2023 Equator Principles Report

1 October 2022 – 30 September 2023

About NAB

National Australia Bank Limited ("NAB") and its controlled entities ("Group") is a financial services organisation that provides a comprehensive and integrated range of banking and financial products and services. The Group has operations based in Australia, New Zealand, the United Kingdom, France, North America and Asia.

Financial year and currency

The Group's financial year ("FY") is the reporting period commencing 1 October and ending 30 September. All data in this report is as at 30 September 2023 and for the 2023 FY ("FY2023") unless otherwise stated. All references to currency are in Australian dollars unless explicitly stated.

About the Equator Principles

The Group became a signatory to the Equator Principles[1] ("EP") on 25 October 2007. The Group considers EP requirements when lending for specific projects.

NAB's portfolio of project-related financing

We're here to serve customers well and help our communities prosper. As a major bank, our business touches almost all areas of the Australian and New Zealand economies. The Group's portfolio of project-related financing plays an important role in supporting Australia and New Zealand's growth, as well as providing key infrastructure in other countries where the Group operates.

In FY2023:

- Project-related financing represented around 0.6% of total Group Exposure at Default ("EaD")[2] at 30 September 2023. Of this lending, 99% of projects were in designated countries[3] and 1% were in non-designated countries.
- The Group closed 7 new project-related transactions and 15 transactions were repaid.

Transactions can be declined at any stage in negotiation or due diligence. In FY2023, no transactions were declined specifically on the basis of social or environmental risks or issues.

Table 1: EP project-related finance portfolio: Transactions by EP Categories[4]

EP category	Number of projects	Projects as a % of total portfolio value
A	6	10
B	70	68
C	20	22
Total	**96**	**100**

Figure 1: EP project-related portfolio by region (% of total EP project-related portfolio exposure expressed as EaD as at 30 September 2023)

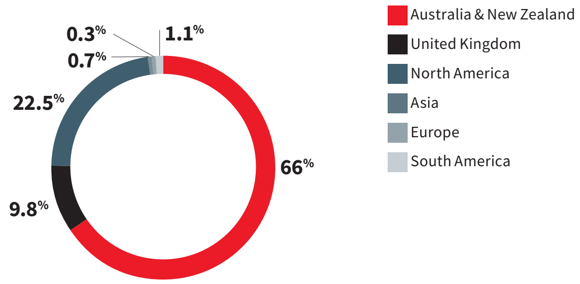
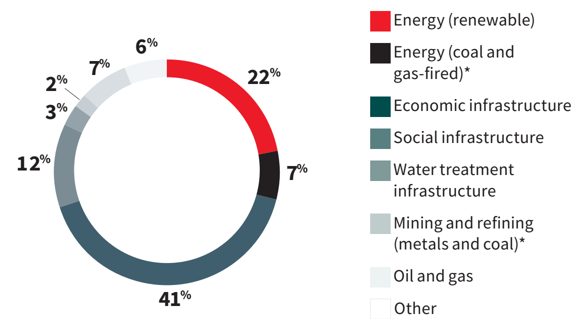


Figure 2: EP project-related portfolio finance by sector (% of total EP project-related portfolio exposure expressed as EaD as at 30 September 2023)



*As at 30 September 2023, EaD for Energy (coal and gas-fired) is all gas-fired. The Group's EP-related finance portfolio no longer contains coal-fired power generation projects. Within mining and refining, coal mining is around 1.4% (0.4% thermal coal; 1%metallurgical coal) of EP-related EaD.

