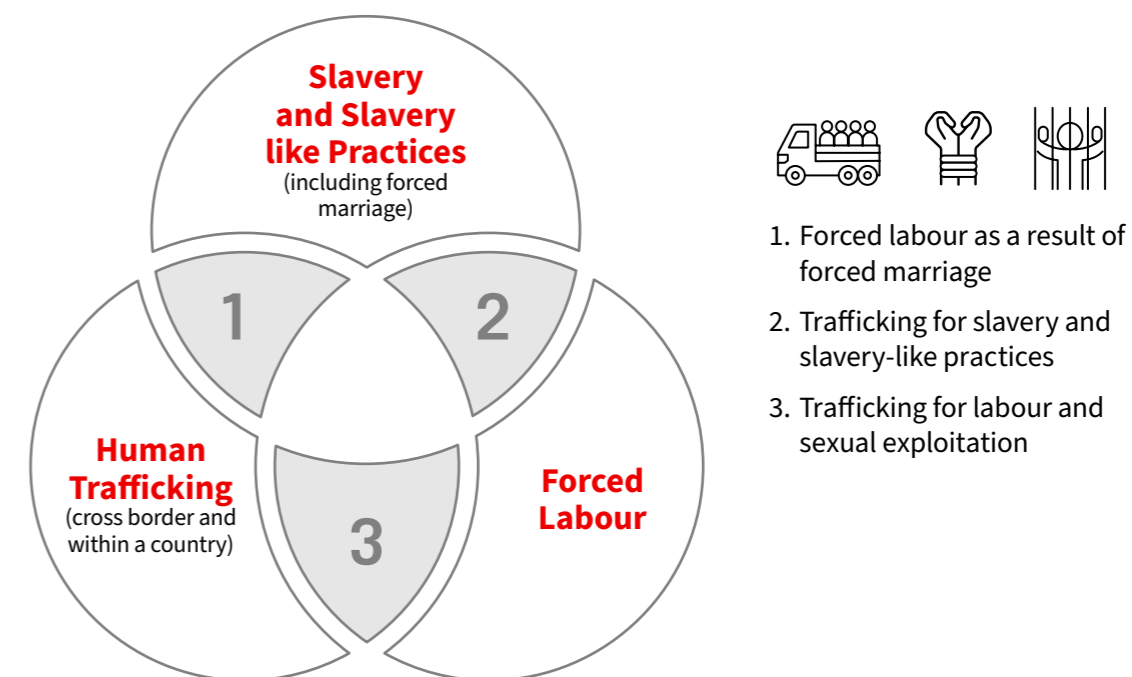


Relationships with other third-parties (e.g. those the Group sponsors or has joint ventures with) involved in modern slavery, or that have modern slavery in their supply chain.

¹⁵ In providing financial services, the Group employs a professional, largely adult, workforce where the risk of modern slavery is low. All employees are employed in compliance with local labour laws, including meeting any requirements in relation to child labour. Further information is the *Colleagues* section on page 15.

Through these relationships, the Group can be exposed to specific types of exploitation that may constitute modern slavery and human trafficking – for example forced labour, child labour, debt bondage, human trafficking, deceptive recruitment, slavery, servitude and forced marriage. Refer to Figure 7 which illustrates the linkages between various forms of modern slavery and human trafficking. As a financial institution, the Group may also inadvertently engage with customers or third-parties that are victims or perpetrators of these practices.

Figure 7: Examples of various forms of modern slavery and human trafficking and the linkages between them¹⁶



The Group takes a risk-based approach to managing ESG issues, including human rights-related issues like modern slavery and human trafficking. The Group regularly looks for opportunities to enhance its ESG risk management processes, which includes how it identifies, assesses, mitigates and monitors potential risk areas where the Group could be exposed to human rights concerns, including modern slavery and human trafficking. Colleagues in customer-facing roles identify and manage ESG risks, including modern slavery-related risk, as part of their day-to-day responsibilities. They are supported by

¹⁶ Figure adapted from *Global Slavery Index 2023 report*, page 8.



colleagues with specialist expertise and understanding of human rights and modern slavery risk who work in Group functions and subsidiaries. For example, in our ESG Risk Management, Legal and Sustainability teams and colleagues with sustainability-related roles embedded in teams within other areas.

The Group maintains a 'High Risk ESG sectors and sensitive areas list' which is used to determine customers and suppliers that may have a higher risk of ESG issues (including modern slavery and human trafficking) and for which additional ESG risk assessment and due diligence may be required, due to the industry sectors in which they operate. Customers and suppliers can also have a higher risk of modern slavery associated with their extended supply chains when these extend into high-risk countries for modern slavery – for example, solar panels, garments and other manufactured goods and parts from factories located in these countries.

NAB also maintains a 'modern slavery risk matrix'. This is a resource to help colleagues in sourcing and customer facing areas to identify and assess potential for modern slavery and human trafficking. The matrix lists countries and sectors/activities that may have a higher risk of modern slavery and considers factors such as vulnerability and prevalence of modern slavery risk.

Potential modern slavery risk exposure arising from customer relationships

There is a risk that the Group's customers or other third-parties may use its financial products in ways that have an adverse impact on people – including using the banking system to launder the proceeds of human impact crimes such as modern slavery and human trafficking. To assist colleagues in identifying indicators of potential modern slavery, or those that may be victims, NAB has developed a 'Human Impact Guide' (Guide). The Guide was developed in 2020, with a second edition released in March 2022 and a third update in 2024.

The Guide helps NAB's financial crime team members, and colleagues more generally, to understand and recognise the range of situations or sectors which are most susceptible to human impact crimes. These human impact crimes include human trafficking and modern slavery practices such as servitude, forced labour, forced or servile¹⁷ marriage, debt bondage and the exploitation of children. There are a range of ways in which people can be exploited through human impact crimes, for example, sex trafficking within escort services has different characteristics to labour trafficking of farmworkers. Each crime typology has unique strategies for recruiting and controlling victims and concealing the

crime. Similarly, there are many ways to identify possible victims and offenders involved in human impact crimes, which are outlined in the Guide.

The Guide also describes indicators of modern slavery and human trafficking and provides case studies to assist colleagues. The Guide is available on NAB's intranet for customer facing colleagues. NAB has shared the Guide with industry and government partners via the Australian Banking Association and the Fintel Alliance.

In 2024, NAB released the third iteration of the Human Impact Investigation Guide to help NAB colleagues detect, investigate and mitigate human impact crimes in their day-to-day roles. The guide sets out various human impact crimes (including child exploitation, sexual exploitation, financial abuse and labour exploitation) and the different methods through which they can occur. The guide provides NAB colleagues with a comprehensive set of financial indicators associated with various human impact crimes, as well as de-identified case studies that illustrate the practical application of these indicators. **Key uplifts to the 2024 version of the Guide include:**

- **The inclusion of artificial intelligence (AI)** as an emerging technology being used to facilitate human impact crimes, with practical examples and applications.

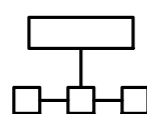
- **The addition of two child exploitation typologies:** sextortion and AI-generated child sexual abuse material, along with related financial indicators.
- **The inclusion of coercive control** as a financial abuse typology, along with related financial indicators.
- **Enhanced guidance for NAB colleagues** on identifying vulnerable customers and referring them to the right teams, ensuring they receive the support they require as outlined in the Banking Code of Practice.
- **Updated financial indicators and case studies** throughout the entire guide to reflect current trends and threats related to human impact crimes.

¹⁷ A servile marriage is one in which 'a person has been transferred, sold or inherited into a marriage with no right to refuse, this may also amount to an offence of slavery' (source: Australian Government Attorney-General's Department website, [Forced marriage | Attorney-General's Department](#)).



Human impact crimes affect everyone. As part of serving customers well and helping our communities prosper, the Group has a responsibility to identify, assess and manage our human impact risks. In response to these risks, the Group takes actions to prevent and deter these activities that can have serious impacts on communities. Key features of the Guide include:

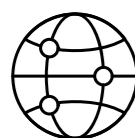
Key features



Human impact typologies and sub-typologies including those related to sexual exploitation, child exploitation and financial abuse. This includes forced sexual servitude, internet-based child abuse, self-generated child abuse material, family/ domestic violence, and technology-facilitated abuse. Child exploitation indicators are grouped according to whether they are general in nature, or whether they align to specific types of offending e.g. live streamed child sexual abuse.



Indicators and key statistics for all typologies to highlight prevalence of, and current trends in, human impact crimes across the globe.



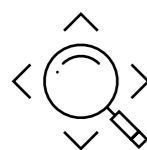
Jurisdictional indicators for consideration when conducting human impact investigations.



A section on **digital technology** – the Group has identified some popular types of applications/software used by offenders. The Guide outlines how they can be used and provides examples of each.



Definitions which explain key differences between labour hire and labour exploitation.



Case studies highlighting examples from **NAB's human impact investigations** that provide real-world indicators and examples to assist investigators.

For banks like NAB, there are a range of ways in which to identify possible human impact crimes like modern slavery, which cover behavioural information, demographic and jurisdictional information, and transactional activity.

The applicability of these indicators will depend on access to the relevant information. For example, some indicators may be visible to branch staff, whereas other indicators require analysis of the customer's transactional activity in order to be identified. Examples of these indicators include (see Figure 8):

Figure 8: Indicators of human impact crimes

Behavioural

These indicators may be witnessed by front-line staff such as those working in branches, or relationship managers who visit their clients. These are the physical and visual manifestations of modern slavery that may be identified directly by staff interacting with customers. NAB investigators can obtain this information via Unusual Activity Reports (UARs) submitted by vigilant staff members.

