

# Our SASB Disclosure

SASB Disclosure	Accounting Metric	2020 Disclosure
<b>Financial Sector – Commercial Bank</b>		
CB-230a.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	Please refer to the <i>Cybersecurity and Information Security – Protecting Personal Information</i> section on page 70 of the 2020 ESG Report. Please also consult the <i>Top and Emerging Risks</i> section on page 73 of the <a href="#">2020 Annual Report</a> . National Bank does not disclose this information.
CB-230a.2	Description of approach to identifying and addressing data security risk	The Bank discloses how it manages information security risks on page 70 of the 2020 ESG Report. Please also consult the <i>Top and Emerging Risks</i> section on page 73 of the <a href="#">2020 Annual Report</a> .
CB-240a.1	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	National Bank is a key lender for small businesses: 80% of its Canadian business clients received loans under \$250,000 in 2020. The Bank also supports community development by financing close to 900 clients that offer social programs in housing and early childhood development—an amount close to \$1 billion.
CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	As at October 31, 2020, National Bank has 146,697 no-fee personal chequing accounts.
CB-240a.4	Number of participants in financial literacy initiatives for unbanked, underbanked or underserved customers	National Bank participates in a number of financial literacy initiatives as part of its activities, from discussing financial health and best practices with clients in branches to holding events to promote financial literacy. Although we don't track the number of participants who are unbanked, underbanked or underserved, we discuss the impact of our initiatives on page 44 of the 2020 ESG Report.
CB-410a.1	Commercial and industrial credit exposure, by industry	National Bank discloses its exposure to credit risk by industry on page 19 of the Supplementary Financial Information document for Q4 2020, which is available on <a href="#">nbc.ca</a> .
CB-410a.2	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	To comply with our commitments to the TCFD, we're improving our processes. We will be integrating ESG factors into our credit analyses in accordance with our roadmap. For more information, please consult the <i>Risk Management</i> section of the 2020 ESG Report on page 65.
CB-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations	National Bank does not disclose this information. In the normal course of business, the Bank and its subsidiaries are involved in various claims relating, among other matters, to loan portfolios, investment portfolios and supplier agreements, including court proceedings, investigations or claims of a regulatory nature, class actions or other legal remedies of varied natures. However, National Bank does not believe that any proceedings it is involved in could have a material negative impact on its consolidated financial situation. Please refer to note 26 (Guarantees, Commitments and Contingent Liabilities) on page 209 of the <a href="#">2020 Annual Report</a> .

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CB-510a.2	Description of whistleblower policies and procedures	Please refer to the <i>Governance – Code of Conduct and Ethics</i> section on page 61 of the 2020 ESG Report.
CB-550a.1	Global Systemically Important Bank (G-SIB) score, by category	Although National Bank is a domestic systemically important bank (D-SIB), it is not a G-SIB. We therefore have no G-SIB scores.
CB-550a.2	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	The crisis simulation program supports management's decision-making process by identifying potential vulnerabilities for the Bank as a whole, which are reflected in the limits established and in longer-term business planning. Scenarios and results are ultimately approved by the Board. The Bank also performs stress tests and liquidity risk crisis simulations. For more information, refer to pages 69 and 95 of the <a href="#">2020 Annual Report</a> .
CB-000.A	(1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business	National Bank had an average deposit volume of \$35,555 million for its Personal sector and \$36,697 million for its Commercial sector in Q4 2020. For more information, see the presentation given to analysts and investors in Q4 2020 on <a href="#">nbc.ca</a> . As at October 31, 2020, there were over 1.9 million chequing and savings accounts for the personal segment and over 184,000 for the commercial segment.
CB-000.B	(1) Number and (2) value of loans by segment: (a) personal, (b) small business, and (c) corporate	In Q4 2020, National Bank had an average volume of \$81,000 million in personal loans and bankers' acceptances and \$37,994 million in business loans and bankers' acceptances. For more information, see the presentation given to analysts and investors in Q4 2020 on <a href="#">nbc.ca</a> . The Bank disclosed the amount approved to businesses across Canada as debt financing and the number of businesses to which debt financing was granted. Please refer to page 8 of the <a href="#">2020 Corporate Social Responsibility Statement</a> . The Bank also disclosed its average loans and acceptances for corporate banking on page 9 of the Supplementary Financial Information document for Q4 2020, which is available on <a href="#">nbc.ca</a> .