The economic infrastructure segment of the project-related finance portfolio (as EaD) breaks down into the following key areas:

- Airports – 7%
- Communications, data and metering networks – 2%
- Pipelines & transmission assets – 8%
- Ports – 5%
- Rail – 8%
- Roads & tollways – 11%
- Terminals – 10%
- Other infrastructure – 50%

The social infrastructure segment of the project-related finance portfolio (as EaD) breaks down into the following key areas:

- Government buildings – 15%
- Hospitals and medical centres – 27%
- Schools – 11%
- Student accommodation – 10%
- Other – 36%

1 See http://www.equator-principles.com/ for more information, including the Equator Principles definition of project finance which is used by the Group.
2 EaD is a parameter used in the calculation of economic capital or regulatory capital under Basel II for a banking institution. It is the gross exposure under a lending facility upon default of a customer.
3 A list of designated countries is published by the Equator Principles Association here. Non-designated countries are those countries not found on the list.
4 The EP categorises projects into three categories. The categories are: Category A – Projects with potential significant adverse environmental and social risks and/ or impacts. Category B – Projects with potential limited adverse environmental and social risks and/or impacts. Category C – Projects with minimal or no adverse environmental and social risks and/or impacts.

Table 2: EP project-related finance portfolio by sector and by year (% of total Equator Principles project-related portfolio exposure expressed as EaD as at 30 September 2023). This financing is tagged as EP in NAB's system.

Sector	2023	2022
Energy (renewable)	22	18
Energy (coal and gas-fired)*	7	6
Economic infrastructure	41	41
Social infrastructure	12	17
Water treatment infrastructure	3	3
Mining and refining (metals and coal)*	2	5
Oil and gas	7	8
Other*	6	2

*As at 30 September 2023, EaD for Energy (coal and gas-fired) is all gas-fired. The Group's project finance portfolio no longer contains coal-fired power generation projects. Within mining and refining, thermal and metallurgical coal mining are 0.4% and 1% respectively of EaD. See page 24 of the Group's 2023 Climate Report for details about the Groups' coal and oil and gas ESG-related settings.

Project finance for energy infrastructure

A key aspect of our project-related financing is our support for renewable and low carbon assets and infrastructure. This supports execution of the Group's climate strategy, which is aligned to our strategic ambition. We acknowledge that climate change is a significant risk to the planet and a major challenge for society to address. Beyond this risk, there is a significant economic opportunity as the world transitions to a low-carbon future. The 2023 All Systems Go: Powering Ahead report, commissioned by the Group and produced by Deloitte Access Economics, modelled there is a $435bn economic opportunity to Australia's economy by 2050 from transforming its industrial base and establishing a clean energy platform to drive export growth in a rapidly decarbonising world.

As part of this, we are working with customers as they decarbonise, adapt and build resilience, while pursuing new climate opportunities for a prosperous future. The Group is connected to many parts of the economy through our lending and other banking activities and has an important role to play in financing the low-carbon transition.

Our role as a leading arranger of project finance and the number one Australian bank provider of project finance to the global renewable energy sector[5] is helping the Group's customers and communities make the low-carbon transition.

In FY23, the Group's financing for renewable energy assets represented a cumulative total generation capacity of 86,144 megawatts ("MW") (FY22: 40,446MW). An additional 45,698MW of installed renewable energy generation capacity was added to the portfolio in FY23. This included wind and solar assets in Australia, US and the UK.

In FY2023, the Group's estimated[6] share of total location-based Scope 1 and 2 greenhouse gas ("GHG") emissions associated with Australian designated[7] generation assets for which NAB provides project-related financing (and tagged as EP transactions in NAB's system) was 482,689 tonnes of carbon dioxide equivalent ("tCO_2-e"). This estimate is based on NAB's participation in financing for each facility as a percentage of debt as at 30 September 2023 (217,940 tCO_2-e in 2022[8]).

In FY2023, the Group provided $2.14 billion[9] (FY22: $1.25 billion) in financing for renewable energy assets, taking the cumulative value of financing provided for renewable energy assets since 2003 to $14.97 billion (FY22: $12.8 billion) (measured as committed debt at 30 September 2023).