Demographic

These indicators relate to information that is collected about who the customer is (or claims to be) and the nature of their income and/or business activities. This also includes information on the parties connected to the customers. The bank holds vast amounts of data regarding customers' identification, addresses and businesses, and can screen customers against known past criminal activity.

Transactional

These indicators help to identify suspicious transactions and transaction patterns, using the millions of transaction records generated each day. Some indicators are built into automated detection scenarios, while others may be better identified through human judgment to consider whether a transaction profile is in line with the expected activity of the customer.

Jurisdictional

These indicators relate to information collected on customer demographics and transactional activity. This could include a customer's physical location, IP address or the flow of funds to or from a high-risk country. Jurisdictional risk will vary depending on the typology being investigated and whether a customer is perceived to be a victim or perpetrator.



Case Study: Child Exploitation

NAB has continuously been investigating typologies related to sexual facilitators to ensure AML/CTF obligations are met. Our financial crime exits team identified a trend in relation to customers transacting with merchants known for providing online advertising platforms for sexual services. These merchants were previously highlighted through investigations as potential indicators for illegal brothel and sexual exploitation typologies. The NAB investigations team established a set of behavioural and transactional indicators and reviewed data to understand NAB exposure and potential risk. NAB was able to differentiate between sex workers and facilitators through the investigation findings and took steps to respond to the issue. NAB prepared an internal intelligence report for internal stakeholders and the Fintel Alliance highlighting an emerging trend/typology.

In February 2022, Fintel Alliance published an industry-wide indicators paper, Detecting and Stopping Forced Sexual Servitude in Australia, with the indicators section largely based on NAB's initial findings.

Refer to the example is below:

A 17-year-old female, was identified to have received payment references from older males indicative of illicit drug activity, self-generated child sexual abuse material and prostitution such as 'massage' 'drug money', 'quickie', 'service', 'pic x' and 'deposit and content'. The juvenile had also received payments from a male who had been previously charged with child sex offences. Payments were also observed for single night accommodation with Airbnb, there were uber purchases and payments to two different mobile phone providers, which is indicative of a 'work' phone and a personal phone. In such instances, NAB follows its internal guidelines and legal obligations.

Case Study: Sextortion

Since 2022, the AFP-led Australian Centre to Counter Child Exploitation (ACCCE) has identified sextortion of minors as an emerging human impact threat in Australia. Offshore facilitators are targeting Australian minors, deceptively coercing them to self-produce sexually explicit content and then extorting money from them in return for not dispersing the material.


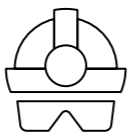


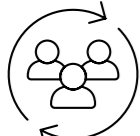





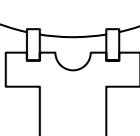
In early FY2024, NAB partnered with the ACCCE and developed a workflow to proactively detect suspected child sextortion payments in near real time.

The workflow enabled the ACCCE to proactively contact potential child victims quickly, to minimise the risk of self-harm. This initiative demonstrates the benefit of public private sector partnerships to help prevent crime which has detrimental impacts to children in our community. The NAB-ACCCE partnership is a great example of crime prevention, deterrence and victim support outcomes that can be achieved when law enforcement and industry collaborate in the national interest.



Examples of customer-related industry sectors and areas we have identified with higher potential for modern slavery risk include, but are not limited to, the industry sectors included in Figure 9.

Figure 9: Potentially high-risk industry sectors where modern slavery risk may be present in our customer base

POTENTIALLY HIGH-RISK INDUSTRY SECTORS	
 Agriculture and fishing	 Mining (particularly artisanal)
 Domestic and cleaning services	 Construction
 Contract labour	 ICT
 Adult & personal services	 Renewable energy (including solar, batteries and wind turbines)
 Hospitality	 High risk geographies
 Textiles	

Potential modern slavery risk exposure in our supply chain

The Group takes a risk-based approach to ESG risk assessment of its supply chain, including consideration of modern slavery risk. This helps us to identify and update potential areas where the Group could be exposed to modern slavery and human trafficking risks.

The key areas identified and focused on to date include:

- i. office consumables such as tea, coffee, sugar, cocoa for kitchens;
- ii. cleaning services, employed by building owners or facilities managers for buildings occupied by NAB;
- iii. corporate clothing;
- iv. print and promotional goods and services;
- v. construction;
- vi. Information and Communications Technology (ICT) – hardware; and
- vii. renewable energy (including solar and renewable energy purchase).

The Group undertakes ongoing review of its supply chain to understand the potential for exposure to modern slavery risk due to the industries in which our suppliers operate. The outcome of our FY2024 review confirmed that the sectors listed in ‘i.’ to ‘vii.’ above continue to be the key areas of the supply chain which have high potential to expose the Group to modern slavery and human trafficking risks (see Figure 9). In addition, through a risk assessment conducted in FY2024, three additional supplier sectors with high inherent exposure to modern slavery supply chain risk were identified and incorporated into our management of modern slavery-related risk. These additional supplier sectors were identified through updated stakeholder engagement, research and review of data published by external sources¹⁸ and included ‘accommodation and hospitality’, ‘security services’ and ‘vehicle fleet’.

Further information on how we manage risk of exposure for our suppliers, as well as a summary of our approach to human rights risk assessment, is available in *Mandatory criterion 4: Supply chain management and Investigating and managing potential instances of supplier-related modern slavery and human trafficking (the process)* sections below.

¹⁸ One of the key sources of external information included information published by the Office of the NSW Anti-slavery Commissioner.



Actions taken to assess and address modern slavery risk, including due diligence and remediation processes

(Mandatory Criterion 4)

The Group began integrating consideration of modern slavery into its frameworks, policies, systems and processes in 2016, following the introduction of the UK Modern Slavery Act, to enable the Group to assess and address modern slavery and human trafficking related risks. The Group regularly looks for opportunities to improve its understanding and management of modern slavery and human trafficking-related risk.

In FY2024, NAB undertook a human rights risk assessment as part of reviewing and refreshing its understanding of where and how human rights risks, including modern slavery risks, could arise.

NAB combined aspects of Shift's¹⁹ *Identifying and Prioritising Human Rights Risks* framework²⁰ with NAB's own risk management practices and processes to conduct its human rights risk assessment and identify potential for human rights risks to people. NAB then applied the insights from this assessment to inform the potential risk of human rights impacts to NAB. The insights from this review will be a key input to review and refresh of the Group Human Rights Policy planned for FY2025.

The key actions the Group undertakes to assess and address modern slavery risk have been grouped into the following areas:

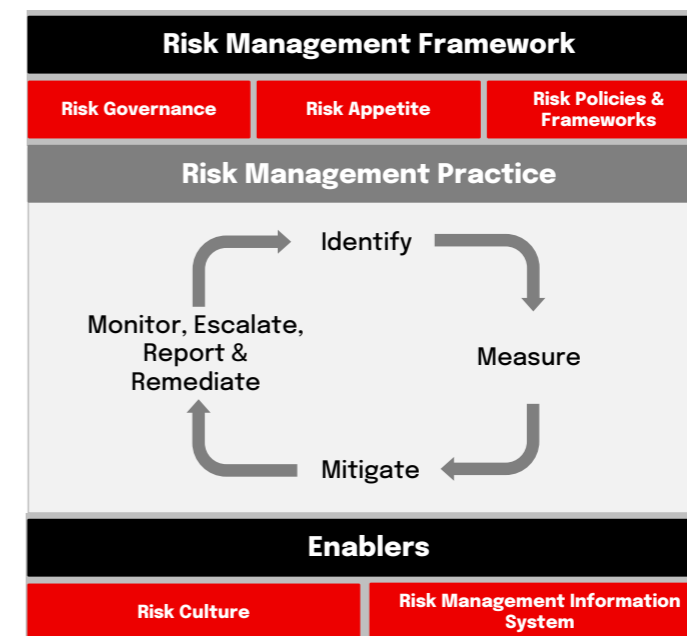
- **Risk management** – A description of the Group's approach to human rights risk management which includes consideration of modern slavery and human trafficking risk.
- **Supply chain management** – A summary of the Group's supply chain management practices and activities to address and assess modern slavery risk.
- **Financing/ Wealth** – A description of the approach to managing modern slavery in the Group's financing and wealth-related activities.
- **Ongoing Customer Due Diligence** – Information about transaction monitoring activities to detect and help prevent modern slavery associated with use of the Group's products and services.
- **Identification and investigation of modern slavery instances** – A description of the actions taken by the Group when potential modern slavery or human trafficking activities are identified.

- **Grievances/complaints** – An overview of grievance, complaints and feedback processes, which also provide a channel for external stakeholders to raise concerns about suspected instances of modern slavery.
- **Training and communication** – Actions taken to educate colleagues on modern slavery risk.

Risk Management

The Group understands that ESG risks, including modern slavery risks, relating to both customers and suppliers will vary depending on their industry, geographic location (country) and company size. The Group regularly reviews how it incorporates ESG risk into its risk management framework (see Figure 10), appetite, policies, practices and processes, at both a Group and Divisional level. This is supported by ongoing work to embed ESG risk considerations into day-to-day decision making and to refine processes and tools for managing ESG risk, including modern slavery and human rights related concerns, guided by our Group-wide ESG Risk Principles.

Figure 10: Risk Management Framework



¹⁹ Shift is a non-for-profit organisation recognised as the leading centre of expertise on the UN Guiding Principles on Business and Human Rights.

²⁰ As informed by the *Business and Human Rights: Identifying and Prioritizing Human Rights Risks* report, published January 2014.



