

# Green Bond Framework

December 2025



national  
australia  
bank



This Framework is applied to instruments issued by National Australia Bank Limited ABN 12 004 044 937 ('NAB') or its related entities<sup>1</sup> which align to one or more of the Climate Bond Standard (CBS) of the Climate Bonds Initiative (CBI) and the International Capital Market Association (ICMA) Green Bond Principles<sup>2</sup>.

The Australian Sustainable Finance Institute (ASFI) Taxonomy (ASFI Taxonomy) was released in June 2025. NAB is an ASFI Member, was engaged with the development of the ASFI Taxonomy and may seek to include the ASFI Taxonomy as an additional screening mechanism for identification of eligible Use of Proceeds for Green Bond issuance.

1 Excludes Bank of New Zealand and National Australia Bank Europe S.A (NAB Europe)

2 Issuance under this Framework may be on the basis of past, current or future versions of the CBS and/or GBP, as specified in the terms of any such issuance.

# NAB's strategic ambition

NAB's strategic ambition is to be the most customer-centric company in Australia and New Zealand, where customers trust us and choose us to be their bank, and where colleagues are customer-obsessed and proud to work at NAB.

This ambition elevates existing components of the strategy, with a deep focus on:

- **Relationship-led** with exceptional bankers providing unrivalled customer service and personalised and proactive experiences.
- **Exceptional experiences** where NAB is brilliant at the basics; trusted in moments that matter; and is simple, fast, and easy to deal with.
- **Safe and sustainable** with a strong balance sheet and proactive risk management; secure, simple and resilient technology; and a long-term and sustainable approach.

Further information about NAB strategy can be found in NAB's [Annual Reporting Suite](#).

# Climate strategy

NAB's climate strategy supports this ambition. Climate change is a significant risk to the planet and a major challenge for society to address. Beyond this risk, there is an immense economic opportunity as the world transitions to a low-carbon future.

Our priority is working with customers as they decarbonise, adapt and build resilience, while pursuing new climate opportunities for a prosperous future.

NAB's climate action-related activities, including progress on our climate strategy and how we are supporting our customers to decarbonise and to build resilience, are detailed in [NAB's Climate Report](#).

Further information about NAB's broader sustainability performance, including governance, strategy, risk management and metrics can be found in NAB's [Annual Reporting Suite](#).

# NAB Green Bond Framework

NAB Green Bonds provide an opportunity for investors to direct capital towards projects and assets or other related expenditures that may contribute towards the objectives of the Paris Agreement<sup>3</sup> or may address environmental challenges including pollution reduction and control, reducing biodiversity loss and ecosystem degradation, improving water security and the development of a circular economy.

NAB Green Bonds may also support and contribute towards meeting the United Nations Sustainable Development Goals ('SDGs').

This Framework describes the processes to support NAB's Green Bond Issuance, in the following areas:

- a. Use of Proceeds
- b. Process for Evaluation and Selection of Eligible Projects and Assets
- c. Management of Proceeds
- d. Reporting
- e. External Review and Assurance

NAB Green Bonds may include unsecured, senior or subordinated "use of proceeds" bonds, asset-backed and residential mortgage-backed securities and covered bonds issued by NAB or its related entities<sup>4</sup>.

The Framework satisfies the requirements for Programmatic Certification of NAB Green Bonds under the Climate Bonds Standard.

The Framework replaces previous frameworks and applies to future issuance of NAB Green Bonds and NAB Green Bonds currently outstanding.

The Framework is approved in accordance with NAB's corporate governance framework, is subject to periodic review and supported by NAB's internal processes and controls.

<sup>3</sup> The Paris Agreement is an international treaty on climate change. It entered into force on 4 November 2016 with an overarching goal to limit global warming to well below 2°C above pre-industrial levels and pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels. The Australian Government is party to this agreement.

<sup>4</sup> Excluding Bank of New Zealand and NAB Europe

# Use of Proceeds

NAB will allocate an amount equivalent to the net proceeds of each NAB Green Bond towards financing, or refinancing, a portfolio of projects, assets and other expenditures which satisfy one or more of the following:

- Eligibility requirements of the Climate Bonds Standard Sector Criteria; and
- Alignment with the eligible project categories of the ICMA Green Bond Principles.



The projects, assets and expenditures may also support and contribute towards meeting the UN SDGs.








