

NatWest Group plc

2022 Human Rights Position Statement



NatWest
Group

Championing potential

A relationship bank for a digital world

Introduction

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NatWest Group is a relationship bank for a digital world.

We champion potential; breaking down barriers and building financial confidence so the people, families and businesses we serve in communities throughout the UK and Ireland can thrive.

With 19 million customers across the UK, we offer a comprehensive range of banking and financial services delivered through well-known banking brands such as NatWest, Royal Bank of Scotland, Ulster Bank and Coutts. The size and scale of our business activity connects us to millions of individuals and their families. As a result, we know that we have an important role to play in both respecting and promoting human rights. Respect for human rights runs through Our Values⁽¹⁾ and helps to achieve our purpose, ‘to champion potential and help individuals, families and businesses to thrive’.

This statement sets out NatWest Group’s responsibilities and the action that we take to respect human rights. It applies to our own operations and business relationships which include customers, suppliers and companies in which we invest on behalf of customers. Its aim is also to help stakeholders to understand our approach to respecting human rights and help them identify other documents and policy statements which outline the expectations of our colleagues, customers and suppliers in this area.

(1) Our Values of being Inclusive, Curious, Robust, Sustainable and Ambitious guide and inspire us through everything we do.

Working to meet international standards

At NatWest Group, we understand that businesses have an important role to play in promoting respect for human rights. We continue to implement policies and practices which cover our colleagues, customers and suppliers to promote and respect human rights. This approach reflects our desire to maximise any positive impacts and reduce, where possible, any potential negative impacts that our activity and the activity in our value chain may have on society.

We continue to align our approach to the United Nations Guiding Principles on Business and Human Rights which also covers other internationally recognised frameworks, including:

- OECD Guidelines for Multinational Enterprises;
- International Labour Organisation's Declaration of Fundamental Principles and Rights at Work;
- International Bill of Rights (incorporating the UN Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights).

In accordance with the Modern Slavery Act (MSA) we publish an annual Modern Slavery & Human Trafficking Statement which outlines the steps that we have taken to identify and mitigate modern slavery and human trafficking within our own operations, supply chain and customer base. Our statement also includes information on the steps that we have taken to support survivors of modern slavery and any forward-looking improvements we intend to make in the year ahead.

We engage with a range of external stakeholders on the responsibilities of businesses in respecting human rights and are a member of the Thun Group, which discusses how the financial services sector can incorporate and embed the UN Guiding Principles into their due diligence processes. NWG also participates in several annual indices and benchmarks which help to inform our activity and identify opportunities to improve our approach.

As signatories to the Principles for Responsible Banking (PRB), we support the UN Sustainable Development Goals (SDGs), in particular:



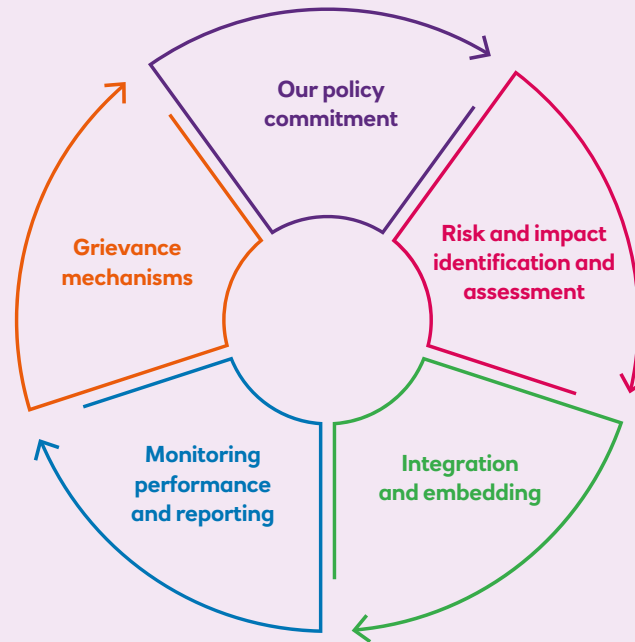
What we have in place⁽²⁾

* Grievance mechanisms

1. 'Speak Up' service in place allowing employees and those acting on behalf of the bank (contractors, subcontractors, suppliers, secondees, consultants, temporary colleagues, interns and volunteers) and anyone formerly in these roles to raise concerns in confidence (and anonymously if preferred)
2. Customer Complaints process allows customers to raise any issues of misconduct or wrongdoing

