



National Australia Bank

Code of Conduct.

Message from the Chief Executive Officer



At the National Australia Bank Group, we are committed to achieving sustainable performance and delivering value to our customers and shareholders while maintaining our beliefs, behaviours and trusted reputation.

You may also be expected to adhere to additional/ specialist Codes relevant to your particular role or line of Business. If you are unsure, speak with your people leader.

We are a financial services organisation providing products, advice and services through our major Australian franchise and businesses in the United Kingdom, New Zealand, the United States and Asia.

National Australia Bank maintains Codes of Conduct for all regions in which we operate. These Codes detail the standards of responsibility and ethical conduct required of every employee and everyone working on our behalf - including contractors, consultants and directors.

Consistent across all regions in which we operate are our Group commitments:

- We conduct ourselves professionally
- We act with honest, integrity and fairness
- We manage conflicts of interest
- We meet our legal and regulatory obligations, voluntary commitments and internal standards
- We adhere to confidentiality and privacy requirements
- We deal with and report on suspected breaches

All NAB Codes are underpinned by trust and a belief that employees and customers will be treated with respect and dignity. Suspected breaches of the Codes will be investigated. A breach may impact your conduct gate rating and result in disciplinary outcomes that may include termination of your employment with NAB.

You must become familiar with your Code. You are encouraged to study your Code and refer any questions you may have to your people leader.

Your Code is not a substitute for good judgement, nor does it cover every situation you may encounter. However, your Code contains the basic principles and standards you are required to apply in your work at NAB.

If you become aware of a breach of the Code, you must bring it to the attention of your people leader, Workplace Relations via the [People Advisory Centre](#) or contact the Group Whistleblower program via the [confidential alert line](#). If you make a report in good faith, you may do so without fear of reprisal. Where possible, we will protect your identity. A "good faith" report means that you have provided all of the information you have and you believe it to be true.

We are all responsible for ensuring compliance with our Codes.

Andrew Thorburn

Group Chief Executive Officer
National Australia Bank Limited

National Australia Bank Group commitments

We conduct ourselves professionally

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

We act with honesty, integrity and fairness

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

We manage conflicts of interest

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

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

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

We adhere to confidentiality and privacy requirements

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

We deal with and report on suspected breaches

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

Contents

Code of Conduct – Australia

We conduct ourselves professionally	5
1. Personal conduct	5
2. Use of information and information systems	6
3. Social media	7
4. Media discussions/publicity	7
We act with honesty, integrity and fairness	8
5. Honesty and integrity	8
6. Fairness	9
7. Prevention of fraud and corruption	9
We manage conflicts of interest	10
8. Conflicts of interest and relations with customers and/or third party providers	10
We meet our legal and regulatory obligations, voluntary commitments and internal standards	11
9. Complying with legal and regulatory obligations, voluntary commitments and internal standards	11
We adhere to confidentiality and privacy requirements	12
10. Market information	12
11. Confidentiality, access and disclosure	13
We deal with and report suspected breaches	14
12. Consequences of breaching the Code of Conduct	14
National Australia Bank Limited policy declaration	15

We conduct ourselves professionally

1. Personal conduct

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

At all times, both in and out of work:

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

Where to seek assistance

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

David's inappropriate behaviour

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

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

As a result of the incident, people leaders were also reminded of their responsibility to ensure alcohol is served in a responsible way and to deal with unacceptable behaviour immediately it arises.

Not "just a joke"

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

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

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

2. Use of information and information systems

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

We must never use these systems to:

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

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

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

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

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

Systems such as Outlook, SAP and Promaster have delegation functions which must be used when access by a colleague is required.

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

Inappropriate access using NAB's systems

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

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

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

Tiffany shares a joke

Tiffany received by email a joke with racist overtones and forwarded it on to five of her colleagues. One of her colleagues, Peter, found it offensive and advised his people leader.

The use of NAB's email system for this purpose was found to be a breach of the [Use of Information and Information Systems Standard](#) and Code of Conduct and the racist content a breach of NAB's [Group Discrimination and Harassment Policy](#).

Tiffany received a Red Conduct Gate, impacting her ability to participate in the relevant incentive plan.

3. Social media

While we encourage you to make appropriate use of social media, you must act lawfully and be transparent, responsible and respectful of us, our customers, your colleagues and everyone you interact with online. Unless specifically authorised to do so, you must not post on social media as a representative of NAB.

When using social media, you must:

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

Gareth vents on social media

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

In his posts, Gareth identified his employer as NAB.

This action was not in line with our [Social Media Guidelines](#) and breached our Code of Conduct, impacting his ability to participate in the relevant incentive plan.