The Group has adopted a whole-of-bank approach by developing sustainable product offerings across divisions to support customers to reduce their emissions. This is outlined in the Group's 2023 Climate Report, along with information about our sectoral decarbonization target setting to meet Net Zero Banking Alliance requirements and fulfil our goal to have a net zero lending portfolio by 2050. In 2023, NAB completed its work to assess the transition maturity for 100 of our largest GHG-emitting customers using a Transition Maturity Diagnostic, building on the work commenced in 2021. From 1 October 2025, NAB intends to require a Customer Transition Plan to be in place for new or renewed corporate lending or project-level lending[10] for Corporate and Institutional Banking customers in the following sectors[11]:

- Power generation, where at time of lending 25% or more of the electricity generated by the customer is from thermal coal.
- Oil and gas[12].
- Metallurgical coal.

Updates on implementation of the Group's climate change strategy are reported through to management, executive and the Board. Public disclosure is provided in the Group's 2023 Climate Report and the 2023 Annual Report (refer to 'Climate change and environment' section pages 37-42).

5 Data Source: Rankings based on IJGlobal League Table MLA, Renewables, both cumulative data from 1 Jan 2010 to 30 September 2023 and for the 12 months ending 30 September 2023.

6 As these GHG emissions are not generated directly by NAB, NAB has relied on public information disclosed by the Australian Clean Energy Regulator, which is information reported by designated generation facilities for the purpose of National Greenhouse and Energy Reporting. The methodology involved identifying the reported location-based Scope 1 and 2 GHG emissions associated with each generation facility NAB project financed in Australia. These were then multiplied by NAB's participation in financing for each facility as % of debt as at 30 September 2023. NAB's share of location-based Scope 1 and 2 GHG emissions were then aggregated to get the total tCO2-e for the portfolio of power generation assets NAB project financed in Australia.

7 Designated generation facilities are facilities where the principal activity is electricity generation and where the facility is not part of a vertically-integrated production process. The emissions figure calculated for NAB's project finance portfolio of Australian designated generation facilities covers 100% of the Australian power generation assets (measured as MW capacity of the power generation facilities) included in NAB's project finance portfolio.

8 The 2022 GHG number has been recalculated to match the methodology applied in 2023 reporting representing the total location-based Scope 1 and 2 greenhouse gas ("GHG") emissions associated with Australian designated generation assets for which NAB provides project-related financing (project finance and project-related corporate loans).

9 Amount includes new transactions and re-financing.

10 This includes lending at a corporate level (for example, general facilities made available to the parent company of a group of companies), or at a project-level (that is on an individual project basis for a specific project purpose), and subject to national energy security considerations.

11 Referenced sectors are consistent with sector definitions used for NAB's target setting emissions baseline, although metallurgical coal forms part of the iron and steel sector. Refer to Supporting information on page 71 of our 2023 Climate Report for further details. NAB does not intend to apply this requirement to customers in the thermal coal sector because NAB has set a target to reduce financed emissions for this sector to zero by 2030 (refer to page 44 of our 2023 Climate Report for further details).

12 This requirement for the oil and gas sector was previously communicated in NAB's 2022 Climate Report.

Project finance case studies

The Group provides finance for projects across a range of sectors. This year's project finance case studies feature examples of finance for a water treatment plant, a solar farm and a rail project. These case studies illustrate the Group's implementation of the EP.

Moving to net zero power in the US

The US has an ambitious goal of achieving a carbon pollution-free power sector by 2035 and a net zero emissions economy by no later than 2050. Development of renewable energy projects like solar plants are a key component of delivering on this goal.

In November 2022, NAB (acting through its New York Branch) was part of a syndicate with seven other banks providing finance to BOH Solar for the construction and operation of a portfolio of three US-based solar farms for Leeward Renewable Energy ("LRE", a 100%-owned subsidiary of the Ontario Municipal Employee Retirement System). The solar farms, which are located mainly on leased agricultural land, include: Big Plain Solar (196MW) in Ohio, Oak Trail Solar (100MW) in North Carolina and Horizon Solar (200MW) in Texas (collectively the "Project Portfolio") totalling 496MW of installed generation capacity. Big Plain and Oak Trail declared commercial operation in July 2023 and Horizon declared commercial operation in December 2023.