* Monitoring performance and reporting

1. Modern Slavery Statement and Human Rights Statement
2. ESG Supplement
3. EcoVadis assessments which help to monitor in-scope supplier performance on key areas of sustainability
4. Number of customer ESE assessments undertaken (reported annually)
5. 'Our View' survey used for progress measurements
6. Stakeholder feedback



* Our policy commitment

1. Human Rights Statement and Modern Slavery & Human Trafficking Statement approved and signed by Chief Executive and Chairman
2. Our Code, NatWest Group Code of Conduct
3. Supplier Charter
4. Environmental, Social & Ethical (ESE) risk framework
5. Coutts Responsible Investing policy
6. Speak Up

* Risk and impact identification and assessment

1. Equator Principles requirements (applicable project-related impacts)
2. High-risk ESE sectors and transactions where additional due diligence is undertaken
3. EcoVadis assessments for in-scope suppliers which help to identify environmental, social and ethical improvements
4. Pre employment screening (PES) undertaken during the recruitment process




* Integration and embedding

1. Established a Group-wide Human Rights Steering Group, responsible for embedding human rights due diligence across the business, reporting to the Executive Committee/Board
2. Stakeholder (internal and external) engagement
3. Responsibility for human rights assigned to teams within some business functions i.e. diversity, equity and inclusion within People and Transformation
4. Provision of training and learning material including mandatory training on diversity, equity and inclusion and health and safety at work

(2) We are continually striving to evolve and improve our approach to respecting human rights. Going forward, we will look to make further improvements to our policies, processes and services to further align them with international standards including the UNGPs.

Governance and our policy framework

Our NatWest Group policy framework includes, but is not limited to, the following policies, assessments and guidance

 Our customers	 Our colleagues	 Our suppliers
Environmental, social and ethical (ESE) risk management framework	Our Code, The NatWest Code of Conduct	Supplier Charter
Complaints management policy	Yes Check	EcoVadis assessment (for in-scope suppliers)
Coutts responsible investing policy	Our Values	
	Our Critical People Capability (CPC's) Behaviours	
	Injury and Harm Risk Standard	
	Health, Safety and Environment Organisational Arrangements	
	Fair Pay Charter	

← **Privacy and Client Confidentiality policy** →

← **Speak Up policy** →

← **NWG Financial Crime Statement⁽³⁾** →

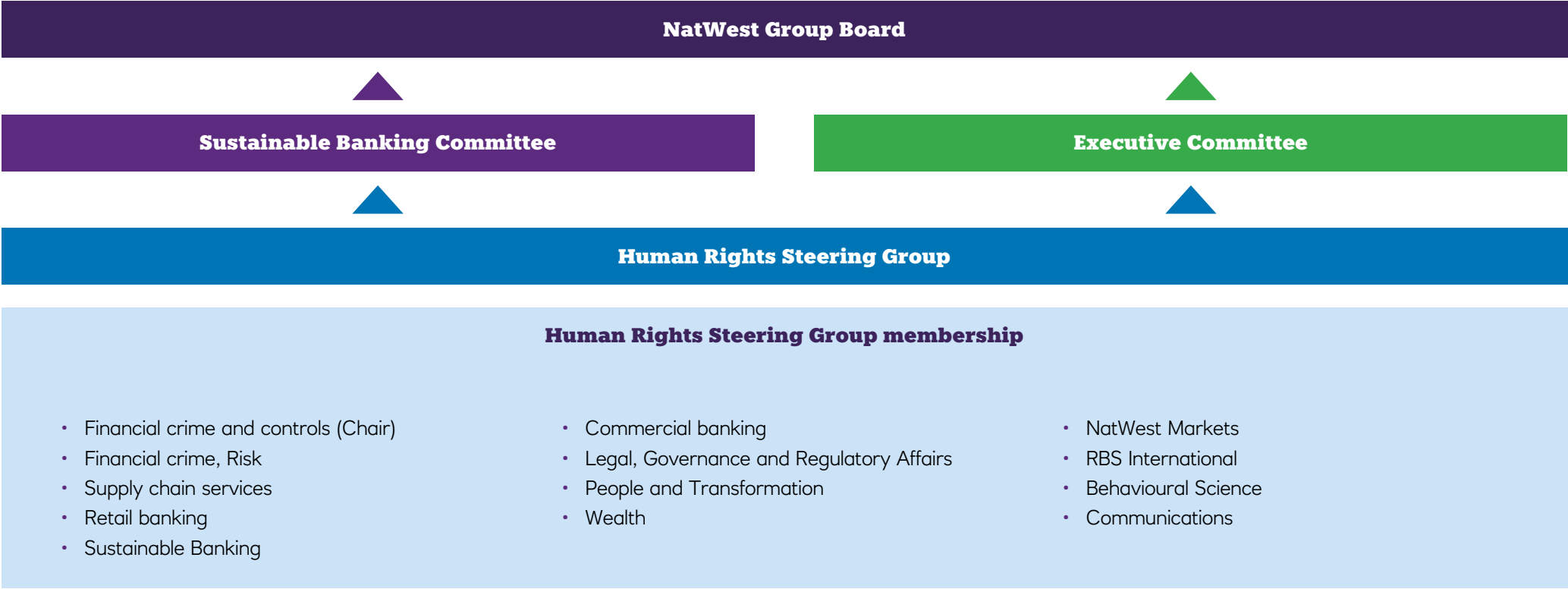
(3) For further information please see our [Financial Crime statement](#)