### Financial Sector – Consumer Finance

CF-220a.2	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	National Bank does not disclose this information. In the normal course of business, the Bank and its subsidiaries are involved in various claims relating, among other matters, to loan portfolios, investment portfolios and supplier agreements, including court proceedings, investigations or claims of a regulatory nature, class actions or other legal remedies of varied natures. However, National Bank does not believe that any proceedings it is involved in could have a material negative impact on its consolidated financial situation. Please refer to note 26 (Guarantees, Commitments and Contingent Liabilities) on page 209 of the <a href="#">2020 Annual Report</a> .
CF-230a.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	Please refer to the <i>Cybersecurity and Information Security – Protecting Personal Information</i> section on page 70 of the 2020 ESG Report. Please also consult the <i>Top and Emerging Risks</i> section on page 73 of the <a href="#">2020 Annual Report</a> . National Bank does not disclose this information.

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CF-230a.3	Description of approach to identifying and addressing data security risks	Refer to the answer for standard <a href="#">CB 230a.2</a>
CF-270a.2	Approval rate for (1) credit and (2) pre-paid products for applicants with FICO scores above and below 660	Although National Bank does not disclose this data, the average value, Loan-to-Value (LTV) ratio and FICO score for its portfolio of Canadian mortgage loans and home equity lines of credit can be found in the presentation given to analysts and investors in Q4 2020, available on <a href="#">nbc.ca</a> . Additional information on the credit quality of our loan portfolio can be found on pages 80 and 169 of the <a href="#">2020 Annual Report</a> .
CF-270a.5	Total amount of monetary losses as a result of legal proceedings associated with selling and servicing of products	National Bank does not disclose this information. In the normal course of business, the Bank and its subsidiaries are involved in various claims relating, among other matters, to loan portfolios, investment portfolios and supplier agreements, including court proceedings, investigations or claims of a regulatory nature, class actions or other legal remedies of varied natures. However, National Bank does not believe that any proceedings it is involved in could have a material negative impact on its consolidated financial situation. Please refer to note 26 (Guarantees, Commitments and Contingent Liabilities) on page 209 of the <a href="#">2020 Annual Report</a> .
CF-000.B	Number of (1) credit card accounts and (2) pre-paid debit card accounts	As at October 31, 2020, we had over 800,000 active credit card accounts for the Personal and SME segment.

### Financial Sector – Mortgage Finance

MF-270a.3	Total amount of monetary losses as a result of legal proceedings associated with communications to customers or remuneration of loan originators	National Bank does not disclose this information. In the normal course of business, the Bank and its subsidiaries are involved in various claims relating, among other matters, to loan portfolios, investment portfolios and supplier agreements, including court proceedings, investigations or claims of a regulatory nature, class actions or other legal remedies of varied natures. However, National Bank does not believe that any proceedings it is involved in could have a material negative impact on its consolidated financial situation. Please refer to note 26 (Guarantees, Commitments and Contingent Liabilities) on page 209 of the <a href="#">2020 Annual Report</a> .
MF-270b.1	(1) Number, (2) value, and (3) weighted average Loan-to-Value (LTV) ratio of mortgages issued to (a) minority and (b) all other borrowers, by FICO scores above and below 660	Although National Bank does not disclose this data, the average value, LTV ratio and FICO score for its portfolio of Canadian mortgage loans and home equity lines of credit can be found in the presentation given to analysts and investors in Q4 2020, available on <a href="#">nbc.ca</a> . Also see page 21 of the Supplementary Financial Information document from Q4 2020 for more information on our portfolio of residential mortgage loans on <a href="#">nbc.ca</a> .
MF-270b.3	Description of policies and procedures for ensuring non-discriminatory mortgage origination	National Bank complies with all anti-discrimination laws and regulations. In addition, the Bank's <a href="#">Code of Conduct and Ethics</a> applies to everyone at the Bank (employees, directors and officers). The Code of Conduct and Ethics establishes a zero-tolerance policy for any type of discrimination.