The Project Portfolio is expected to generate renewable energy for 30+ years. Verizon Communications Inc has contracted via Power Purchase Agreements to use the Project Portfolio's output for 15 years, as part of the goal to meet 50% of its energy needs from renewable sources by 2025 and reach carbon neutral status by 2035. The Project Portfolio is also expected to generate significant economic investment in local communities where the solar farms are located.

As part of NAB's due diligence and credit risk assessment for the project, NAB reviewed the arrangements in place to identify and manage environmental and social risks associated with the Project Portfolio. Environmental considerations included land use, noise, pollution, and discharges (during construction phase), effects on habitat and wildlife (resident and migratory) as well as visual impacts and physical climate risk (hail and flood events were key physical climate risks identified and being managed). Social considerations included Indigenous peoples and culture, other cultural resources (e.g. historic and/or archaeological sites) and stakeholder engagement. Due diligence also included independent external review by an appropriate consultancy. The due diligence confirmed that relevant ESG risks had been identified and would be appropriately managed. The Project Portfolio was evaluated against EP requirements and categorised as Category B.

NAB New York's due diligence and credit risk assessment also included review of the modern slavery risk associated with the thin-film photovoltaic (PV) modules as part of general ESG risk assessment. The PV modules to be used in construction were manufactured by a US company using thin-film cadmium telluride technology and assessed as being lower risk than other providers from a modern slavery risk perspective.

Modern slavery can be difficult to detect and is included as part of NAB's customer due diligence and engagement where country and industry risk suggest a higher likelihood of modern slavery risk may exist. After financial close, NAB's monitoring of this sector highlighted that the solar module provider had publicly reported that they had identified instances of migrant worker forced labour via audit of sub-contractors used in Malaysia. The solar module manufacturer has publicly stated that it is requiring the four subcontractors to change how they treat workers and agree to periodic reviews so the manufacturer can ensure that the sub-contractors are no longer using forced labour. The risk of modern slavery is a key ESG risk issue in the renewables sector that NAB continues to monitor.

Helping to provide water security in New Zealand

Cardrona Valley Water Treatment Plant (CVWTP) or the "Project" will be located in Otago in the South Island of New Zealand, southwest of Christchurch, and northwest of Dunedin. The Project is being developed by Mt Cardrona Station Limited (MCS) to support regional growth and development in the Cardrona region.

Cardona Village is currently serviced by five small private water supply schemes with water take consents. However, these schemes do not have capacity to meet future development and long-term demand. The new CVWTP will provide additional supply to enable development in accordance with the Queenstown Lakes District Council's (QLDC) Queenstown Lakes Spatial Plan through to 2050. NAB's New Zealand subsidiary, BNZ, was approached by MCS to help fund this project and is the sole provider of debt financing for the water treatment facilities.

The Project consists of two new water withdrawal sources (one on the Cardrona River and one on Pringles Creek), pumping stations, a raw water storage to buffer seasonal variations in raw water availability, a WTP (using standard membrane filtration and chlorination technology), rising and falling mains and a treated water storage reservoir. QLDC will provide the new water main to connect the WTP to Cardrona Village. Once complete, the Project will have capacity to provide 1,500m^3/day of treated drinking quality water and it will be able to be upgraded in the future to provide 2,000m^3/day; an upgrade not expected to be required until 2038. Once operational, the Project and the associated land use rights including easements, resource consents, and building consents will all vest into QLDC ownership.

As part of the due diligence and credit risk assessment for the project, BNZ undertook its own technical review, including a review of environmental and social requirements, of the project. This included consideration of discharge parameters, monitoring requirements and management planning related to water quality, dust, cultural heritage, noise, Greenhouse Gas Emissions emissions and waste. In addition, an independent consultant provided advice on the ecological value and impact on Project construction on the Cardrona River. The project was categorised as Category C.

Reducing road congestion through lower emissions transport

With a new airport being built in the Western suburbs of Sydney to meet future demand for aviation services and the rapid development of the Western Sydney region, the NSW and Federal Governments have commissioned a new rail project.