ESG risks are identified, measured, monitored, reported and overseen in accordance with the Group’s Risk Management Strategy (RMS) and Risk Management Framework (RMF) and reflected in the Group Risk Appetite Statement (RAS) and relevant supporting divisional credit appetite strategies, ESG-related policies and management practices. Executive management’s GCMRC oversees Sustainability risk, which is a material risk category, defined as “the risk that ESG events or conditions negatively impact the risk and return profile, value or reputation of the Group or its customers and suppliers”. This includes human rights, modern slavery and human trafficking-related risk, as a significant part of the Group’s exposure to these risks is through lending to customers.

The RAS explicitly incorporates consideration of human rights and modern slavery. ESG risks are considered in the Group’s risk appetite and risk management framework, including within the Group’s customer-related ESG and supply chain-related policies and risk assessment processes. Modern slavery risk is considered as a part of social risk. Colleagues are expected to consider and, where relevant, address these ESG risks in their everyday activities.

Modern slavery risk is considered as a part of social risk. Colleagues are expected to consider and, where relevant, address these ESG risks in their everyday activities.

Updates on ESG risk are provided to the ERCC, BRCC and Board as appropriate. The GCMRC provides oversight of Sustainability Risk, including oversight of ESG-related matters, such as human rights and modern slavery related risk appetite and management, policies and performance. GCMRC’s remit includes risk appetite, risk profile, limits, portfolio exposures, relevant policies and compliance with ESG-related obligations (including human rights regulatory requirements, voluntary initiatives, goals and targets). When necessary, GCMRC escalates ESG-related risks to the ERCC and/or BRCC and/or Board.

Policies

The Group believes that customers, colleagues and members of the community should be treated with dignity, fairness and respect in accordance with the Codes of Conduct that apply to employees of the Group and the [Group Human Rights Policy](#).

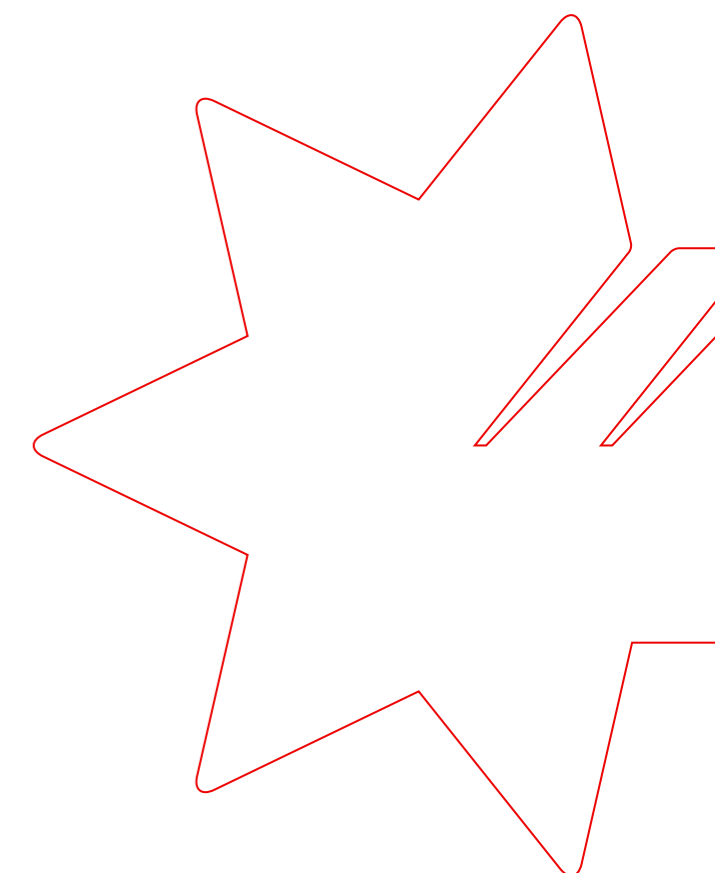
A commitment to respecting human rights is a core foundation for our Group Human Rights Policy, the approach to ‘How we work’, and our codes of conduct. It is also integrated within a number of key voluntary initiatives to which NAB is a signatory, including the Principles for Responsible Banking and the United Nations Global Compact (UNGC).

The [Group Human Rights Policy](#) (which includes consideration of modern slavery) is approved by the Board. It states that the Group does not tolerate slavery, human trafficking, forced or child labour, or child exploitation. In addition to the Group Human Rights Policy, the Group has various other policies and principles which incorporate requirements to manage human rights risk (including modern slavery risk). These include the following:

- Group Procurement Policy
- Group Outsourcing Policy
- Group Assessing Customer-related ESG Risk Policy
- Group Equator Principles Policy
- [Group Whistleblower Policy](#)
- [Group Supplier Sustainability Principles](#)
- Group AML/CTF Program
- NAB ESG Risk Principles
- [NAB Code of Conduct](#)

In addition to adhering to Group policies and processes, BNZ maintains the BNZ ESG Policy and BNZ Code of Conduct, which reflects the size and structure of BNZ’s separate banking business and local regulatory requirements. The BNZ ESG Policy contains requirements related to human rights, including modern slavery.

Additionally, wealth-related Group entities have standalone ESG and/or responsible investment policies (i.e. [BNZ Responsible Investment Policy](#) and [JBWere Responsible Investment Policy and Framework](#))²¹. These policies focus on management of ESG factors, including human rights and modern slavery, that are applicable to their investments and wealth-related activities.



²¹ Refer to *Introduction and Reporting Entities (Mandatory Criterion 1)* section page 2 for further details outlining the sale of BNZISL.



Due diligence

The Group performs a due diligence process for assessing human rights risk, including modern slavery risk in five key areas:

- Colleagues
- Supplier
- Customer (credit related)
- Customer (financial crime related)
- Financial Crime

Due diligence is also undertaken when responding to grievances received through NAB's grievances@nab.com.au mailbox.

The Group's human rights approach, which includes information about the external guidance we draw on and how we manage human rights risks, is outlined on our website [here](#) and our Human Rights Due Diligence Process is available [here](#).

Colleagues

In providing financial services, the Group employs a professional, largely adult, workforce where the risk of modern slavery is low.²² All employees are employed in compliance with local labour laws, including meeting any requirements in relation to child labour. Some of the Group's employees are immigrants or skilled workers holding work visas, and similarly are employed in compliance with local labour laws and in accordance with the relevant jurisdiction's immigration criteria.

Temporary staffing agencies are used from time to time to provide resources to assist with a range of banking and administrative functions. In Australia, these labour suppliers have contracted terms and conditions requiring compliance to local legislation and the Group's own Sustainability Principles. Where the Group operates in Australian States which have labour hire licencing laws, the Group only uses licenced labour hire companies. In New Zealand, BNZ also has contractual terms and conditions for its labour suppliers that require

compliance to local legislation. In India and Vietnam, labour suppliers are contractually required to comply both with local legislation and NAB Group expectations, including in relation to modern slavery.

NAB is committed to recognising and rewarding colleagues with fairness, equity, and transparency. A fixed reward and remuneration structure is successfully in place at NAB, providing colleagues with pay ranges in line with our 2024 enterprise agreement, which ensures that colleagues are paid more than the Banking and Finance Industry Award.

NAB is committed to recognising and rewarding colleagues with fairness, equity, and transparency.

These pay ranges have been established in consideration of the award, the minimum wage obligations in Australia and external market conditions. All colleague entitlements provided in the enterprise agreement are intended to satisfy the National Employment Standards (NES) in Australia, where any term of the enterprise agreement is less advantageous than the NES, the NES will apply. NAB is proud to currently be providing a minimum rate to its colleagues which exceed the Australian annual minimum wage by at least \$13,000.

In New Zealand, the Living Wage Movement Aotearoa New Zealand (LWMANZ) was formed in 2013 as an incorporated society by a group of non-government organisations in response to growing poverty and inequality in New Zealand to ensure all New Zealanders have access to a 'living wage'.

LWMANZ has also developed an accreditation system for employers who meet the criteria to become a Living Wage Employer. This is a trademark and cannot be used unless a licence has been signed committing a business to pay no less than the Living Wage to directly employed and contracted workers, delivering services on a regular and ongoing basis.

BNZ has been a Living Wage accredited employer (www.livingwage.org.nz) since July 2020. This means BNZ pays all its people a living wage and that all people who regularly undertake work on its premises and on behalf of the company, including suppliers, pay their people a living wage. As of 1 September 2024, the Living Wage is NZ\$27.80 per hour. The living wage allows people to pay for the necessities of life by ensuring they can cover expenses such as food, transportation, housing, and childcare and also live with dignity by providing for modest recreational activities and savings.

²² There are a small number of situations where minors are present in the workplace for short periods of time, for example when participating in work experience schemes.



Supply chain management

The Group understands that the conduct and performance of suppliers can have a significant impact on its modern slavery and human rights related risk exposure, in addition to broader ESG risk related concerns, as well as the Group's reputation within communities. The Group maintains risk management processes to identify, assess, mitigate and monitor these risks.

The Group has embedded management of ESG risks, including modern slavery and human trafficking, into its supply chain and third-party risk management (TPRM) processes. The procurement of most goods and services provided to the Group is managed via centralised Strategic Sourcing functions in Australia (for all Group entities in the jurisdiction). BNZ uses a different sourcing system but shares the same TPRM system with NAB. NAB offshore branches reflect the Australian process standard and align to their local requirements as needed.

Procurement and supplier management due diligence includes a risk-based ESG risk assessment within the selection process, when certain thresholds and risk indicators are triggered. Key suppliers are asked to sign up to the Group's [Group Supplier Sustainability Principles](#) or have equivalent policies and processes to manage their sustainability performance. The GSSPs outline the requirements suppliers are expected to meet to do business with the Group, including requirements in relation to labour practices and human rights.