Governance continued

We recognise the importance of a collaborative approach respecting human rights across NatWest Group.

We have established a Human Rights Steering Group, a management group that brings representatives from across NatWest Group together to coordinate our activities, and to make recommendations to the NatWest Group Executive Committee and Board to develop and strengthen our approach.

Day-to-day responsibility for embedding human rights within our own operations lies with various functions and franchises. The Sustainable Banking Team is responsible for co-ordinating our human rights activity throughout the Group but the daily work of doing business with respect for human rights is the responsibility of hundreds of colleagues across the Group from relationship managers to risk advisors.



Human rights **impacts**

NatWest Group is building ever deeper and closer connections with our customers throughout their financial lives, enabling people, families and businesses to thrive. We recognise that in carrying out our activity (in our role as an employer, lender, procurer of goods and services, asset manager or in providing financial services to individuals), there is a risk that unintentionally, we may impact human rights.

Our approach to human rights, therefore, focusses on our relationships with our customers, colleagues and suppliers:



Our customers

Our relationship with our retail, commercial, and wealth customers is governed by a wide range of risk considerations including our financial crime policies and environmental, social and ethical (ESE) risk assessments, which are undertaken on both new and existing customers. These help us to consider whether our customer’s activity carries any human rights infringements.



Our colleagues

We employ a large number of colleagues and ensure that all our colleagues are recruited subject to local jurisdiction requirements⁽⁴⁾ (including local immigration requirements). We have a framework in place that includes Our Code, the Yes Check and Speak Up which supports and promotes the values behind our purpose and culture.



Our suppliers

We procure a range of goods and services ranging from computers to lighting and are not only connected to the workers within our direct supply chain but also thousands of workers within their operations and supply chain. Our Supplier Charter sets out our aims and expectations in the area of human rights. We expect suppliers to uphold the same values and encourage them to implement the standards with their own subcontractors.

⁽⁴⁾ For more information on how we recruit our colleagues please see our [2021 Modern Slavery and Human Trafficking Statement](#).

Undertaking business responsibly



Human rights and customers

Retail customers

Access to the financial system can be an important enabler which allows an individual to shape their future. We recognise that access to a basic bank account is a requirement for most people. For customers who are unable to open a standard account, we offer a Foundation account. This allows a customer who may have experienced financial difficulty in the past or find themselves in a vulnerable situation, to access the financial system and manage their money.

Development of the Inclusive Design Panel

At NatWest Group, we understand that it is more important than ever to ensure customers' needs are carefully considered within our design and development of products and services, and that we meet varying customer requirements and expectations of designing inclusively.

In March 2022, NatWest Group created the Inclusive Design Panel. The panel is a monthly forum that brings voices of people with 'lived experience' into the organisation. Their experiences are combined with feedback from key charities to support teams in developing products and propositions.

This feedback from charities and lived experts, supports us to design and adapt our products, propositions and services to be as inclusive as possible, and helps shape the future of our design with the customer at the forefront.

We know during a customer's lifetime, many could experience periods of vulnerability, where they may need additional support. The panel encourages open dialogue and expert opinions about our propositions, so we can effectively and confidently adapt our services to support customers during these periods of vulnerability.

We also work with charities, partner organisations and trade bodies to provide additional support to customers in vulnerable situations such as victims of domestic, economic and financial abuse, modern slavery, ex-offenders and customers in financial difficulty to find solutions and help them to remain engaged with the financial system.