For Climate Bonds Standard-certified NAB Green Bonds, the amount equivalent to the net proceeds of each bond will be allocated only against projects, assets and expenditures that meet the eligibility requirements of Climate Bonds Standard Sector Criteria.








In order to identify projects, assets and expenditures which support and contribute towards the SDGs, NAB has utilised guidance and resources published by the [United Nations Principles for Responsible Investment](#) ('UNPRI'), the ICMA Green Bond Principles and the [SDI Asset Owner Platform](#). This may be supplemented by the use of Australian Taxonomy as an additional screening mechanism or other relevant guidelines where available and relevant.

Relevant details of projects, assets and other expenditures included in the NAB Green Bond portfolio will be provided in NAB's annual Green Bond Report, subject to confidentiality obligations and availability of information.

The table below sets out the Climate Bonds Standard Sector Criteria and the relevant eligible project categories of the ICMA Green Bond Principles, along with alignment and contribution towards the relevant UN SDGs. It reflects those standards and principles published as at the date of this Framework, which may be amended or updated from time to time.

| GBP Eligible Green Project Categories | CBS Sector Criteria   | Eligible Green Project Examples  | UN SDG Alignment  |
|---------------------------------------|---|--|---|
| <b>Renewable energy</b>               | <u><b>Solar Energy</b></u><br><u><b>Wind Energy</b></u><br><u><b>Marine Renewable Energy</b></u><br><u><b>Geothermal Energy</b></u><br><u><b>Bioenergy</b></u><br><u><b>Hydropower</b></u><br><u><b>Electrical grids and storage</b></u><br><u><b>Hydrogen Production</b></u> | <ul style="list-style-type: none"> <li>• Onshore solar electricity and solar thermal generation facilities.</li> <li>• Onshore wind generation facilities.</li> <li>• Offshore wind and solar, wave power and tidal power generation facilities.</li> <li>• Geothermal electricity generation facilities with direct emissions of less than 100gCO<sub>2</sub>/kWh and geothermal projects that have been reviewed and registered under the Clean Development Mechanism.</li> <li>• Facilities producing biomass/biofuel, heating/cooling and co-generation facilities using biofuel/biomass and bio-refinery facilities.</li> <li>• Small hydropower generation facilities limited to a maximum capacity of 25MW and new large scale hydropower generation facilities with reservoir power density greater than 10W/m<sup>2</sup>.</li> <li>• Manufacturing facilities, research and development dedicated to renewable energy generation, technology and equipment including green hydrogen.</li> <li>• Transmission and distribution supporting infrastructure for renewable energy.</li> <li>• Energy distribution, management, control and storage systems for renewable energy including inverters, storage and control systems.</li> <li>• Distributed assets required for construction or upgrading of Transmission &amp; Distribution infrastructure to reduce curtailment of renewable energy into the grid.</li> <li>• Information and Communication Technology (ICT) and smart grid applications including controls, smart meters and supporting technology.</li> <li>• Electricity storage including batteries, large scale energy storage facilities and their manufacturing facilities.</li> <li>• Hydrogen production facilities, decarbonisation measures within facilities producing hydrogen (e.g. retrofits) and hydrogen delivery projects i.e., eligible assets, projects and entities relating to the production, conditioning, conversion, transportation, and storage of hydrogen as detailed within the Hydrogen sector criteria.</li> </ul> | <div> <b>7</b> AFFORDABLE AND CLEAN ENERGY<br/>  </div> <div> <b>9</b> INDUSTRY, INNOVATION AND INFRASTRUCTURE<br/>  </div> |