Key suppliers are asked to sign-up to the Group's Group Supplier Sustainability Principles or have equivalent policies and processes to manage their sustainability performance.

Further, NAB's standard supply contract templates contain modern slavery clauses which require service providers to commit to not using forced labour, slavery or servitude and to having their own policies and procedures designed to ensure compliance with anti-slavery laws. Template clauses also include provisions to allow NAB to request evidence of suppliers' implementation of modern slavery risk management policies and processes.

Additional details about the Group's supply chain management processes (including the Group Supplier Sustainability Principles) are available [here](#).

To assess our suppliers' exposure to ESG-related risks, the Group undertakes a base level screening (incorporating adverse media monitoring) of new and significant renewals or changes of all supplier arrangements for ESG risk concerns, including human rights related, and assigns a preliminary inherent risk²³ rating for suppliers in high-risk countries and/or high-risk industries. As part of NAB's TPRM process and ESG risk management and supplier due diligence approach, material and selected other suppliers must answer a series of ESG-related questions, which include modern slavery questions. Where a potentially high ESG risk is identified through this process, the supplier is subject to an additional level of review.

For BNZ, third-party assessments (TPAs) are sent to all contracted third-party suppliers for completion. Due to New Zealand regulatory drivers (particularly Reserve Bank of New Zealand (RBNZ) BS11²⁴ policy changes in 2017), there has been no materiality threshold for risk assessing suppliers/contracts, and as such all new suppliers and contracts are subject to risk assessments. TPAs are completed for new suppliers before entering into a contract and at the time of significant changes for existing contracts.

The TPAs across the Group contain ESG risk assessment criteria, including modern slavery risk considerations. The Third-Party Risk Management team review the supplier's responses and request further information if required. Where a potentially high ESG risk is identified through this process, the supplier is subject to an additional level of review. Where required, additional mitigation actions are taken to address risks or issues identified. For all applicable suppliers, the outcome of the TPRM process, including residual risk rating, are reassessed periodically throughout the relationship with a supplier.

²³ An inherent risk is an assessed level of uncontrolled or untreated risk, or the innate level of risk inherent in a process or activity whereby there has been no actions undertaken, or controls in place, to reduce or mitigate the likelihood or severity of impacts of the risk being realised if a risk event occurs.

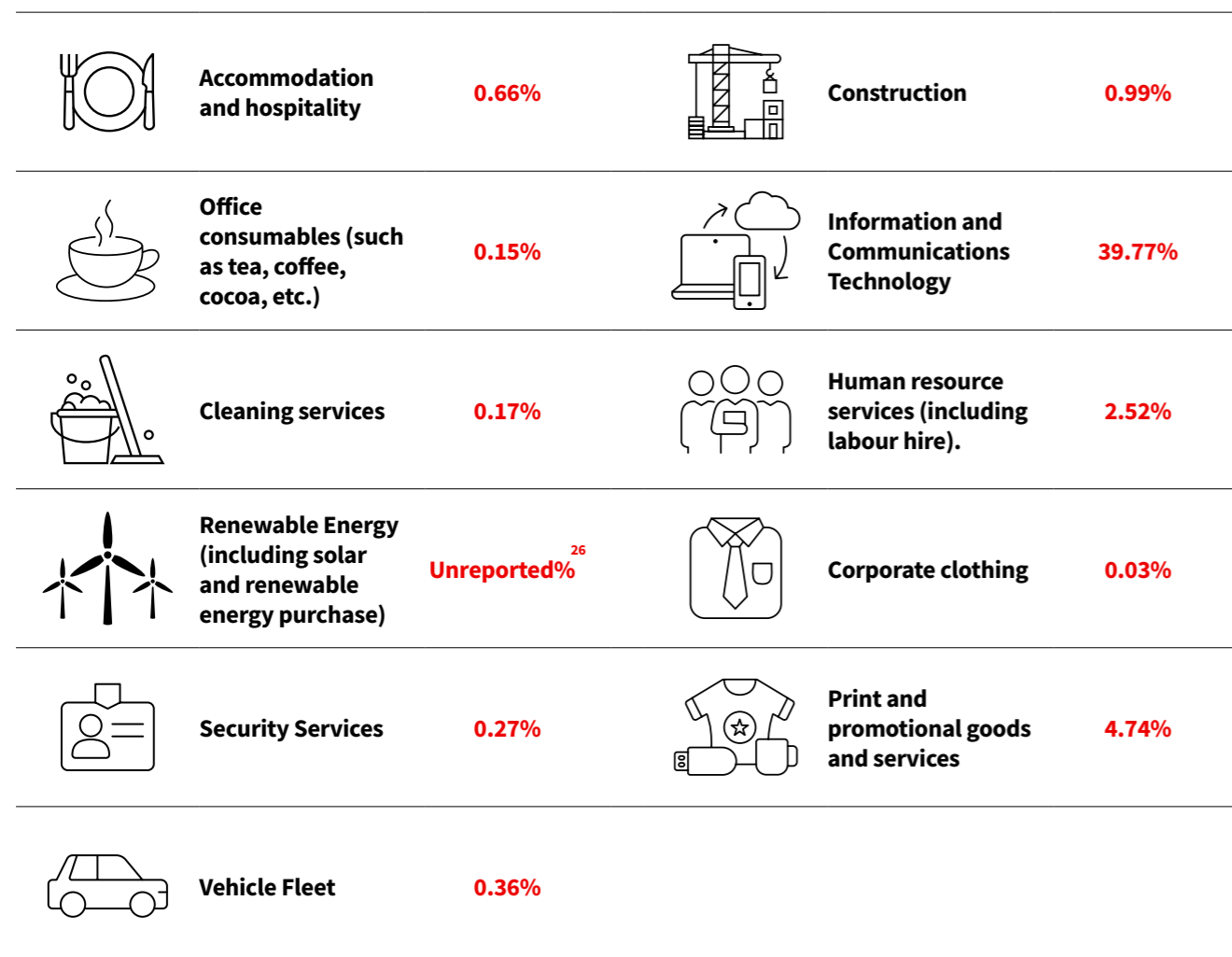
²⁴ BS11 is the RBNZ's Outsourcing Policy. The purpose of this document is to set out the RBNZ's policy for outsourcing by banks.



Investigating and managing potential instances of supplier-related modern slavery and human trafficking (the process)

In FY2024, in addition to identifying three new supplier-related high-risk industry sectors, the Group undertook a review of its supplier categorisation in its sourcing systems. Based on this review, we have been able to enhance our mapping of our inherently high-risk industries to supplier category codes in the applicable systems. The figure below reflects the value of procurement spend in sectors that have been identified as at potentially higher inherent risk of modern slavery.

Figure 11: Key inherent high-risk sourcing industry sectors for the Group (% total supplier spend)



In FY2024, we have estimated that approximately 49.7%,^{25,26} of procurement spend is in sectors that have been identified as potentially higher inherent risk of modern slavery, with ~2.96%,^{25,27} of this total being labour-related procurement (e.g. contingent labour, offshored business operations) where adequacy of labour practices is a consideration.

²⁵ Australia and New Zealand only.

²⁶ A percentage total supplier spend value has not been provided for renewable energy (including solar and renewable energy purchase). This is because this category has been newly identified as high risk, and the data for this category is not readily available at this time.

²⁷ Labour-related procurement figure excludes ICT related services as these overlap with ICT products and services.

Overall, our inherent high risk exposure estimate has increased on prior years as a result of the review activities undertaken during the year to better understand inherent modern slavery risk at a more granular sourcing category level. As a result of this work, we identified additional inherent risk exposure to sourcing activities associated with the ICT sector and three additional, but small, sourcing categories that have potentially high inherent modern slavery risk exposure²⁸.

When addressing potential risks or instances of modern slavery and human trafficking in our supply chain, depending on the situation, the Group will typically engage directly with a supplier, third-party or customer to better understand how they are managing their modern slavery risks. Following this engagement, the Group will take actions appropriate to the circumstances. These include, but are not limited to, adding relevant clauses to contracts, terminating an agreement where it is determined that the party is not managing their risk appropriately or, where a procurement contract has yet to be entered into, choosing a different supplier.

Additional actions undertaken within FY2024 to minimise the risk of modern slavery within the Group's supply chains included:

- **Continuing to enhance the TPRM onboarding process** used by NAB to more effectively identify, monitor, and manage risks (including modern slavery) involved in partnering with third parties (suppliers, consultants and other vendors). In FY2024, this included enhancing system functionality to improve the efficiency and effectiveness of the process for both a third-party providing their answers to the questions, and NAB's internal review and risk assessment of these responses.
- **Enhancing functionality within the TPRM system** that has been implemented across the Group. This better automates tracking of responses to ESG related questions and provides for creation and monitoring of action plans and ensures global consistency with current Sourcing processes.
- **Continuing to purchase Fairtrade** certified tea, coffee and cocoa across NAB's commercial building tea points and Fairtrade certified tea and coffee across BNZ commercial building tea points.

NAB is also currently in the process of implementing CPS 230²⁹, which will involve further upgrades to NAB's third-party assessment system and processes over the coming year. This will include supplier mapping of our Tier 1 and Tier 2 material suppliers and upload into our Governance, Risk and Compliance Engine (GRACE) and development of enhanced processes to contract, map and manage material suppliers and their reliant material service providers. This will ultimately allow increased visibility to NAB's fourth-party suppliers (i.e. suppliers to NAB's suppliers) and extend the reach of ESG risk management.

²⁸ The three additional inherent high risk exposure categories identified in FY2024 were 'accommodation and hospitality', 'security services' and 'vehicle fleet'. Please refer to *Risk of exposure to modern slavery (Mandatory criterion 3) section Potential modern slavery risk exposure in our supply chain* on page 12 for further information.