Parklife Metro consortium ("Parklife Metro") were awarded the Stations, Systems, Trains, Operations and Maintenance (SSTOM) contract for Sydney Metro – Western Sydney Airport. Sydney Metro – Western Sydney Airport is the new metro railway line which will service Greater Western Sydney and the new Western Sydney International (Nancy-Bird Walton) Airport. A city-shaping project, the 23-kilometre new railway will connect the Western Sydney Aerotropolis in the south with St Marys in the north – where customers can connect to the existing Sydney Trains suburban T1 Western Line.

The NSW and Australian governments have a shared objective of having Sydney Metro – Western Sydney Airport operational when the airport opens for passenger services.

The city-shaping project, from St Marys through to the new airport and the Western Sydney Aerotropolis (located at the new Bradfield City Centre), will provide economic stimulus for western Sydney, supporting more than 14,000 jobs during construction for the NSW and national economies.

Once operational, the new metro line is expected to carry up to 7,740 passengers per hour in each direction and is set to reduce traffic by removing approximately 110,000 vehicles from the roads by 2056.

In December 2022, a Public Private Partnership (PPP) contract in New South Wales was awarded to Parklife Metro for the SSTOM works.

Parklife Metro will deliver:

- Six new stations – St Marys, Orchard Hills, Luddenham, Airport Business Park, Airport Terminal and the new Aerotropolis
- 12 new metro trains
- Core rail systems
- The Stabling and Maintenance Facility to be built at Orchard Hills.

Parklife Metro will also operate and maintain the line and its assets for 15 years after it becomes operational.

The Sydney Metro Western Sydney Airport is the first Australian rail infrastructure project to commit to being certified carbon neutral from start of construction, all the way through to operations.

As part of NAB's due diligence and credit risk assessment of the project, a range of environmental and social aspects were considered, including the project's environmental approvals and management plans, biodiversity assessments, noise controls, waste disposal, water management, contamination risk, cultural heritage (Indigenous and European), human rights, climate risk and stakeholder engagement processes. The project was evaluated against EP requirements and classified as Category B.

The Group's FY2023 EP Compliance Data

The total number of project-related transactions that triggered the EP, were tagged as EP in NAB's system and reached financial close[13] in FY2023 was seven.

In accordance with the EP Version IV ("EP IV")[14] reporting requirements, Table 3 provides a breakdown of the Group's relevant EP data by sector, region, country type and whether an independent review has been carried out during FY2023. These transactions are tagged in NAB's system as EP transactions.

Table 3: Project finance data for transactions triggering EPs in FY2023

	Breakdown by Category		
	A	B	C
Project finance transactions tagged in NAB Group's system as triggering the EP during the period 1 October 2022 to 30 September 2023.	1	3	2
By Sector	**A**	**B**	**C**
Energy (gas-fired)	0	0	0
Energy (renewable)	0	2	0
Oil & Gas	0	0	0
Infrastructure (road, rail, airports, ports, pipelines, and telecommunication)	0	1	1
Social Infrastructure (schools, hospitals, prisons, and public buildings)	0	0	0
Infrastructure (water)	0	0	1
Mining and refining	0	0	0
Infrastructure (Nitrogen-based fertiliser)	1	0	0
By Region	**A**	**B**	**C**
Americas	0	2	0
Europe, Middle East & Africa	0	0	1
Asia Pacific	1	1	1
By Country Type	**A**	**B**	**C**
Designated	1	3	2
Non-designated	0	0	0
Independent Review [15]	**A**	**B**	**C**
Yes	1	3	1
No	0	0	1

In addition, there was one project-related corporate loan, and no refinance transactions or acquisition transactions which triggered the EP. The Group does not provide project-related advisory services.

Table 5 shows a breakdown of the Group's relevant EP data by sector, region, country type and whether an independent review has been carried out during FY2023 for the project-related corporate loan. This transaction has been tagged in NAB's system as an EP transaction.