| GBP Eligible Green Project Categories   | CBS Sector Criteria   | Eligible Green Project Examples   | UN SDG Alignment   |
|---|---|---|--|
| Energy efficiency   | <b><u>Basic Chemicals</u></b>   | <ul style="list-style-type: none"> <li>Development of products or technologies that deliver material reductions (30%) in energy consumption of underlying assets, technology, product or systems including chiller enhancements, improvements in refrigeration, energy efficiency products, appliances and equipment, LED and energy efficient lighting, fuel cells and smart meters.</li> <li>Assets, projects and companies relating to the production of eligible organic and inorganic basic chemicals.</li> <li>Industrial and commercial energy efficiency improvements that deliver a material reduction (30%) in energy consumption.</li> <li>District heating using at least 50% renewable energy, as defined in the Renewable Energy category.</li> </ul>   | <div>11 SUSTAINABLE CITIES AND COMMUNITIES</div>  <div>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</div>   |
| Pollution prevention and control  | <b><u>Waste management</u></b><br><b><u>Cement</u></b><br><b><u>Steel</u></b>                       | <ul style="list-style-type: none"> <li>Facilities that contribute to reduction of air emissions, GHG (Greenhouse Gas) control, soil remediation, waste prevention, waste reduction, waste collection, waste recycling and sorting, waste storage, composting, anaerobic digestion, landfill gas recovery, energy-efficient waste to energy projects.</li> <li>Subject to meeting the eligibility requirements of the <u>Steel Criteria</u>, steel production facilities or associated decarbonization measures as detailed within Table 6 of the <u>Steel Criteria</u>.</li> <li>Subject to meeting the eligibility requirements of the <u>Cement Criteria</u>, cement production facilities or decarbonisation measures including whole cement facilities, but also kilns, burners, grinding equipment, blending equipment, calciners, precalciners, Supplementary Cementitious Materials (SCM), digitisation measures, heat recovery systems, and others. Cement production facilities may be integrated from quarries to blended cement, or they may be responsible for only one stage of production, for example, clinker production, grinding, or blending.</li> </ul> | <div>11 SUSTAINABLE CITIES AND COMMUNITIES</div>  <div>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</div>   |
| Environmentally sustainable management of living natural resources and land use | <b><u>Agriculture Production</u></b><br><b><u>Forestry, Land Conservation &amp; Restoration</u></b> | <ul style="list-style-type: none"> <li>Capital and operating expenditure relating to environmentally sustainable agriculture including perennial and non-perennial crop production and animal husbandry, climate smart farm inputs such as biological crop protection or drip irrigation and environmentally sustainable fishery and aquaculture.</li> <li>Activities with the goal of reducing GHG emissions and enhancing carbon sequestration or enhancing adaptation and resilience.</li> <li>Environmentally sustainable forestry including Forest Stewardship Council (FSC) certified plantation forestry, sustainable forest management, afforestation or reforestation, preservation or restoration of natural landscapes and carbon sequestration.</li> </ul>  | <div>2 ZERO HUNGER</div>  <div>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</div>  <div>15 LIFE ON LAND</div>  |

| GBP Eligible Green Project Categories       | CBS Sector Criteria                         | Eligible Green Project Examples   | UN SDG Alignment  |
|---|---|---|---|
| Clean transportation                        | <b><u>Low Carbon Transport Shipping</u></b> | <ul style="list-style-type: none"> <li>• Energy efficient public transport including conversion of fossil fueled fleets to fully electric or hybrid.</li> <li>• Fully electric, hydrogen, or other zero-tail pipe emissions transport - including motorbikes, cars, light and heavy commercial vehicles, passenger or freight trains including urban subway/metro, trams and buses.</li> <li>• Public walking and cycling infrastructure.</li> <li>• Maritime freight and passenger transport vessels using low GHG (e.g. hydrogen, green methanol, ammonia, batteries or high % biofuel) or hybrid fuel sources that deliver substantial reductions in GHG emissions intensity and improvements in energy efficiency.</li> <li>• Enabling and supporting infrastructure supporting the above including electric charging infrastructure, low carbon liquid fuel or refueling infrastructure, electrified rail infrastructure and bus rapid transit systems.</li> </ul> | <div> <b>9</b> INDUSTRY, INNOVATION AND INFRASTRUCTURE<br/>  </div> <div> <b>11</b> SUSTAINABLE CITIES AND COMMUNITIES<br/>  </div>   |
| Green buildings                             | <b><u>Buildings</u></b>                     | <ul style="list-style-type: none"> <li>• Commercial buildings with a minimum National Australian Built Environment Rating System (NABERS) Energy 5 star, 5 star Green Star rating or equivalent best practice certification for environmental performance, or that fall within the top 15% by carbon emissions performance in that city.</li> <li>• Residential buildings that represent the top 15% by carbon emissions performance in that city, or that meet the minimum capacity solar photovoltaic (PV) installation required by the <u>Climate Bonds Standard Australian residential rooftop solar proxies</u> defined by postcode.</li> <li>• Property upgrades that result in at least 30% improvement in energy efficiency.</li> </ul>   | <div> <b>7</b> AFFORDABLE AND CLEAN ENERGY<br/>  </div> <div> <b>11</b> SUSTAINABLE CITIES AND COMMUNITIES<br/>  </div>   |
| Sustainable water and wastewater management | <b><u>Water infrastructure</u></b>          | <ul style="list-style-type: none"> <li>• Sustainable and resilient infrastructure for clean and/ or drinking water, including desalination plants, water distribution and storage.</li> <li>• Wastewater treatment and recycling.</li> <li>• Sustainable and resilient urban drainage systems and other forms of flooding mitigation.</li> <li>• Desalination plants with an average power intensity of energy to power of less than 100g CO2/kWh.</li> <li>• Flood defense systems.</li> <li>• Nature based solutions.</li> </ul>  | <div> <b>6</b> CLEAN WATER AND SANITATION<br/>  </div> <div> <b>11</b> SUSTAINABLE CITIES AND COMMUNITIES<br/>  </div> <div> <b>12</b> RESPONSIBLE CONSUMPTION AND PRODUCTION<br/>  </div> |