²⁹ CPS 230 refers to Prudential Standard CPS 230 Operational Risk Management, which comes into force on 01 July 2025. CPS 230 aims to ensure that an APRA-regulated entity is resilient to operational risk and disruptions and will replace five existing outsourcing and business continuity standards.



Customer Management

Colleagues in customer-facing roles identify and manage ESG risks, as part of their day-to-day responsibilities. They are supported by colleagues with specialist expertise and understanding of ESG risks who work in Group functions and subsidiaries. For example, by our ESG Risk Management, Legal and Sustainability teams and colleagues with sustainability-related roles embedded in teams within other areas.

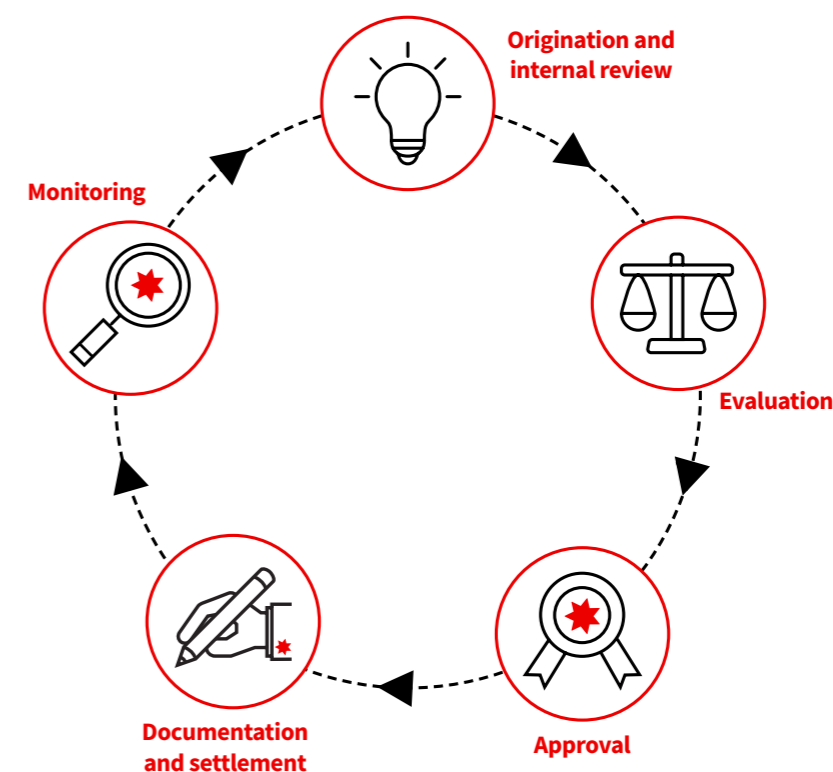
The Group considers exposure to risk, including ESG risk, at a lending portfolio and individual customer level. The Group performs a risk-based screening of customers to determine whether they are in a high ESG risk-related sector or undertaking activities which may have high associated ESG risk.

Financing-related activities NAB and BNZ Business Banking and Corporate and Institutional Banking Divisions apply a risk-based approach to consider exposure to ESG risk, including modern slavery and human rights risk. Colleagues in these areas regularly look for opportunities to enhance our ESG risk management processes, which includes how we identify, assess, mitigate and monitor potential risk areas where the Group could cause or contribute to negative ESG-related impacts. In addition to customer risk screening activities, the following process is followed to assess ESG risk considerations in more detail, appropriate to the relevant sector, business activity and geography.

If the Group identifies ESG risk issues as part of its initial customer screening, or notes involvement in high-risk sectors or activities, customers are then subject to a more detailed ESG risk assessment.

Consideration of ESG risk in the Group credit risk assessment and due diligence process occurs as follows, appropriate to the relevant sector, business activity and geography (Steps 1 to 5: see Figure 12 and descriptions below).

Figure 12: The Group’s credit risk assessment and due diligence processes include the following steps, appropriate to the relevant sector, business activity and geography



Origination and internal review – As part of the credit risk assessment and due diligence process NAB and BNZ Business Banking and Corporate and Institutional Banking Divisions are required to undertake negative media screening on customers at origination, internal review and where appropriate, when changes occur in customers facilities, for example when refinancing. If potential ESG risk issues, including modern slavery related issues, are identified as part of this risk-based screening, or Bankers note involvement in high-risk sectors or activities, then customers are subject to more detailed ESG risk assessment and due diligence. The more detailed assessment is undertaken in accordance with exposure-related trigger thresholds and ESG-related policy requirements, as part of the Group’s origination or ongoing credit review processes.

Evaluation – Detailed credit risk assessment and due diligence is conducted. This includes assessment and identification of material risk issues, incorporating ESG risks, where relevant. ESG-related checklists and guidance notes on a range of topics and sensitive sectors help guide this activity. This may include assessing a potential customer’s



background, character, ESG-related performance and the countries in which they operate. An example of the tools available to support the identification of modern slavery risk is the Group’s modern slavery risk matrix, which has been internally developed and is used to highlight high risk countries and industries/activities and help bankers identify where modern slavery risk is more likely to arise.

Where lending is project-related, we also apply the Equator Principles (EP)³⁰. The EP provide an environmental and social risk management framework. EP member banks throughout the world agree to only finance projects that are managed by the borrower with responsible business practices (both environmental and social) and which meet and comply with the EP, as applicable, depending upon the project categorisation. For further information on the EP, refer to the [EP website](#).

In FY2024, NAB reviewed and refreshed its ESG Risk Checklists, updating questions in areas addressing human rights and modern slavery, climate strategy and risk management, and nature-related risk to name a few. NAB’s Corporate and Institutional Banking team also developed a digitised version of the ESG Risk Checklists used by that Division, with input from NAB’s Risk and Client Management & Execution teams. A pilot of this new format for ESG risk assessment commenced in late FY2024. Moving to a digitised format will assist capture of customer-related ESG data to enhance both customer and portfolio level ESG risk assessment. For BNZ, a review and update to ESG guidance, checklists and processes has also taken place and been rolled out to frontline Corporate and Institutional Banking colleagues.

Approval – Lending approval is given where risk (including ESG risk, where appropriate) has been effectively evaluated, appropriately mitigated and accepted. In certain instances, where there is high ESG or reputational risk, matters are escalated to the relevant divisional and/or executive forums, BRCC and/or Board as appropriate.

Documentation and Settlement – During documentation and settlement the customer may be subject to conditions and covenants to address legal obligations, any voluntary compliance obligations (for example, the Equator Principles), and/or to monitor and manage specified ESG risks against agreed performance measures. This includes consideration of ESG performance KPIs when sustainability-linked products are involved.

Customer Engagement and Monitoring – Where ESG risk issues have been identified, ongoing customer relationship management includes engagement with customers to discuss their ESG-related performance, issues and initiatives. This engagement helps us to assess customer’s ESG performance and to better understand their ESG goals and objectives so we can support them with appropriate products and services and manage ESG and reputational risk that may arise as a result of the customer relationship. It also includes regular review of the customer’s compliance with any agreed conditions and covenants with ESG-related requirements. If there is evidence of systemic non-compliance or material issues, this may result in termination of the relationship, if it is not addressed or remediated to an extent NAB or BNZ is able to accept.

Further ESG risk assessment involves working through a series of questions in an ESG Risk Checklist to understand the ESG risk-related performance and issues related to a customer. This includes, but is not limited to, consideration of questions related to the following areas, including modern slavery:

Table 5: Examples of ESG issues that may be considered, as appropriate, in the ESG assessment process

Environmental risk areas/issues	Social risk areas/issues	Governance areas/issues
<ul style="list-style-type: none"> Climate change including just transition³¹, where relevant Transition planning Biodiversity and ecosystem impacts Water scarcity and quality 	<ul style="list-style-type: none"> Human rights, including: Modern slavery Labour practices Occupational health & safety Free, prior and informed consent Animal welfare Ethical sourcing & procurement Product safety and quality 	<ul style="list-style-type: none"> Corporate governance Money laundering Bribery & corruption Compliance Corporate conduct

For certain sectors, where specific ESG-related factors need to be considered, bankers have access to specific sector-based ESG questions and guidance to help understand and assess these issues relevant ESG risk issues.

³⁰ The Equator Principles are a set of guidelines through which participating banks throughout the world agree to only finance projects that are managed by the borrower with responsible business practices (both environmental and social) and which meet and comply with the Equator Principles.

³¹ A ‘just transition’ is one in which those communities bearing the impact of low-carbon policies need a fair and socially equitable transition. Definition adopted from the [United Nations Global Compact Network Australia](#).



Case Study: Business & Private Bank – Modern Slavery in the Agricultural Sector

The Australian economy relies heavily on seasonal and migrant labour, especially in the agricultural sector. A range of unions, academics, and human rights focused non-government organisations and the NSW Anti-Slavery Commissioner have raised concerns about potential for modern slavery in the Australian agricultural sector.

In 2018 the Fair Work Ombudsman's inquiry in workplace practices in the agricultural sector found evidence of illegal labour hire arrangements and misuse of piece rates. Concerns have also been raised in Senate hearings about occurrences of unsafe conditions and indentured labour relating to use of Pacific seasonal workers.

These issues present human rights risks NAB considers, where appropriate, when undertaking its credit risk assessment and due diligence processes. ESG risk assessment of customers forms part of these processes and involves consideration of customers' ESG-related performance and how they are managing ESG risk, including human rights, in accordance with exposure-related trigger thresholds and ESG-related policy requirements.