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MF-000.A	(1) Number and (2) value of mortgages originated by category: (a) residential and (b) commercial	National Bank discloses the value of its residential mortgages and the value of loans by category in the presentation given to analysts and investors in Q4 2020, available on <a href="http://nbc.ca">nbc.ca</a> .
MF-000.B	(1) Number and (2) value of mortgages purchased by category: (a) residential and (b) commercial	In the fiscal year 2020, the Bank purchased mortgage loans from iA Financial Group. The loan portfolio included about 6,600 residential mortgage loans for a total value of \$1.1 billion.

### Financial Sector – Investment Banking and Brokerage

IB-330a.1	Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other employees	Please refer to the <i>Taking Action for a More Inclusive Future Today</i> section of the 2020 ESG Report on page 49 and the <a href="#">2020 Inclusion and Diversity Booklet</a> .
IB-410a.2	(1) Number and (2) total value of investments and loans incorporating integration of ESG factors, by industry	Please refer to the <i>Responsible Investment – Sustainability Bonds</i> section of the 2020 ESG Report on page 38 as well as to the <i>Capital &amp; Debt Information</i> section on <a href="http://nbc.ca">nbc.ca</a> .
IB-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations	Refer to the answer for standard <a href="#">CB 510a.1</a>
IB-510a.2	Description of whistleblower policies and procedures	Refer to the answer for standard <a href="#">CB 510a.2</a>
IB-510b.3	Total amount of monetary losses as a result of legal proceedings associated with professional integrity, including duty of care	National Bank does not disclose this information. In the normal course of business, the Bank and its subsidiaries are involved in various claims relating, among other matters, to loan portfolios, investment portfolios and supplier agreements, including court proceedings, investigations or claims of a regulatory nature, class actions or other legal remedies of varied natures. However, National Bank does not believe that any proceedings it is involved in could have a material negative impact on its consolidated financial situation. Please refer to note 26 (Guarantees, Commitments and Contingent Liabilities) on page 209 of the <a href="#">2020 Annual Report</a> .
IB-510b.4	Description of approach to ensuring professional integrity, including duty of care	Every year, all employees, directors and officers of the Bank sign the <a href="#">Code of Conduct and Ethics</a> , which requires them to demonstrate honesty, trust, integrity and loyalty in all of their actions.
IB-550a.1	Global Systemically Important Bank (G-SIB) score, by category	Refer to the answer for standard <a href="#">CB 550a.1</a>
IB-550a.2	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	Refer to the answer for standard <a href="#">CB 550a.2</a>
IB-000.A	(1) Number and (2) value of (a) underwriting, (b) advisory, and (c) securitization transactions	National Bank acted as agent for 172 transactions with a total value of over \$102 billion and as underwriter for 313 transactions with a total value of \$267 billion.