Table 5: Project-related Corporate Loan data for transactions triggering EP in FY2023

	Breakdown by Category		
	A	B	C
Project-related Corporate Loan transactions tagged in NAB Group's system as triggering the EP during the period 1 October 2022 to 30 September 2023.	0	1	0
By Sector	**A**	**B**	**C**
Energy (gas-fired)	0	0	0
Energy (renewable)	0	1	0
Oil & Gas	0	0	0
Infrastructure (road, rail, airports, ports, pipelines, and telecommunication)	0	0	0
Social Infrastructure (schools, hospitals, prisons, and public buildings)	0	0	0
Infrastructure (water)	0	0	0
Mining and refining	0	0	0
Infrastructure (waste management)	0	0	0
By Region	**A**	**B**	**C**
Americas	0	0	0
Europe, Middle East & Africa	0	1	0
Asia Pacific	0	0	0
By Country Type	**A**	**B**	**C**
Designated	0	1	0
Non-designated	0	0	0
Independent Review [16]	**A**	**B**	**C**
Yes	0	1	0
No	0	0	0

In accordance with the reporting requirements of EP IV, Table 4 provides project name reporting for EP transactions which reached financial close in FY2023.

13 Defined in the EP as "the date on which all conditions precedent to initial drawing of the debt have been satisfied or waived".
14 EP IV came into effect on 1 October 2020 and have been applied to projects and data in this report which covers the FY2023 reporting year – 1 October 2022 to 30 September 2023.
15 Conducted in accordance with Principle 7 – Independent Review.
16 Conducted in accordance with Principle 7 – Independent Review.

Table 4: Project-related project name reporting*

Project Name	Calendar Year	Sector	Host Country	Type of Finance
Cardrona Valley Water Treatment Plant	2022	Infrastructure (water)	New Zealand	Project Finance
Sydney Metro - Western Sydney Airport	2022	Infrastructure (railways)	Australia	Project Finance
BOH Solar	2023	Energy (renewable)	USA	Project Finance
Double Black Diamond	2023	Energy (renewable)	USA	Project Finance
Perdaman Urea Project	2023	Other (nitrogen-based fertiliser)	Australia	Project Finance
Vantage Data Centres LHR21	2023	Infrastructure (telecommunications)	UK	Project Finance
Project Verdant	2023	Energy (renewable)	UK	Project-related Corporate Loan

* Subsequent to publication of NAB's 2023 Sustainability Data Pack (SDP), one additional EP transaction (Sydney Metro - Western Sydney Airport) was included in NAB's reporting to the EP Association, therefore the list of project names reported here differs from the one presented in NAB's FY23 SDP.

EP implementation

The Group recognises that businesses today operate in an environment which includes many environmental and social challenges that affect our economy and society. These include issues such as human rights, climate change, biodiversity loss, ecosystem degradation and impacts on local and Indigenous communities. To assist in managing these issues, the Group has a set of ESG Risk Principles which provide an overarching framework for integrating ESG risk considerations into the Group's day-to-day decision-making.

The Group considers exposure to ESG risk at both a lending portfolio and an individual client level. At the individual client level, ESG risk is assessed on a case-by-case basis as part of the credit risk assessment and due diligence process. This includes an assessment of ESG risks associated with particular sectors.

In addition to the Group's general ESG risk policies and practices, the Group has specific policy requirements that address implementation of the EP. During the credit risk assessment process for corporate and institutional lending, it is the Group's practice to identify potential project finance and corporate finance transactions where the EP could apply. The Group's EP Policy reflects EP IV requirements.

For relevant project and corporate finance transactions, tailored due diligence is undertaken as required by the Group's general credit policies and the Group's EP and ESG Risk policies. This includes categorisation (A, B or C) of projects.

Relevant transactions that trigger EP requirements are tagged in NAB's system as being EP transactions for reporting and risk management purposes. This also facilitates follow-up with customers to ensure they are meeting EP requirements.