We seek to ensure that customers are at the forefront of our approach when designing new services. We aim to deliver solutions that cater for everyone, with a focus on how we assist customers with additional needs.

We provide all our personal and premier customers with an accessible debit card. We have translation services available to support communications with customers where English is not their preferred language (available for 160 languages). The majority of our ATMs support visually impaired users through the provision of a 'Talking ATM' function; we also have a service that allows British Sign Language (BSL) users to communicate with us through a BSL interpreter. We continue to improve access in our branches with power-assisted doors, ramps and handrails, and hearing induction loop systems, while adding colour and textural contrasts on our flooring to help customers navigate our new branches. Banking My Way is a free service which allows customers to tell us how we can tailor our services to suit them. This allows customers to inform us about their needs or an adjustment they require and allows us to deliver a service that is right for them.

Commercial and institutional customers⁽⁵⁾

At NWG, we know and understand that what we choose to finance can bring benefits to society and have a positive impact on the lives of many individuals and families.

Social risks, including human rights risks, are an important consideration for NWG when deciding whether to engage with customers and potential customers and what projects to finance.

The activities of our customers can have environmental, social and ethical (ESE) impacts – including the potential for human rights infringements. To help us assess and manage these risks, we have an ESE risk framework comprising of policies and processes to give us better insight into our customers' activities and address issues of concern. The framework requires enhanced due diligence to be performed for certain customers' relationships, transactions, activities and projects. Our policies reflect applicable national and international laws and confirm that we expect our customers to adhere to local and international environmental, social and human rights standards. The policies also incorporate a number of voluntary standards such as the Equator Principles.

We have developed Risk Acceptance Criteria for nine sectors which present heightened ESE risk and define the level of ESE risk the bank is prepared to accept. They are reviewed and updated regularly to take account of changes in regulation and our own standards as we strive to be purpose led. These apply to all legal entities within NatWest Group.

We also have an ESE risk concerns process, which seeks to ensure that ESE risk is identified and managed for customers and transactions in sectors which are not covered by an RAC. Examples might include major or sustained human rights, modern slavery or social issue-related campaigns against a company in sectors such as agriculture/food, chemicals, tobacco, pharmaceuticals and waste management, or companies associated with controversial projects.

(5) Covers business banking, commercial mid-market, corporate banking and financial institutions.

Investing responsibly

Coutts Asset Management is the centre of expertise for NatWest Group and provides investment services to Coutts, NatWest and Royal Bank of Scotland customers. Responsible investing is a core pillar of their investment process and the incorporation of environmental, social and governance factors into all discretionarily managed funds and portfolios.

Collaboration

Coutts understands the strength in working with fellow investors to address ESG risks such as climate change and human rights and has joined several investor initiatives and networks such as the Net Zero Asset Managers Initiative, Climate Action 100+ and United Nations Principles for Responsible Investing.

Third-party funds

When investing in funds managed by third parties, Coutts undertakes due diligence and analyses the performance of each manager. This includes assessing their approach to responsible investing (including looking at key human rights indicators) and stewardship, and the degree to which they adhere to our approach and responsible ownership principles. Progress is monitored through regular reporting and ongoing dialogue with our asset managers, as well as formal annual reviews.

Stewardship activity

Coutts has worked in partnership with EOS at Federated Hermes since 2016. Through this partnership EOS engages with companies on their engagement priorities. These include human and labour rights and ensuring that a company's wider corporate culture, business ethics and enterprise risk management embed a respect for human and labour rights. All companies have a responsibility to respect human rights which can include decent work such as no forced labour, no child labour and payment of living wage; the safeguarding of indigenous communities and those living in high-risk environments (such as conflict zones); and the protection of basic human rights and digital rights, which are human rights specific to cyberspace. Coutts reports engagement activity on a quarterly basis available on Coutts.com.

Undertaking business responsibly continued

EOS provided voting instruction for 16,756 resolutions at 1,157 company meetings during 2021 on behalf of Coutts. As a shareholder, using voting power can be a straightforward way to signal dissatisfaction with company management or support. For 2022 EOS at Federated Hermes have outlined their expectations on companies towards human rights and labour rights in the following guidelines, and can vote against companies not meeting expectations.

How a company manages its human rights strategy is of critical importance to its licence to operate, its impact on people's lives and ultimately its ability to create and preserve long-term holistic value.