# Process for Evaluation and Selection of Eligible Projects and Assets

A high-level overview of NAB's processes for the selection of eligible projects and assets is set out below.

## Project Identification and Tagging

Where relevant, eligible green projects, assets or expenditures must comply with NAB's existing criteria for lending in the ordinary course of its business, including its customer-related ESG policies and appetite settings which are reviewed annually.

These policies and settings have been developed for a number of sectors over time, including for emissions-intensive, climate sensitive and low-emissions sectors, and provide qualitative risk appetite descriptions and quantitative tolerances or limits with respect to what the Group will and will not finance in order to assist in managing climate risk.

They are formalised in line with the Risk Management Strategy and Operational Risk Management Policy, NAB's High ESG Risk Sectors and Sensitive Areas list and Divisional credit strategies.

Further information about NAB's approach to the identification, management and management of Environmental, Social and Governance risk in NAB's general lending can be found in [NAB's Climate Report](#) and [Annual Reporting Suite](#).

NAB has also been a signatory to the Equator Principles since 2007 and considers its requirements when providing lending for specific projects.

In addition, all eligible green projects, assets or expenditures must meet one or both of the following:

- the eligibility requirements of the Climate Bonds Standard Sector Criteria; and
- alignment to the eligible project categories of the ICMA Green Bond Principles.

Eligibility criteria may be supplemented by the use of Australian Taxonomy criteria or other relevant guidelines where available and relevant

NAB has implemented processes for the identification, approval, tagging, tracking and reporting of lending for eligible green projects, assets and expenditures within its core systems.

This requires the relevant originating business unit to assess the proposed green project for compliance with internally developed guidance for tagging of green loans. This may require bankers to seek clarification on eligibility from NAB's Sustainable Finance team, independent assurance provider(s) and/or the Climate Bonds Initiative certification team. Additionally, NAB's Risk team conducts periodic review of asset eligibility.



## Green Bond Governance

NAB has established governance processes that support this Framework and NAB's annual Green Bond reporting, which includes monitoring and oversight by a governance body that comprises suitably skilled representatives from NAB Treasury, Risk, Finance, Legal and Corporate and Institutional Banking (Sustainable Finance) and other specialist support where required.

Additional guidance may be provided by NAB's independent assurance provider(s) and the Climate Bonds Initiative as required.