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<b>Financial Sector – Asset Management and Custody Activities</b>		
AC-270a.2	Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product related information to new and returning customers	<p>National Bank does not disclose this information.</p> <p>In the normal course of business, the Bank and its subsidiaries are involved in various claims relating, among other matters, to loan portfolios, investment portfolios and supplier agreements, including court proceedings, investigations or claims of a regulatory nature, class actions or other legal remedies of varied natures. However, National Bank does not believe that any proceedings it is involved in could have a material negative impact on its consolidated financial situation.</p> <p>Please refer to note 26 (Guarantees, Commitments and Contingent Liabilities) on page 209 of the <a href="#">2020 Annual Report</a>.</p>
AC-270a.3	Description of approach to informing customers about products and services	<p>Employees of National Bank are bound by the <a href="#">Code of Conduct and Ethics</a>, which sets out a number of basic principles to protect clients, including, "We must inform them in a transparent manner about the rates, fees and conditions of every transaction for every product they acquire." Please refer to the <i>Protecting Our Clients' Interests</i> section on page 27 of the 2020 ESG Report.</p> <p>National Bank also complies with the regulations set out by the Financial Consumer Agency of Canada, provincial consumer protection agencies, IIROC, the Mutual Fund Dealers Association of Canada, the TSX and provincial regulatory authorities, including securities regulatory authorities. The Human Resources Committee reviewed the Bank's compensation practices in 2017 and continues to do so periodically.</p>
AC-330a.1	Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other employees	Refer to the answer for standard <a href="#">IB 330a.1</a>
AC-410a.1	Amount of assets under management, by asset class, that employ (1) integration of environmental, social, and governance (ESG) issues, (2) sustainability themed investing, and (3) screening	<p>Through its open architecture business model, National Bank Investments entrusts the management of its funds and investment solutions to external portfolio managers. 97% of National Bank Investments' assets under management as at October 31, 2020, were managed by signatories of the UN Principles for Responsible Investment. NBI assesses its external managers' integration of ESG criteria as part of its proprietary OP4+ analysis framework.</p> <p>Furthermore, 87% of NBI's assets under management are managed by Canadian fund managers who belong to the Responsible Investment Association.</p> <p>For more information, see the <i>NBI</i> section of the 2020 ESG Report on page 40.</p>
AC-410a.2	Description of approach to incorporation of environmental, social, and governance (ESG) factors in investment and/or wealth management processes and strategies	National Bank discloses how it integrates ESG criteria in its OP4+ process. For more information, see the <i>NBI</i> section on page 40 of the 2020 ESG Report and on <a href="#">nbinvestments.ca</a> .
AC-410a.3	Description of proxy voting and investee engagement policies and procedures	Our proxy voting and investee engagement policies and procedures are available on <a href="#">nbinvestments.ca</a> .

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AC-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations	Refer to the answer for standard <a href="#">CB 510a.1</a>
AC-510a.2	Description of whistleblower policies and procedures	Refer to the answer for standard <a href="#">CB 510a.2</a>
AC-550a.2	Description of approach to incorporation of liquidity risk management programs into portfolio strategy and redemption risk management	<p>The investment funds and services offered by National Bank Investments (NBI) are governed by a liquidity risk management policy (internal publication). This policy is intended to establish liquidity requirements for investment funds and services offered by NBI, as well as a framework for their application.</p> <p>To manage risk, NBI monitors the following three components:</p> <ul style="list-style-type: none"> <li>› Liquidity risk associated with product design (redemption conditions tailored to investment strategy)</li> <li>› Liquidity risk associated with the market for the products (liquidity dashboard, liquidity groups, third-party supplier data, various metrics, etc.)</li> <li>› Liquidity risk associated with holding the products (historic rates for redemption requests, asset concentration, etc.)</li> </ul> <p>The policy complements Regulation 81-102 respecting Investment Funds for the products governed by it and establishes the requirements for other products.</p> <p>As authorized by the Canadian Securities Administrators, NBI can suspend the right to redeem securities for products governed by the prospectus under certain conditions (see prospectus under <i>Right to Refuse the Redemption of Fund Securities</i>).</p>
AC-550a.3	Total exposure to securities financing transactions	National Bank disclosed its total exposure to securities financing transactions in the Supplementary Financial Information document from Q4 2020, which is available on <a href="#">nbc.ca</a> . Total exposure as at Q4 2020 was \$16,686 million.
AC-000.A	(1) Total registered and (2) total unregistered assets under management (AUM)	In Q4 2020, National Bank had \$596.6 billion in assets under management and administration. For a breakdown of this data, please refer to the Supplementary Financial Information document from Q4 2020, which is available on <a href="#">nbc.ca</a> .