NatWest Group ESE sector risk acceptance criteria (RAC)

-  **Adult entertainment**
-  **Animal testing**
-  **Defence customer**
-  **Forestry, fisheries and agribusiness**
-  **Gambling**
-  **Mining and metals**
-  **Oil and gas**
-  **Power generation**
-  **Private security companies**

Starting in 2023, we will consider recommending votes against relevant proposals, including the election of directors, where a company is in clear breach of its applicable regulatory responsibilities or those outlined in the UN Guiding Principles on Business and Human Rights, and/or if there is sufficient evidence that a company has caused or contributed to egregious, adverse human rights impacts or controversies and has failed to provide appropriate remedy.⁽⁶⁾

Exclusions

Portfolio exclusions are a blunt tool used to remove companies from a portfolio. Coutts took the decision to exclude companies from their Blackrock managed ESG insight funds that are violators of the United Nations Global Compact Principles, a set of 10 principles focussed on: human rights, labour rights, the environment, and corruption.⁽⁷⁾

Data protection and privacy

Data protection ensures the right to privacy and gives individuals rights in relation to their information. At NatWest Group, we understand that our customers trust us not only with their finances but also with their information and that we need to meet their expectations in terms of how we obtain, hold and use that information. We have several policies in place that govern the processing of our customer personal information by all parts of the NatWest Group in all jurisdictions. Our externally available privacy notice provides a comprehensive overview about how we handle personal information, including what information we collect, what we do with that information and under what circumstances we would share that information with third parties.

Accountability is a key principle of data protection and privacy and ultimate accountability lies with the Board. The NatWest Group has appointed a Group Data Protection Officer who is responsible for overseeing data protection compliance across the bank and keeping the Board informed.



Human rights and our colleagues

Our purpose underpins the way that we do business, it drives us, defines us and guides our decision-making. Colleagues lie at the heart of everything we do and helping them to achieve their full potential and thrive within a respectful, inclusive and fair workplace is key to achieving our purpose.

As a large financial services organisation, we employ thousands of colleagues globally and as a result, understand that we have the potential to (positively or negatively) impact their human rights.

We have therefore established policies that outline our duties as a responsible employer and through which our respect for human rights is embedded. These policies either directly or indirectly promote human rights and outline our commitment to:

- our culture;
- a healthy and safe working environment;
- fair recruitment;
- fair and transparent reward;
- encouraging freedom of association and collective bargaining;
- creating a diverse, equitable and inclusive culture;
- encouraging a healthy work/life balance; and
- data protection and privacy.

Our culture

Our culture is governed by our Code of Conduct, Our Code, which lays out our purpose and the values and behaviours we expect from each other. It supports our colleagues to achieve the best outcomes for our customers by adhering to ethical standards. Our Code includes a "Yes Check" decision-making framework which helps our colleagues to use good judgement and act with integrity, openness and fairness.

A healthy and safe working environment

We seek to provide a healthy and safe environment and to minimise work-related injuries and incidence of ill health among our colleagues and visitors. The majority of our employees work in lower-risk environments (e.g. office-based activity) and are not exposed to significant occupational health and safety hazards. However, some locations such as our cash operations centres and branches have exposure to different types of hazards, such as the lifting and handling of objects. Nevertheless, we have a programme of initiatives in place to ensure that we continually improve our health and safety performance. We have developed a health and safety organisational arrangements document which is our policy equivalent and where relevant we report health and safety incidents to relevant authorities.

Fair recruitment

We select our people based on merit and actively recruit from the widest available pool of talent to give us the best possible choice for selection as we strive to create a diverse, equitable and inclusive workplace. To support the development of an inclusive mindset we run an annual inclusion e-learning module, which is compulsory for all NatWest Group colleagues. In January 2021, we refreshed our line manager interview training, 'Championing potential through our interviews,' which has a sharper focus on inclusion, bias and the candidate experience. We also extended our 'Recruitment Yes Check' to all colleagues to help maintain a bias-free recruitment process, which we are embedding through 'inclusion interview ambassadors'. Ambassadors are colleagues who are accredited in interview support and sit on interview panels, helping to bring diversity, challenge and an objective lens to the decision-making process.

⁽⁶⁾ For further information please visit [Hermes-investment.com](https://hermes-investment.com)

⁽⁷⁾ For further information please visit [Coutts.com](https://coutts.com)

Undertaking business responsibly continued

Fair and transparent reward

We're committed to paying our colleagues fairly, knowing this helps them feel valued, respected and recognised for the work they do. Our 'Fair Pay Charter' sets out our commitment to pay all our colleagues competitively and transparently, and our 'Reward Policy' is updated according to the current and future needs of the business. In the UK, our rates of pay continue to exceed the 'Living Wage Foundation' benchmarks. For our major hubs outside the UK, we continue to pay above the minimum and living wage rates in the Republic of Ireland and exceed the minimum wage benchmarks in India and Poland.