|   |   |
|---|---|
| <b>Project Identification</b>               | <ul style="list-style-type: none"> <li>Potential projects, assets and expenditures identified by NAB business units for tagging as eligible green projects.</li> </ul>  |
| <b>Review for Eligibility</b>               | <ul style="list-style-type: none"> <li>Projects, assets and expenditures reviewed by business units for compliance with 'use of proceeds' eligibility requirements of this Framework including alignment with the Green Bond Principles and where applicable with Climate Bonds Standard Sector Criteria.</li> <li>Guidance on eligibility sought from NAB's Sustainable Finance team, independent assurance provider(s) and certification team of the Climate Bonds Initiative if required.</li> </ul> |
| <b>Oversight</b>                            | <ul style="list-style-type: none"> <li>Governance forum within NAB reviews new categories of projects, assets and expenditures for inclusion in the Green Bond portfolio. Risk conducts periodic second line review of asset eligibility and reporting processes and disclosures.</li> </ul>  |
| <b>Tracking &amp; Reporting Established</b> | <ul style="list-style-type: none"> <li>Tracking and internal reporting of eligible projects, assets and expenditures implemented by NAB teams.</li> </ul>   |
| <b>Bond Issue</b>                           | <ul style="list-style-type: none"> <li>Where applicable, Climate Bonds Standard certification sought prior to issuance under Programmatic Climate Bonds Certification.</li> <li>Issue of NAB Green Bonds.</li> </ul>  |
| <b>Annual Reporting &amp; Assurance</b>     | <ul style="list-style-type: none"> <li>Third party assurance completed on an annual basis for all NAB Green Bonds and review of ongoing alignment with Framework for all NAB Green Bonds.</li> <li>Assurance report and NAB annual Green Bond Report published on <a href="#">NAB Capital and Funding website</a>.</li> </ul>   |

# Management of Proceeds

NAB has processes in place to monitor and report on the NAB Green Bond portfolio. Each NAB Green Bond has a unique identifier which is used in NAB's internal systems. NAB conducts a monthly verification to confirm that an amount equal to the net proceeds of all outstanding NAB Green Bonds has been fully allocated against eligible projects, assets and expenditures.

## 'Use of Proceeds' NAB Green Bonds

Under the Climate Bonds Standard, 'use of proceeds' Bonds are described as debt obligations with recourse to the issuer, with proceeds earmarked for nominated green projects and assets. NAB monitors the allocation of proceeds from 'use of proceeds' NAB Green Bonds on an aggregated basis, including those 'use of proceeds' NAB Green Bonds already issued.

NAB will only allocate proceeds from Climate Bonds Standard certified NAB Green Bonds against projects which meet Climate Bonds Standard Sector Criteria eligibility.

NAB monitors the portfolio by maintaining an internal register of lending to NAB Green Bond eligible projects, assets and expenditures and tracks the funds drawn against eligible facilities. The register is updated as facilities are drawn and originated and reported internally monthly.

The NAB Green Bond portfolio may be replenished as underlying loans are repaid and additional eligible projects, assets and expenditures are identified.

Eligible projects, assets and expenditures will be removed or substituted from the NAB Green Bond portfolio if they are found to no longer meet the eligibility requirements of this Framework.

NAB intends that an amount equivalent to the net proceeds of all 'use of proceeds' NAB Green Bonds have been allocated to eligible projects or assets within 24 months of issue.

## Unallocated Proceeds

Where full allocation of the net proceeds of a 'use of proceeds' NAB Green Bond is not achieved within 24 months of issuance (or where there is a subsequent shortfall), the surplus funds will either be invested in:

- a. other Climate Bonds Standard eligible projects, assets and expenditures not otherwise nominated for inclusion within the current NAB Green Bond portfolios; or
- b. temporary investments that:
  - are cash, or cash equivalent instruments within a Treasury function; or
  - do not include greenhouse gas intensive projects which are inconsistent with the delivery of a low carbon and climate resilient economy.

## Secured funding Instruments

NAB will separately monitor and report on the allocation of proceeds from the issue of secured NAB Green Bonds or other funding instruments such as Green residential mortgage backed securities (Green RMBS) where proceeds are allocated against unique closed pools of eligible projects or assets.

## Reporting

NAB will publish an annual NAB Green Bond Report, which will contain details of allocation of proceeds, environmental impact and eligibility in respect of the outstanding NAB Green Bonds. NAB Green Bond Reports may include:

- Net proceeds raised from each NAB Green Bond.
- NAB Green Bond proceeds allocated against each NAB Green Bond eligible category identified within the Framework.
- Information regarding eligible projects, assets and expenditures (either in aggregate or individually) included within the NAB Green Bond portfolio.
- Where possible, estimated qualitative and/or quantitative environmental impact reporting measures for eligible projects, assets and expenditures within the NAB Green Bond portfolio, including disclosure of assumptions and methodologies used in impact reporting. Appendix 1 sets out potential impact reporting indicators, that may be provided.
- Any unallocated NAB Green Bond proceeds and details of any temporary investments.
- Confirmation that the use of proceeds from NAB Green Bonds complies with the Framework and, where applicable, all Climate Bonds Standard certified NAB Green Bonds meet the requirements for certification under the Climate Bonds Standard.