Our ESG risk assessment has identified some instances of poor labour practices related to use of labour hire companies. Where risks like these have been identified, ongoing customer relationship management includes engagement with customers to discuss their ESG-related performance, issues and initiatives.

If there is evidence of systemic non-compliance or material ESG performance issues, including those relating to human rights, this may result in termination of the customer relationship if these issues are not addressed.

Wealth-related activities

Within the Group, two key businesses (JBWere and BNZ) conduct wealth-related activities. Both have processes in place to assess and address modern slavery risk.

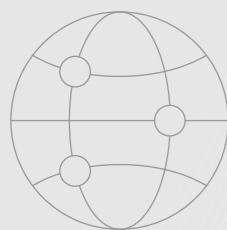
BNZ's [Responsible Investment Policy](#)³² provides for ongoing monitoring of modern slavery risks in BNZ's investment funds. BNZ is committed to ensuring that its appointed active managers are considering modern slavery risk in their investment decision-making processes, and that sufficient engagement is undertaken by all its managers with investee companies on this issue. Active fund managers are also required to:

- Report on quarterly engagement, including instances of engagement undertaken and outcomes achieved as a consequence of the engagement.
- Provide regular attestation that ESG-related risks are considered as part of their investment decision-making process.

JBWere recognises that it has an important and privileged role to play in Responsible Investment and helping interested clients to invest responsibly.

Based on the principles of providing clients with a comprehensive approach to responsible investing focused on dual objectives: performance and purpose, JBWere has captured its proprietary Responsible Investment framework in its [Responsible Investment Policy](#) (RIP). The RIP represents the full scope of responsible investment as defined by JBWere, spanning ESG integration, stewardship of client capital, impact investing, and ethical filters and alignment. Collectively these pillars are informed by globally recognised definitions of responsible investment developed by the Global Sustainable Investment Alliance (GSIA), as well as guidance developed by the Principles for Responsible Investment guidelines. They also reflect global best practice in private wealth.

³² Refer to *Introduction and Reporting Entities (Mandatory Criterion 1)* section page 2 for further details outlining the sale of BNZISL.



JBWere's approach to Modern Slavery Risk is outlined per asset class

JBWere is taking action to manage modern slavery-related risk across the range of asset classes.

JBWere Domestic / International Equities:

The JBWere domestic equity research and selection process takes into consideration a number of ESG risk factors, including an assessment of modern slavery risk. The JBWere domestic equities modern slavery risk assessment process includes a review of each potential investee company's Modern Slavery Statement, or other corporate disclosures related to corporate governance, human rights and/or labour relations. Where no primary source Modern Slavery Statement is available, the process utilises MSCI ESG scores associated with labour relations and a review of MSCI ESG controversies data for evidence of increased modern slavery risk. The JBWere domestic equities team conducts its own assessment of the modern slavery risk associated with each potential investee company and includes that assessment within the company's overall Governance score.

The JBWere international equity research and selection process considers modern slavery risk when reviewing candidate stocks. The international equity research team reviews the company's modern slavery statement (where this exists) or other corporate disclosures, as well as reviewing MSCI ESG controversies data for evidence of increased modern slavery risk.

Fixed Income:

For JBWere, identified modern slavery risks are captured in an issuer's MSCI ESG score and issuer credit rating. The team also monitors modern slavery risks through debt investor updates and leverages the credit ratings and analysis of recognised rating agencies such as Standard & Poor's and Moody's on the basis that the level of ratings assigned to an issuer and its debt instruments captures the ESG risks associated with that issuer. The identification and assessment of the ESG factors relevant to a debt issuer

feeds directly into any recommendation as to whether or not a JBWere client should buy, hold or sell a bond or hybrid issued by an issuer. In addition, the assessment of modern slavery risks as part of the broader ESG risk assessment relevant to a particular debt issuer also has a direct bearing on the value JBWere assigns to any debt instrument of that issuer.

Alternative Investments and Investment Fund Research:

ESG is a key factor that has been integrated throughout both of JBWere's Alternative Investments and the Investment Funds Research teams' due diligence process. As part of this process, both teams assess whether an investment manager adheres to Australian modern slavery legislation requirements, where applicable. If the legislation is not applicable to an investment manager, an assessment is undertaken as to the manager's ability to monitor and verify the supply chains of its portfolio holdings. This assessment forms part of the overall ESG/Responsible Investment rating applied to an investment product. Further verification of such assessments may also be obtained through independent, third-party data providers MSCI and Sustainalytics to analyse portfolio holdings for controversies relating to human and/or labour rights, as well as the supply chain.

The Responsible Investment team has undertaken a modern slavery risk analysis of JBWere's High Conviction List (HCL), which was completed in FY2024. This utilised the MSA questionnaire developed by the Responsible Investment Association of Australasia (RIAA) and JBWere's scoring framework. JBWere surveyed all fund managers managing funds included in the HCL and achieved a 100% response rate. JBWere also proactively engaged with any HCL fund managers where modern slavery gaps were identified to share findings and advocate for enhancements to the manager's modern slavery risk approach. This analysis forms part of JBWere's efforts to continually improve its understanding of modern slavery risk in asset classes in which it provides advice.



Ongoing Customer Due Diligence

Customers engaged in modern slavery may pose money laundering risks to the Group. For example, customers may launder the proceeds from slavery and cash activity associated with human trafficking through their bank accounts, or via banking products. The Group undertakes customer due diligence and transaction monitoring activities to identify, manage and mitigate the risk that its products and services might be used to launder money or fund terrorism. These activities may identify modern slavery activity by customers of the Group and require appropriate responses.

The Group's financial crime teams in Australia and New Zealand carry out:

- Enhanced Customer Due Diligence (ECDD) investigations on customers deemed to be high risk of money laundering or terrorism financing.
- Account monitoring using a range of human impact and money laundering scenarios that may indicate modern slavery.

Financial crime analysts are provided with briefings, training, thematic reviews and typologies material related to human exploitation when new and relevant material is available. Typologies include labour hire exploitation and human trafficking and modern slavery practices such as servitude, forced labour, forced or servile marriage, debt bondage and the exploitation of children.

Use of mule accounts to facilitate modern slavery

Modern slavery is a serious predicate offence of money laundering, the proceeds of which are often laundered via mule accounts. A predicate offence is a crime that is a component of a more complex criminal activity. It is the underlying criminal act, for example modern slavery, that generates proceeds or funds for subsequent illegal activity such as money laundering.

Mule accounts primarily involve deceptive or fraudulent use of the financial system, through bank accounts, to hide illicit gains. In many cases, mule accounts are managed through individuals who may be deceived into participation or who knowingly assist criminal networks. Some people, such as those recruited online with

promises of easy income, may unknowingly become “mules”³³ and unknowingly aid in financial crimes. More commonly, mule accounts are set up because of identity theft in the name of an unknowing individual whose details have been compromised. In these circumstances, criminal organisations have full control of the accounts and do not require the involvement of a third-party to conduct financial crime activities.

In some circumstances, individuals or victims of modern slavery can also be forced to act as ‘mules’ and engage in financial crime activities, where illicit funds are subsequently transferred through mule accounts under the control of criminal organisations engaging in modern slavery.

NAB is working in partnership with key law enforcements agencies and NGOs to detect and address the risks associated with mule accounts and modern slavery.

In addition to activities undertaken by financial crime teams, the Group has a number of additional processes which help to identify potential instances of modern slavery and/or human trafficking in its operations and value chain:

- KYC and due diligence processes may identify concerns that require follow-up in relation to the Group's value chain (supply chain, third-parties and customer relationships).
- Colleagues are trained to escalate concerns they may have in relation to modern slavery, in addition to financial crime related activity, via the submission of an Unusual Activity Report (UAR) which is then reviewed and investigated by the financial crime teams.
- Concerns may also be raised by colleagues or suppliers via the Group's Whistleblower hotline. In this case, the concern would be reviewed by the Whistleblower team in conjunction with the Group's Risk team to determine the appropriate course of action.

³³ AUSTRAC defines a money mule is someone who transfers or moves illegally-acquired money on behalf of someone else.



Investigating and managing potential instances of customer-related modern slavery and human trafficking (the process)

The Group's financial crime teams in Australia and New Zealand:

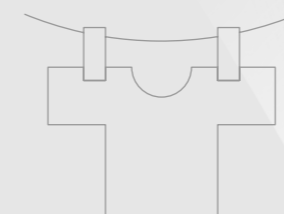
Investigate suspected cases of human exploitation identified through the monitoring they undertake.

Investigate unusual activity associated with products and services identified by Group colleagues (via UARs).

Provide training to bankers on the red flags that could indicate human exploitation.

Report to regulators and law enforcement as required on possible crime-related activity. In Australia Suspicious Matter Reports (SMR) are submitted to AUSTRAC, should the investigation find evidence of suspicious activity.

In New Zealand, BNZ reports Suspicious Activity Reports (SARs) to the NZ Police Financial Intelligence Unit (FIU). Further action may be taken, as appropriate, in addition to reporting to AUSTRAC or the FIU.



Case Study: Assessing customer-related ESG risk – Identifying potential modern slavery risk in a customer's supply chain

In February 2024, NAB was approached to refinance lending from another financial institution. The potential customer's supply chain entailed exposure to imported textile products. Due to their activities being in a high modern slavery risk industry, this prompted a more detailed ESG risk assessment, in accordance with our ESG risk policies and processes. Proposed lending exceeded the relevant exposure threshold and triggered the requirement for an ESG risk assessment.

An ESG Risk Checklist and our Modern Slavery Risk Matrix were key tools used to assist in completing this risk assessment. Through the risk assessment and due diligence process, it was identified that the customer's products were manufactured in jurisdictions also associated with a high risk of modern slavery in the potential customer's supply chain detected products sourced from another jurisdiction which has also been assessed by NAB as carrying a high risk of modern slavery.