Zara tries to help

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

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

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

4. Media discussions/publicity

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

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

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

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

We act with honesty, integrity and fairness

5. Honesty and integrity

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

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

If you make any business-related purchases, you must comply with NAB's [Australian Region Expense Management Policy](#) and any other relevant Business Unit Expense Management Policy.

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

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

- Your people leader
- [Workplace Relations](#) via the [People Advisory Centre](#)
- [Group Whistleblower Program](#) via the confidential alert line

Employees who make a good faith report of known or suspected misconduct will not be subject to reprisals and are protected under [NAB's Whistleblower Protection Policy](#).

Chloe amends NAB's systems

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

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

Aaron uses his corporate card for personal expenses

Aaron was running low on cash and needed to pick up some groceries on the way home. He used his corporate card to pay for the shopping, thinking it wouldn't be a problem as he would pay the money back at the end of the month.

Aaron was again short of cash in the following month and needed to pay some personal expenses. Aaron again used his corporate card to pay for personal expenses including his children's medical appointments, grooming for his pet and petrol for his car.

A review was completed of Aaron's expenses and it was found that he had used his corporate card for personal items. Aaron's employment was terminated for breaching our Group Expense Management Policy.

Jason is unwell

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

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

Jason's actions in falsifying a medical certificate were dishonest and in breach of NAB's Code of Conduct. It constituted serious misconduct and resulted in Jason's employment being terminated.

Pauline's expenses

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

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

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

6. Fairness

Fairness to our customers

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

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

You must not make representations to induce a customer to enter a transaction or do so without their approval.

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

Customer complaints must be handled with sensitivity and in a timely manner.

Fair competition

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

7. Prevention of fraud and corruption

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

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

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

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

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

Within our [Enterprise Risk Policy](#), our Financial Crimes requirements provide guidance on our responsibilities and processes.

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

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

Olivia prevents fraud

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

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

We manage conflicts of interest

8. Conflicts of interest and relations with customers and/or third party providers

NAB's commercial interests and your personal interests must never interfere with the ability to make sound, objective business decisions. You must understand and comply with our [Enterprise Risk Policy – Conflicts of Interest requirement](#) and the Conflict of Interest Standard. We must also ensure that our conduct in business ensures that we treat customers fairly and that we help safeguard market integrity.

Conflicts of interest

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

Conflicted remuneration

If you are responsible for giving financial product advice you must ensure you do not accept a benefit in circumstances that may cause NAB to breach our licence and regulatory obligations.

Participating in outside business interests and outside employment

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

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

Benefits, gifts and entertainment

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

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

Charitable donations

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

Political donations

You must obtain appropriate approval to make any financial donations or contributions to political parties in line with the [Group Political Contact, Communications and Donations Policy](#).

Colin's interests conflict

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

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

All expenses paid

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

After a thorough investigation, Jack received a Red Conduct Gate impacting his eligibility to participate in the relevant incentive plan. The acceptance of such a gift could be reasonably perceived as having the potential of unduly influencing or creating a business obligation.

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

Natalie's broking business

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

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

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

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

9. Complying with legal and regulatory obligations, voluntary commitments and internal standards

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

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

You must immediately report any suspected, potential or actual non-compliance to your people leader, divisional compliance team or the Whistle-blower and Confidential Alert Line.

Breaches may include:

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

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

We adhere to confidentiality and privacy requirements

10. Market information

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

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

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

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

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

This policy prohibits insider trading and includes black out periods before half and full year results. During these periods you or your immediate family are not permitted to trade in NAB securities.

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

William's inside information

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

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

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

11. Confidentiality, access and disclosure

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

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

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

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

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

NAB has made certain commitments to our customers and others to protect their personal information. These commitments are set out in NAB's [Enterprise Risk Policy – Privacy and Data Protection Standard](#).

You should familiarise yourself with this policy.

Emily shares information

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

Emily's employment was terminated after an investigation found that she had disclosed personal, [confidential information](#) to unauthorised persons in return for a financial benefit.

A footy fanatic

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

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

Sam's inappropriate access

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

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

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

We deal with and report on suspected breaches

12. Consequences of breaching the Code of Conduct

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

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

If these investigations reveal breaches, appropriate disciplinary and remedial action will be taken. This may range from providing training, coaching and counselling, through to formal warnings or termination of employment.

Any breach of the Code or our policies will be measured against the Employee Conduct Management Policy and may impact your performance review and any incentive payment to which you may have been entitled.

Each situation will be assessed in terms of the particular circumstances and facts. Appropriate action will be taken by NAB after consideration of all relevant details.

National Australia Bank Limited policy declaration

I, _____

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

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

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

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

Employee Number

Employee Name

Signed

 _____

Date

____ / ____ / ____