Disclosure of information related to projects, assets and expenditures financed or re-financed by NAB Green Bond proceeds will be made subject to NAB's confidentiality obligations and the availability of information.

In preparing the annual NAB Green Bond Report, NAB will refer to the guidelines for impact reporting set out in the ICMA Green Bond Principles, as amended from time to time, and the current versions of reference frameworks such as [Harmonised Framework for Impact Reporting](#), PCAF, The GHG Protocol, and other green bond impact and relevant environmental impact (GHG) reporting guidelines and standards as they develop over time.

## External Review and Assurance

NAB has obtained a second party opinion or assurance from an appropriately credentialed external party to confirm that this updated Framework aligns with the ICMA Green Bond Principles and with the Climate Bonds Standard specific requirements for green bond frameworks.

On an annual basis, NAB will also retain a CBI approved verifier to provide assurance on whether each outstanding NAB Green Bond has complied with the obligations detailed in this Framework, and to maintain programmatic certification, provide assurance on whether the NAB Green Bonds remain in compliance with the post-issuance requirements of the Climate Bonds Standard.

The approved verifier will issue an annual Assurance Statement which will be published with NAB's annual Green Bond Report.

NAB's annual Green Bond Report and assurance statement will be made publicly available on the [NAB Capital & Funding website](#).



# Appendix 1

## Impact Reporting

NAB will look to implement current market practice for green bond impact reporting, including the ICMA Green Bond Principles guidelines set out in the ‘Harmonised Framework for Impact Reporting’, subject to the availability of information and confidentiality requirements. Examples of potential impact reporting indicators are summarised below.

| GBP Eligible Categories   | Potential Impact Reporting Indicators  |
|---|--|
| Renewable energy  | <ul style="list-style-type: none"> <li>Renewable generation capacity (MW)</li> <li>Annual renewable energy generation (MWh)</li> <li>Annual GHG emissions avoided (tonnes CO2 equivalent)</li> <li>Location/type of renewable generation</li> <li>Capacity of renewable energy plants to be served by transmission systems (MW)</li> </ul>   |
| Clean transportation  | <ul style="list-style-type: none"> <li>Kilometres of new electrified train lines or walking or cycling paths created</li> <li>Number of passengers transported</li> <li>Avoided GHG emissions (tonnes CO2 equivalent)</li> <li>Estimated reduction in car usage</li> </ul>   |
| Green buildings   | <ul style="list-style-type: none"> <li>Location and summary data relating to eligible buildings financed that meet Climate Bonds certification requirements</li> <li>Portfolio average of National Australian Built Environment Rating System (‘NABERS’) Energy ratings</li> <li>Portfolio average of Green Building Council of Australia (‘GBCA’) Green Star ratings</li> <li>Annual portfolio GHG emissions avoided (tonnes CO2 equivalent)</li> </ul>   |
| Energy efficiency   | <ul style="list-style-type: none"> <li>Energy saved per year (MWh/year)</li> <li>Energy efficiency improvement (%)</li> <li>Annual GHG emissions avoided (tonnes CO2 equivalent)</li> </ul> <p><i>To communicate on the social co-benefits of these projects (where available), other potential supplementary impact reporting indicators include:</i></p> <ul style="list-style-type: none"> <li>Number of people who benefitted</li> </ul>   |
| Pollution Prevention & Control  | <ul style="list-style-type: none"> <li>Annual GHG emissions avoided (tonnes CO2 equivalent) where available</li> <li>Annual absolute amount of waste that is prevented, minimized or recycled (tonnes or %)</li> <li>Annual energy generation from non-recyclable waste in energy efficient waste to energy (MWh)</li> <li>Annual absolute amount of waste that is separated and/or collected, and treated (including composted) or disposed of (tonnes or % of total waste)</li> </ul>  |
| Environmentally sustainable management of living natural resources and land use | <ul style="list-style-type: none"> <li>Annual GHG emissions avoided (tonnes CO2 equivalent) where available</li> <li>Estimated CO2 equivalent emissions sequestered through sustainable agriculture</li> <li>Total area of Forest Stewardship Council (‘FSC’) accredited sustainable forestry financed</li> <li>Increase of area under certified land management (km2)</li> <li>Number of seedlings planted</li> </ul>   |
| Sustainable water and wastewater management                                     | <ul style="list-style-type: none"> <li>Annual reduction in water use (%)</li> <li>Annual absolute (gross) amount of wastewater treated, re-used or avoided (m3 or %)</li> </ul> <p><i>To communicate on the social co-benefits of these projects (where available), other potential supplementary impact reporting indicators include:</i></p> <ul style="list-style-type: none"> <li>Number of people with access to clean drinking water through infrastructure supporting sustainable and efficient water use (or annual volume of clean drinking water in m3)</li> <li>Number of people with access to improved sanitation facilities under the project</li> <li>Number of people and/or enterprises benefitting from measures to mitigate the consequences of floods or droughts</li> </ul> |