The potential customer was appreciative of NAB explaining the issues with high modern slavery risk imported textile products in this jurisdiction, and as a result of this engagement, they are now transitioning to product suppliers in jurisdictions with decreased modern slavery risk exposure and enhancing their supply chain due diligence controls, among other measures. Before NAB was happy to proceed with onboarding this customer and provide lending, additional steps were undertaken to assess and understand the customer's ESG risk management and performance.

This risk included a site visit for key NAB personnel. NAB also agreed an approach to ongoing monitoring of this customer's ESG risks and performance with the customer.



Grievance and feedback mechanisms

The Group recognises that it is important to listen and respond to concerns raised by customers and other stakeholders on a wide range of issues, including human rights issues. The Group is committed to doing business in a responsible manner which includes how the Group manages its operations (including supply chain) and financing activities. Information is provided [here](#) on the Group's processes for receiving, investigating and addressing human rights grievances or concerns (including grievances related to modern slavery and human trafficking). Customers or other externally impacted third-parties can raise concerns or feedback by sending an email to the Group's dedicated email address (grievances@nab.com.au) with details of the issue. Guidance on how to raise a concern can be found in various languages, under the 'Guidance in other languages' tab found [here](#). The languages chosen for translation were based on:

- High risk countries defined in the Modern Slavery Index
- Countries associated with NAB's financing activities
- Non-English speaking languages in the countries in which NAB operates.

In addition, the Group has a [Whistleblower Protection Policy](#) and associated Group Whistleblower Program. NAB actively promotes a Speak Up culture aimed at allowing everyone to feel welcome, included and empowered to express views, opinions, and concerns. Our Group Whistleblower Program provides a safe and confidential channel that allows employees and contractors to the Group to raise concerns about potential wrongdoings. Concerns can be reported by contacting [KPMG's FairCall Service](#), which is an independently monitored external hotline and reporting service.

This channel is available for reporting modern slavery concerns. Grievances may also be received via social media, direct correspondence, or external bodies such as the Australian Human Rights Commission. Our Group Whistleblower Protection Policy outlines how to make a report, how we support and protect whistleblowers, and how reports are investigated. The Group Whistleblower Program is available to all employees (including directors, officers, employees, former employees, contractors, suppliers, subcontractors and agents of the Group) and subsidiaries across our operations.

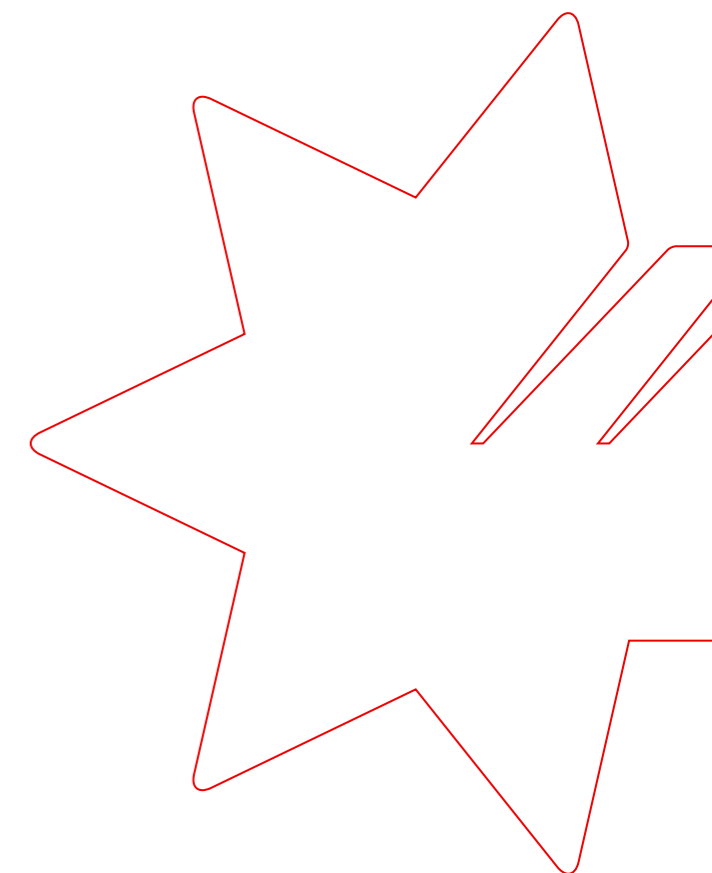
Where grievances or concerns are raised, each claim is investigated and addressed as appropriate. This may include engagement with customers and other stakeholders. As part of the investigation process, steps are taken to understand the issue(s) and take appropriate action. Appropriate action may involve referring the matter to the relevant authorities (in the case of suspicions or allegations of modern slavery) and/or engaging with the customer about areas of the organisation that the Group finances. If modern slavery is found to be occurring, remediation processes will need to be considered.

Training and communications

Modern slavery risk is considered with respect to the Group's value chain – being business operations (including customers and the Group's own operations), supply chain and third parties.

Colleagues undertake modern slavery training as part of annual Risk Awareness training. In FY2024, NAB achieved a 99.6% participant completion rate for Risk Awareness training. Annual Financial Crime refresher training, which had a 98.9% participant completion rate for NAB colleagues also included content on human impact crimes, including modern slavery. BNZ also incorporate modern slavery modules as part of their annual Risk Awareness training. In FY2024, BNZ achieved a 98.4% participant completion rate for this training.

In addition, throughout FY2024, individual members of the Modern Slavery Working Group participated in a number of engagement sessions with industry working groups. Please refer to *Mandatory criterion 7: Engagement in industry working groups and initiatives* for further details.





Assessing effectiveness of modern slavery risk management

(Mandatory Criterion 5)

The Group assesses the effectiveness of its modern slavery risk management through its ability to:

- detect and address modern slavery risk; and
- reduce exposure to modern slavery risk in its operations, or through exposure to third parties in the Group's value chain (customers, suppliers and other third parties).

A key part of the Group's approach to risk management is identifying accountable colleagues, assigning obligations to these colleagues and requiring controls to be in place to meet these obligations and test these controls.

Modern slavery risk management obligations are assigned to relevant accountable colleagues within business and customer facing areas across the Group.

These areas are required to have controls in place to ensure modern slavery risk is identified and managed in accordance with risk appetite, policies and procedures. This helps the Group to monitor the effectiveness of modern slavery risk management and controls.

Additionally, NAB conducts periodic risk review and challenge second line processes to confirm internal compliance with relevant risk appetite, policies and procedures and to ensure risk appetite and policy remains fit for purpose.

Current effectiveness measures include:

- Monitoring the number of modern slavery issues raised through the Group's grievance processes or identified through due diligence and transaction monitoring processes and ensuring that concerns identified are assessed, managed and mitigated appropriately. Refer to the *Identification of potential instances of modern slavery and human trafficking* section for more details.
- The number of colleagues who have completed annual Risk Awareness and Financial Crime training – which includes content covering modern slavery risk and human impact crimes respectively. This training takes place during the calendar year so not all colleagues have yet completed their 2024 training.

- The number of suppliers in high-risk sectors for modern slavery which have undergone enhanced risk review. The enhanced third-party risk management onboarding process discussed above will enable more effective identification and risk review of relevant suppliers.
- Delivery of year-on-year improvements to identify, address, mitigate and manage modern slavery and human trafficking risk.

The Group has a Modern Slavery Working Group ('Working Group') through which the Group's modern slavery risk management activities are coordinated across teams, including preparation of this Statement and disclosures on effectiveness measures. The Working Group includes members from business areas across the Group.

Identification of potential instances of modern slavery and human trafficking

In FY2024:

- There were no instances of modern slavery or human trafficking identified in direct association with the Group's own operations, or through sourcing-related risk assessments, including ESG risk assessments, in relation to the Group's supply chain.
- The Whistleblower Program received one report that triggered modern slavery concerns in FY2024. The report was investigated by NAB's Crime & Integrity Investigations team and it was determined that there was no evidence to support the concerns raised.
- There were no modern slavery and/or human trafficking concerns raised with the Group about customers through its feedback channels/grievance mechanism.
- NAB identified a number of instances of possible human exploitation by its customers that were investigated and reported to AUSTRAC and law enforcement where required. Further action was taken as appropriate.
- Similarly, in New Zealand, BNZ investigated several instances of possible human exploitation by its customers and reported these to the NZ Police FIU where required.
- The Group's ESG risk assessment processes (which form part of the credit risk and due diligence process), including media scanning, identified a small number of customers with possible modern slavery within their operations or supply chains. In most cases further investigation did not identify modern slavery, however in some instances, the Group has engaged with the customer and is monitoring the actions being undertaken to address the issues.



When a modern slavery or human trafficking concern is raised, the Group conducts any required investigations in accordance with regulatory requirements, policy and procedures, which may include reporting the matter to law enforcement. Further information is provided in the *Investigating and managing potential instances of modern slavery and human trafficking* section above.

Should a SMR be raised, this may also trigger ‘tipping off’ provisions in Australia under section 123 of *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth), which limits the Group’s ability to disclose information about reported matters. Modern slavery risks and impacts may also be raised and addressed indirectly through investigation of alternate risk factors, particularly those related to financial crime and labour practices.

Modern slavery risks and impacts may also be raised and addressed indirectly through investigation of alternate risk factors, particularly those related to financial crime and labour practices.



Case Study: Detecting modern slavery

In FY2024, NAB’s ESG Risk Management team received a referral from a banker seeking subject matter assistance and advice. The Banker provided the details about a prospective customer seeking funding for the purchase of a commercial property for the purposes of expanding their business.