The Group's Corporate & Institutional banking (C&IB) client facing teams originate project-related financing, including project finance and corporate-related lending. These origination teams are supported by Client Management and Execution ("CME"), Credit Decisioning and ESG Risk Management ("ESGRM") teams. The ESGRM team provides Environmental, Social and Governance ("ESG") and EP subject matter expertise.

The relevant origination team will typically agree the technical, environmental and social scope of work, the requirements for site visits during the due diligence process, and the selection of independent experts/consultants as part of their preparatory work on a transaction. The extent of NAB's or Bank of New Zealand's (BNZ) involvement in scoping the environmental and social due diligence requirements will vary with NAB's or BNZ's role in a syndicate (whether we have a lead role or not) and the type of transaction/finance involved.

Independent environmental and social experts may be used to assist the origination teams, where applicable, and in accordance with the EP.

Where there are potentially controversial issues or significant ESG risks associated with a potential project finance transaction, the ESGRM team may also review material relevant to a transaction after referral from the origination deal team, CME or Credit team.

As project-related lending usually involves a syndicate of banks, it is the Group's general experience that there is usually consensus reached among the bank group on the project category assignment, and in most cases, a conservative approach is taken.

When potential projects occur in non-designated countries (defined in EP IV), this includes applying IFC Performance Standards[17]. Standards 5 (Land Acquisition and Involuntary Resettlement) and 7 (Indigenous Peoples) are particularly relevant when reviewing how the Group's clients are managing land rights, Indigenous rights and the associated impacts on local communities.

Loan documentation covenants are reviewed by the relevant transaction team, and where appropriate, NAB or BNZ legal teams. Standard facility agreements typically contain covenants sufficient to satisfy the EP covenant requirements – where necessary these are amended on a case-by-case basis.

The transaction team tracks a project's compliance with the EP. This includes seeking client consent for Project Name reporting. Client consent requests are tracked, recorded and held in a central location.

17 Refer to: https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance-Standards

Monitoring ongoing EP compliance

At a minimum, the Group undertakes an annual review of every EP transaction. This may include site visits by the relevant transaction team (and may also include Credit and ESGRM colleagues) and independent monitoring where necessary (generally during construction and operations for complex and/or Category A projects).

The Group also requires the client to provide reports on general construction and operational compliance. The frequency and scope of this reporting is based on the risk associated with a project – for example, it may be monthly, quarterly, half-yearly or annually. A higher risk project typically requires more frequent reporting so the Group can monitor that it is being developed in accordance with project approvals, project documents and any additional requirements of the relevant Group transaction team.

Reporting to management

The Group's executive committee and board of directors receive reports on the Group's lending book exposure to a list of industry sectors with potentially higher ESG risk sensitivities (as designated by the Group internally), such as mining and energy generation. This reporting includes project-related lending. The Group also monitors the carbon intensity of its project finance energy generation portfolio and has publicly disclosed interim decarbonisation targets for priority sectors developed to satisfy the requirements as part of the Group's membership of the Net Zero Banking Alliance.

Training

In FY2023, the ESG Risk Management Team, in collaboration with the C&IB business unit Training, Change and Client Management and Execution teams conducted EP training which included updates to Policy and Guidance for relevant C&IB colleagues on EP implementation. This covered scope of application, project categorisation and other EP requirements.

Reporting methodology

The Group produces data and provides case studies to meet EP reporting requirements associated with Principle 10 and to demonstrate implementation of the EP. The EP data published in this report represents the Group's identified EP-related portfolio managed by the C&IB business unit and BNZ. The EP portfolio data is validated and reconciled through interviews and data checks with colleagues across NAB's offices in Australia, New York and London and BNZ in New Zealand. The Group's EP portfolio is segmented in a variety of ways to produce the data.

Assurance over EP data

In FY24, KPMG provided limited assurance over selected information in NAB's Equator Principles Report for the year ended September 2023. KPMG's assurance report can be located here.

Further information on the Equator Principles can be found at **www.equator-principles.com**.