## Contact us

NAB seeks to implement evolving market practice in relation to our NAB Green Bond issuance and reporting.

NAB welcomes feedback from our investors, other stakeholders and market participants.

Please email your queries and comments to: **NAB Debt Investor Relations at [debtinvestorrelations@nab.com.au](mailto:debtinvestorrelations@nab.com.au)**

# Disclaimer

This document includes general background information about the activities of NAB and is current as at the date of this document, 1 December 2025 (unless otherwise stated herein). It is information in a summary form and does not purport to be complete.

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This document contains certain “forward-looking statements”. The words “anticipate”, “ambition”, “believe”, “expect”, “project”, “forecast”, “estimate”, “outlook”, “upside”, “likely”, “intend”, “will”, “should”, “could”, “may”, “target”, “goal”, “plan” and other similar expressions are intended to identify forward-looking statements. The forward looking statements in this Framework reflect NAB’s best estimates, assumptions and judgements (including in relation to customer and other third party data over which NAB has no control) as at the date of this Framework and NAB has no obligation to update or revise any such statements to reflect any change in events, conditions or circumstances on which any such statement is based. There can be no assurance that actual outcomes will not differ materially from these statements. Readers are cautioned not to place undue reliance on these statements.

## Complexities and limitations inherent in climate-related methodologies

Climate-related metrics are underpinned by methodologies containing uncertainties, assumptions and judgements that limit the extent to which they can be relied upon. This applies to all climate-related metrics, including (without limitation) historical metrics relating to emissions and forward-looking climate metrics, such as goals, targets, climate scenarios or projections and pathways. A summary of the Group’s understanding of the main challenges associated with climate-related data, methodology and metrics relevant to NAB’s Green Bond Framework follows:

- Data availability, quality and timeliness vary considerably within and across businesses, industries and geographies. Climate related metrics are, in many cases, based on estimates, and rely on data that the Group does not generate or control, including property valuations used for Commercial Real Estate calculations, building codes used as a proxy for carbon performance of RMBS assets, emissions factors, and operational generation data for renewable energy generation assets. This may result in under or overestimates of climate-related risks or performance.
- Reliance on third party data can lead to lags in time between available data and the publishing of the Group’s annual Green Bond reporting.
- While the Group’s Green Bond Framework and reporting is based on ICMA Harmonised Framework for Impact Reporting and other guidelines including the CBI, and the GBP, these and other climate-related frameworks and standards are often voluntary. A range of frameworks and methodologies are used by corporate organisations reporting on climate related information and metrics which may make comparison by investors and others evaluating the climate performance of corporate organisations difficult.
- Estimating emissions and emissions reductions for the purpose of impact reporting is complex and requires significant methodological choices, judgements and assumptions. Methodologies vary across jurisdictions and global standards are still emerging. This means methodologies used to estimate emissions and emissions reductions are likely to change over time, impacting existing estimates, and reduction estimates based on existing estimates.
- Climate science is continually evolving. Scenarios and projections adopted by projects funded by NAB’s Green Bonds may have varying reliance on the commercialisation of currently unproven technologies to meet emissions reduction targets. Investment in these technologies may fail to achieve the intended outcomes. Overreliance on unproven technologies to meet project targets may impact the accuracy of estimates of emissions avoidable attributable to particular projects.
- Climate scenarios are modelled over a significantly longer time-frame than more traditional financial scenario modelling and therefore the complexity and risk of error is higher.