When undertaking initial steps in the ESG risk assessment and due diligence process, the Banker became suspicious that the tenant renting the commercial property being looked at by the prospective customer, a massage parlour, may have been operating as an illegal brothel. ESG Risk Management colleagues assisted the Banker with further ESG risk assessment and due diligence and in this process, became suspicious that the tenant’s activities may also include child sexual exploitation, a form of modern slavery.

NAB’s processes and controls were implemented so as to manage the risk and comply with legal obligations.



Consultation on preparing a joint statement

(Mandatory Criterion 6)

Areas for delivery of risk management improvements in FY2024

Customer Risk Management: Corporate and Institutional Banking ESG Accelerate

In FY2024, NAB commenced development and testing ESG Accelerate, which is a new, digital tool designed to improve the efficiency and quality of the ESG risk assessment process undertaken by colleagues. ESG Accelerate integrates existing customer-related ESG risk checklists with an initial set of questions dynamically assigning relevant ESG content based on NAB's ESG's policies and related guidance notes. ESG Accelerate development includes questions to assist Bankers to identify and assess human rights risk, including modern slavery related risks.

The tool will help Bankers to better identify potential ESG risks, including modern slavery. NAB colleagues in Credit, Risk Strategy & Innovation are driving this initiative to simplify and strengthen the ESG risk assessment and due diligence process for Bankers and enhance ESG risk assessment and data capture at a customer and portfolio level. The Tool is currently in a pilot phase with 50 bankers. ESG Accelerate is intended to provide a streamlined process for bankers to assess and identify customer-related ESG risks, enhance understanding of ESG risks at a customer and portfolio level, and provide improved data capture and consistency which may be leveraged for further risk management process improvements over time.

Supplier Risk Management: inherent high-risk supplier industry mapping

The Group further enhanced its mapping of inherent modern slavery and human rights risk associated with procurement categories (please refer to *Mandatory criterion 4: Actions taken to address modern slavery risk, including due diligence and remediation – Supply chain management* section above). The objective of this enhancement is to improve the linkage and consistency between the two key sourcing/procurement systems used within NAB and to ensure NAB and BNZ sourcing categories and sourcing category and modern slavery risk settings are aligned. This will assist the supplier risk assessment process going forward.

During FY2024, the Group reviewed its related bodies corporate and Trusts and reconfirmed which entities were likely to trigger the consolidated revenue threshold for being a reporting entity under the Australian Modern Slavery Act during the period.

An engagement process was conducted with the Group entity Boards³⁴ (including reporting entity Boards) to ensure they were briefed on their accountabilities and informed of: (i) any relevant work under way to assess the potential for each entity to be exposed to modern slavery risk in its value chain (from suppliers through to customers), (ii) plans and progress related to modern slavery risk management across the Group, and (iii) key actions being undertaken to understand and manage modern slavery risk relevant to each entity's activities.

The Group's subsidiary engagement process occurs twice a year with each identified reporting entity Board (as per the list included in the introduction to this statement). Each of those reporting entity Boards in the Group has approved the preparation, and publication, of a joint statement on its behalf, being this statement. Engagement and consultation activities with other subsidiaries and entities owned and controlled by the Group also occur twice a year, to ensure they are aware of their modern slavery obligations through working group and Board meetings.

Additionally, NAB also engaged with relevant Trustees to agree that NAB would include relevant Trusts in the Group's joint Modern Slavery Statement.

³⁴ See list of reporting entities in NAB Group within Table 1 in the Introduction section at beginning of this Statement. An overview of activities undertaken by these entities is provided in Appendix 1: Reporting entity activity overview.



Other relevant information

(Mandatory Criterion 7)

COVID-19 Supplier Impacts

NAB has an international supply chain with key suppliers operating in locations that were subject to significant COVID-19 impact (e.g. India) in previous years. During FY2024, NAB has not identified, nor have any suppliers reported to NAB, any material ongoing impacts.

Engagement in industry working groups and initiatives

In FY2024, the Group participated in a range of industry-related working groups and initiatives to continue to grow its understanding and awareness of modern slavery and human trafficking risk, risk management options, grievance processes and cases. Engaging in industry working groups and forums enables us to exchange knowledge, learn from peer financial institutions and other corporates and to contribute to industry guidance in relation to human rights and modern slavery.

NAB attended the UNGC Human Rights Dialogue and members of the Modern Slavery Working Group also participated in Sustainability Professionals Association's inaugural roundtable event, which included speakers from the Attorney-General's Department, Walk Free and Fair Supply.

The Group also participated in a range of industry working groups, including the following:

- **Fintel Alliance** (an AUSTRAC initiative bringing together public and private sector participants to fight against money laundering, terrorism financing and other serious crime, including financial crime related to modern slavery).
- **Australian Banking Association Modern Slavery Working Group.**
- **Responsible Investment Association of Australasia (RIAA) Human Rights Working Group.**
- **Global Compact Network Australia.**
- **Australian Childhood Foundation.**
- **Clean Energy Council Risks of Modern Slavery Working Group.**
- **The New Zealand Financial Crime Prevention Network**, which brings together the NZ Police FIU, the New Zealand Customs Service and the five biggest banks in New Zealand in a public-private partnership aimed at reducing the harm caused by financial crime (including modern slavery).

The Group also engaged in conversations on modern slavery with not-for-profit organisations focused on the issue. This included:

- **Hagar International:** is a global Swiss-based humanitarian nonprofit organization offering services and assistance to people who have been exploited for sexual slavery and/or human trafficking.
- **Project Paradigm:** is a program of Integrated Family and Youth Service (IFYS). Project Paradigm deploys IFYS's national strategy which supports prevention, early intervention and community capacity building focused on protecting children and young people from harm through exploitation.
- **On Us:** the Australian Business Coalition for Safeguarding Children, an initiative of the Australian Childhood Foundation, supports businesses to ensure their products, services and operations do not cause harm to children and young people by providing businesses with best practice solutions to promote the safety and wellbeing of children and young people.

NAB has been actively involved in work that the International Centre for Missing and Exploited Children (ICMEC) has been undertaking in relation to Child Sexual Exploitation (CSE), including throughout FY2024. NAB currently chairs the Collaboration Working Group which is a forum that supports high-level discussions to occur with participating organisations and provides an opportunity to share typology and learnings to strengthen risk mitigation strategies to tackle CSE. NAB continues to proactively get involved in projects with ICMEC and partners to test various tools and systems that provide additional sources of intelligence. These systems and tools will enhance the understanding, identification, and detection of CSE. ICMEC has played a critical role in raising awareness of CSE across the various industry sectors and NAB will continue to support this important work.

This statement was approved by the Board of National Australia Bank Limited on 4 November 2024.

Signed

Andrew Irvine

Group Chief Executive Officer and Managing Director
4 November 2024



Appendix 1: Reporting entity activity overview

Entity Name	Description of reporting entity activities
National Australia Bank Limited (“NAB”)	The parent company, and main operating company, of the Group. The principal activities during the year were banking services, credit and access card facilities, leasing, housing and general finance, international banking, investment banking, wealth management services, funds management and custodian, trustee and nominee services.
National Equities Ltd (“NEL”)	Acts as a holding company for the major banking subsidiaries in the Group which are i) National Australia Group NZ (“NAG NZ”); and ii) Bank of New Zealand (which is a subsidiary of NAG NZ)
JBWere Limited (“JBWere”)	Provider of private wealth management services to high and ultra-high net worth clients including strategic financial advice, asset allocation, stock broking and portfolio management services. Operator of Investor Directed Portfolio Service.
Advantagedge Financial Services Holdings Pty Ltd (“AFSH”)	The holding company for the Advantagedge Financial Services business and is the residual income unit holder in structures that facilitate the funding of mortgages to third party brokers and managers. The company provides loans to corporates and/or for business purposes only.
Advantagedge Financial Services Pty Ltd (“AFS”)	Wholly owned subsidiary of Advantagedge Financial Services Holdings Pty Ltd. The principal activities of the Company are the wholesale origination of residential mortgages and provision of trust management and trust servicing activities.
86 400 Holdings Limited (“Holdings”)	Acts as a holding company for 86 400 Pty Ltd (“Proprietary Limited”) and 86 400 Technology Pty Ltd (“Technology”). Holdings is the service provider to NAB for operations of ubank and the employer of certain ubank employees. Proprietary Limited was formally the ADI for 86 400 business but had its ADI licence revoked in late 2021 following NAB’s acquisition of the 86 400 business. Proprietary Limited has a number of third party and supplier contracts (e.g., payments and marketing) to operate the ubank business. Technology owns the IP for the core customer experience engine technology for the ubank operating platform, as well as certain technology-related contracts.
National RMBS Trust 2008-2	An internal securitisation established for the purpose of issuing securities that can be used as collateral in order to obtain funding from the Reserve Bank of Australia via a repurchase agreement.

Entity Name	Description of reporting entity activities
National RMBS Trust 2012-1	An internal securitisation established for the purpose of issuing securities that can be used as collateral in order to obtain funding from the Reserve Bank of Australia via a repurchase agreement.
National RMBS Trust 2015-2	An internal securitisation established for the purpose of issuing securities that can be used as collateral in order to obtain funding from the Reserve Bank of Australia via a repurchase agreement.
National RMBS Trust 2023-1	An internal securitisation established for the purpose of issuing securities that can be used as collateral in order to obtain funding from the Reserve Bank of Australia via a repurchase agreement.
nab Covered Bonds Trust	The principal activities of the Trust are the acquisition, management and sale of mortgage receivables. These mortgage receivables support a guarantee provided by the Trust to the Trustee associated with the issue of covered bonds by NAB.