Encouraging freedom of association and collective bargaining

We recognise colleagues' fundamental rights to form and associate with trade unions and representative bodies.

Creating a diverse, equitable and inclusive workplace

This is integral to fulfilling our purpose. It enables us to work together to achieve great things with our colleagues, communities and customers. We will stand up for people who are excluded, remove barriers that stop people progressing in their career and create a safe, happy and healthy environment for all. We want to give everyone who works here, and every customer who comes into contact with us, the chance to succeed and the support to thrive.

We are committed to improving our gender balance. We were one of the first signatories to the HM Treasury Women in Finance Charter and have put in place a target to have full gender balance in our CEO -3 and above roles by 2030.

From 1 January 2023 NatWest is introducing a 'Partner Leave' policy which will allow parents – regardless of their gender or identity – to spend more time supporting their partners who have given birth, had a child born through surrogacy or had a child placed through adoption.

Encouraging a healthy work/life balance

We are committed to supporting families and carers, ensuring they are able to balance family and work responsibilities in a way that supports their mental and physical wellbeing. To help our colleagues develop a work/life balance, create an inclusive, flexible working culture and to help us focus on our customers' needs, we offer choice in working locations and patterns. There is a large amount of wellbeing support and resources offered by the bank in relation to both physical and mental wellbeing and colleagues are able to access a free, confidential employee wellbeing service (EAP) at any time during the day or night.

Data protection and privacy

Data protection ensures the right to privacy and gives individuals rights in relation to their information. We have several policies in place that govern the processing of our colleagues' personal information.



Human rights and suppliers

Suppliers

As a purpose-led business we foster strong relationships with all our key stakeholders, including our suppliers.

We engage with a wide range of suppliers, who help us to deliver high-quality products and services to our customers. Contractually, we require all suppliers to comply with applicable laws and regulations. We also expect all our suppliers to operate in an ethical, open and transparent manner and uphold the same values and commitments we have in relation to human rights. These requirements are set out in our Supplier Charter.

The NatWest Group Supplier Charter was launched in September 2020 and has been reviewed and updated every year. It outlines our own commitments in the area of human rights and details our expectations of suppliers to respect human rights, both in their own workforce and of those in their supply chain, which includes:

- complying with the Modern Slavery Act;
- prohibiting the use of forced and child labour;
- upholding the freedom of association and the right to collective bargaining;
- providing a healthy and safe working environment;
- respecting the rights of local communities within their business operations; and
- meeting the minimum and national wage requirements.

Adherence to these commitments is required as part of our supply chain tendering process and throughout the life of the supplier engagement.

Through our Supplier Charter, we've committed to understand and measure our performance and the performance of our suppliers across various areas of sustainability. To help us meet this commitment, we created a new relationship with EcoVadis to provide independent, third-party evidence-based assessments of our suppliers' performance in the area of labour and human rights.

In line with good practice, we conduct review meetings with suppliers. Compliance with our Supplier Charter is a standing agenda item at these meetings. If a supplier is unable to comply with the human rights commitments within the Supplier Charter, this is raised through NWG's operational risk process. This includes engagement with the supplier to offer support and identify possible remediation measures.

Raising a concern

At NatWest Group, we are committed to acting responsibly but where we fail to meet the high standards that we have set ourselves, we have put in place a range of channels through which colleagues, suppliers, customers and other externally impacted people can provide feedback or raise concerns (including concerns around human rights).



Customers

A customer can raise a concern or express their dissatisfaction with any element of the service they have received online, on the phone, in writing or in person at one of our branches. NatWest Group has a complaints management policy and detailed procedures for complaint handlers to follow in managing and addressing complaints. Where a customer's complaint alleges employee misconduct, wrongdoing or any potential infringement of human rights, it is referred to one of the specialist NatWest Group Investigations teams and assessed and investigated as appropriate.

If a customer or individual would like to raise a concern on how any part of the Group has handled their personal information, this can be raised via Customer Complaints or directly with our Data Protection Officer, who will ensure the matter is fully investigated.

Externally impacted people/groups

NatWest Group seeks to engage with a range of external stakeholders to gain their insight and feedback on our policies on a range of issues including human rights. This engagement is carried out by teams across the Group and helps us to better understand the impacts that our business may have on individuals or communities.

Through this process, Non-Governmental Organisations (NGOs), campaign groups or communities can raise any concerns directly with us. These concerns are fully investigated, and we aim to respond quickly and fairly to any feedback we receive.



Colleagues

Speaking up is valued at NatWest Group and is a vital part of our culture. We want everyone to feel confident to raise any concerns they have about wrongdoing or misconduct. This applies to all employees and those acting on behalf of or representing NatWest such as contractors, subcontractors, suppliers, temporary colleagues, secondees, consultants, interns and volunteers. This also includes any persons formerly in these roles.

We have multiple processes in place to facilitate this. Colleagues are encouraged to raise concerns through:

1. their line management;
2. the Human Resources (HR) function;
3. the Complaints process;
4. the Speak Up service.

Line management

Colleagues are encouraged to raise concerns through their line management in the first instance. Where managers can address the concerns, these are resolved locally, often with support from HR Policy & Advice. Where colleagues are uncomfortable raising the concerns through line management, or line management are not able to resolve it locally, they can raise their concerns through the People & Transformation function, the Complaints process or through the Speak Up service as appropriate.



Suppliers

Our whistleblowing service, Speak Up, is available to all our suppliers, enabling them to report and raise concerns with NatWest Group about any unethical conduct, including any concerns around human rights. Speak Up is brought to suppliers' attention through our Supplier Charter.

The People and Transformation function

The function has processes in place for addressing colleagues' concerns that relate to issues which may be more appropriately managed and supported by the function. These include:

5. the Resolving Issues at Work process, which supports colleagues who have an issue and/or a grievance about their employment that they wish to resolve informally or formally (this includes the option of mediation);
6. the Redundancy Appeals process, which allows colleagues to lodge an appeal against their selection for redundancy; and
7. the Disciplinary process which supports line managers to address concerns about a colleague's conduct.

Speak Up

NatWest Group operates a whistleblowing service called 'Speak Up'. It enables colleagues to confidentially report any concerns relating to employee wrongdoing or misconduct. Concerns can be raised confidentially (or anonymously if preferred) through a range of methods including a web portal, a telephony service, face-to-face or by contacting the Group's Speak Up team by e-mail, letter or phone. All concerns raised are reviewed and where they qualify as a whistleblowing report, an investigator is assigned to undertake an investigation. Concerns that do not qualify are referred to a more appropriate process such as the Resolving Issues at Work process or the Customer Complaints process.

Training and learning material

Colleagues are expected to undertake regular, mandatory training which helps them to develop capabilities and confidence. Colleagues across NatWest Group are required to undertake training on the following topics which are either directly or indirectly related to human rights:

Speak Up

All colleagues across the Group complete annual training on Speak Up to ensure they are aware of the service and how to raise concerns. The training includes the examples of the types of concerns that can be raised. This includes but is not limited to:

1. conduct and behaviour that falls short of Our Code, including sexual harassment or discrimination;
2. criminal activity including authorisation breaches and theft, or involvement in the facilitation of human slavery;
3. breaches of regulatory or legal requirements (such as financial services regulators' rules and regulations, data protection law and competition law);
4. breaches of NatWest Group policies, procedures or customer treatment standards (such as mis-selling); and
5. other risks or dangers at work (such as breaches of IT security/health and safety).

Specialist training is also completed annually by colleagues in our Investigations, People & Transformation and Internal Audit teams who are involved in addressing the concerns raised by colleagues.

Health and safety

All employees are required to complete mandatory online health and safety training, which covers the key risks for all employees including fire safety, display screen equipment, manual handling and slips, trips and falls. It includes specific content for people and building managers of their H&S responsibilities. The building manager section covers workplace management responsibilities and includes learning on asbestos, façades, fire emergency plans, risk assessments, emergency roles and escape route checks. We also have job-specific training for specialist roles, for example where driving is required on business we have an occupational road risk programme.

Privacy and client confidentiality

All colleagues across the Group are required to complete training on privacy, which examines the importance of processing personal data lawfully and the rights individuals have in relation to their personal data. Further bespoke training is provided as necessary for specific colleagues based upon their job roles.

Diversity, Equity and Inclusion

All colleagues are required to complete diversity, equity and inclusion learning with videos focussing on colleagues 'lived experience'. Video participants share barriers they have encountered and how they champion inclusive behaviours, helping to raise awareness and build understanding of difference.

Our Code

All colleagues are required to complete training on the purpose of Our Code, the Yes Check and how these apply to colleagues and where to go for support. This also includes reference to Speak Up, Our Values and Our Critical People Capabilities with scenario-based content to ensure the learner understands their role in applying Our Code in day-to-day working life.

Financial crime

All colleagues are required to complete financial crime training which focusses on financial crime and fraud, sanctions, anti-money laundering and bribery and corruption.

In addition to mandatory training, colleagues are offered a wide range of learning which can be role specific or for personal development on topics related to human rights such as modern slavery and human trafficking.

Engaging with stakeholders

How we engaged



We engage regularly with our customers – both individuals and businesses that we serve.

Customers

We engage with individual customers face to face through our branch network, mobile branches and customer support specialists, as well as through other channels such as video banking, telephony and our secure messaging service. We regularly engage with businesses through Bankline for our business and commercial customers.

We support customers on their financial wellbeing, goals and plans; our products and services; and advice around avoiding fraud and scams. We support businesses by removing barriers to enterprise and their transition to net zero plans.



We seek to engage and involve our colleagues in our decision-making, ensuring their views and opinions are heard.

Colleagues

Our colleague listening strategy includes our colleague opinion surveys; a 'Colleague Advisory Panel' (CAP) that connects colleagues directly with our Board; the Colleague Experience Squad, a group of colleagues who volunteer to provide feedback on colleague products and services; and 'Workplace', our social media platform. NatWest Group has a variety of employee-organised and led groups, known as Employee Led Networks. They are made up of volunteer colleagues and play a significant role in delivering, raising awareness of and influencing our Group-wide diversity, equity and inclusion strategy.

We hold regular interactions with our employee representatives such as trade unions, elected employee bodies and works councils and they are a vital means of transparency and engagement for us. We frequently use these sessions to discuss developments and update on the progress of our strategic priorities.



We engage with charitable organisations, NGOs and campaign groups.

Communities

We support charities through payroll giving, colleague fundraising and volunteering and disaster and emergency appeals.

We engage with charities, NGOs, campaign groups and think tanks on a range of issues related to human rights. We are a member of both the Thun Group and the UNGC Modern Slavery Working Group, through which we engage with other organisations as well as NGOs and charities on human rights-related issues. Participation in these working groups helps to inform our activity and to identify opportunities to continually improve our approach.



We collaborate with our suppliers to encourage and enable a diverse supply chain that is not only sustainable but also has a positive impact on the global community. Supply chain managers are continually trained internally on onboarding and performance management of suppliers, as well as on key ESG topics such as human rights to equip them with the knowledge and skills to drive forward supplier discussions and activity.

Suppliers

We engage with our suppliers through regular review meetings, policy due diligence activity and audits. We worked with EcoVadis – a leading organisation providing third-party evidence-based assessments of sustainability performance – to measure our own performance and that of our suppliers against our Supplier Charter, enabling us to identify social, environmental and ethical improvements. We also discussed prompt payment and managing supply chain-related risks including human rights infringements. The NatWest Group Board received regular updates on key supplier relations via business review reporting from the executive team, providing visibility of key supplier activity and how this supports our purpose.

Approval

This statement was drafted and developed by our Sustainable Banking team with input from relevant functions and franchises.

It was discussed at the Human Right Steering Group and the Sustainable Banking Committee, noted by the Executive Committee and approved by the Board of NatWest Group plc on 15th December 2022.

Signed on behalf of NatWest plc and its relevant subsidiaries.

Alison Rose

Chief Executive, NatWest Group plc



15th December 2022

Howard Davies

Chairman, NatWest Group plc



15th December 2022

Appendix (including further disclosures)

This statement forms part of our human rights disclosures. To gain a full picture of all the activity that we undertake in this space, this statement should be read in conjunction with:

- **NWG Modern Slavery Statement**
- **NWG ESG Supplement**
- **NWG Annual Report and Accounts**
- **UN Principles for Responsible Banking Reporting 2021/2022**
- **ESE Risk Policy Positions**
- **ESE Risk Concerns Process**
- **Resolving Issues at Work**
- **NWG Supplier Charter**
- **Our Code**
- **Speak Up policy**
- **Injury and Harm Risk Standard**
- **Financial Crime Statement**
- **Tax Responsibilities and Payments**
- **Coutts B Corp Impact Report**
- **Giving and Governance webpage**

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