



NatWest  
Group

# NatWest Group Human Rights Statement

## Contents Page

<b>1. Introduction</b>	p2
<b>2. Our approach</b>	p2
<b>3. Modern Slavery Act</b>	p3
<b>4. Scope</b>	p3
<b>5. Colleagues</b>	p3
5.1 Our culture	p3
5.2 Protecting colleagues' rights	p3
5.3 Building an inclusive bank	p3
5.4 Raising a concern	p4
5.5 Feedback and evaluation	p4
<b>6. Suppliers</b>	p5
6.1 Raising a concern	p5
<b>7. Customers and our responsibilities as a financial services provider</b>	p5
7.1 Commercial customers	p5
7.2 Retail banking customers: inclusive and accessible products	p5
7.3 Responsible investing	p6
7.4 Tackling financial crime	p7
7.4.1 Anti-bribery and corruption (ABC)	p7
7.5 Data protection and privacy	p7
7.6 Raising a concern	p7
<b>8. Communities</b>	p8
8.1 Tackling climate change	p8
8.2 Supporting enterprise	p8
8.3 Supporting learning and building financial confidence	p8
8.4 Raising a concern	p8
<b>9. Governance</b>	p9
<b>10. Further Information</b>	p9

## 1. Introduction

NatWest Group is a financial services company providing a range of products and services to personal, commercial, large corporate and institutional customers. We are a UK-centred bank with our headquarters in Edinburgh but also support our customers to access international markets in Europe, Asia and the U.S.

Our purpose is to **champion potential, helping people, families and businesses to thrive**. This lies at the core of our activity as we strive to create long term, deeper relationships with our customers. At the heart of our purpose is a clear commitment to people – to value, support, empower them and ultimately enable them to thrive. Respect for human rights is linked to our purpose, reflected in [Our values](#) and we seek to embed it throughout our business. We strive to be an open and inclusive business that supports respect for human rights whilst also seeking to identify and mitigate any negative impacts that our activities may have on individuals or communities.

The purpose of this statement is to:

- provide an overview of how we strive to respect human rights:
  - as an employer
  - with our suppliers
  - with our customers
  - through responsible investments
  - within the communities we serve
- provide information on how colleagues, suppliers, customers and communities can raise concerns
- demonstrate to key external stakeholders how we manage human rights risks.

## 2. Our approach

At NatWest Group, we understand that respecting human rights is the right thing to do. We do not tolerate or condone abuse of human rights within our business, supply chain or within our sphere of influence.

Through our policies and approach, we seek to identify and mitigate adverse human rights abuses relating to our colleagues, suppliers and customers.

Understanding the importance of human rights, our approach is guided by the United Nations Guiding Principles on Business and Human Rights and has been informed by The Equator Principles; International Labour Organisation's Declaration of Fundamental Principles and Rights at Work; OECD Guidelines for Multinational Enterprises; United Nations Global Compact; Universal Declaration of Human Rights; Women Empowerment Principles and the Living Wage Foundation. Through our efforts to respect human rights, we aim to support the UN Sustainable Development Goals (SDG), a global agenda to end poverty, protect the planet and ensure prosperity for all.

Our approach to respect human rights is aligned to our purpose and core values of 'Doing the right thing' and 'Thinking long term'. It is built around:

- our commitment to comply with international human rights legislation and standards
- our respect for employment legislation and policies that create a safe, inclusive, respectful workplace
- our Environment, Social and Ethical (ESE) risk acceptance positions on industry sectors where enhanced due diligence is conducted
- our policies which strive to align our high-risk commercial customers' and suppliers' behaviour with our own standards.

NatWest Group engages on the responsibilities of businesses in respecting human rights. We are a member of the Thun Group, which discusses how the financial service sector can incorporate and embed the UN Guiding Principles into their due diligence processes. We also participate in several indices and benchmarks which help to inform our activity and identify opportunities to continually improve our approach.

### 3. Modern Slavery Act

NatWest Group supported the adoption of the Modern Slavery Act 2015 in the UK and we continue to tackle modern slavery by monitoring our financing and supply chain against involvement in this activity. We aim to achieve this through continued implementation of policies covering our colleagues, suppliers and customers. Our most recent annual Modern Slavery Act Statement can be found [here](#).

### 4. Scope

This statement applies to NatWest Group plc including its subsidiaries. A full list of our subsidiaries can be found in our [Annual Report and Accounts](#).

This statement sets out guidance for assessing and managing relationships with colleagues, suppliers, customers and communities.

### 5. Colleagues

The launch of our new purpose in 2020 underpins the way that we do business. This includes helping colleagues to achieve their full potential within a respectful, inclusive and fair workplace. 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 and inclusive workplace.

#### 5.1 Our culture

Our culture is underpinned by our Code of Conduct which supports our colleagues to achieve the best outcomes for our customers by adhering to ethical standards. The Code includes a “Yes Check” decision-making framework which helps our colleagues to use good judgement and act with integrity, openness and fairness.

#### 5.2 Protecting colleagues’ rights

We have implemented a range of policies that outline our duties as a responsible employer. These policies promote human rights directly or indirectly covering a range of issues including:

- [Code of Conduct](#)
- [Employment Practices](#)
- [Creating a healthy culture](#)
- [Building a more inclusive bank](#)
- [Performance and Reward remuneration](#)
- [Health and safety](#)
- [Speak Up – Our Whistleblowing policy](#)

We recognise colleagues’ fundamental rights to form and associate with Unions and representative bodies. Approximately 72% of our colleagues are covered by a collective agreement and/or local employee representative.

#### 5.3 Building an inclusive bank

We are building an inclusive bank with clear plans and targets that apply globally and are formed round five key priorities: gender balance; disability smart; ethnically diverse; LGBT+ and creating an inclusive culture.

To support the development of an inclusive mindset we run an annual inclusion e-learning module, which is compulsory for all NatWest Group colleagues. The majority (80%) of colleagues have completed our Unconscious Bias training programme. We have introduced Good Judgement training, a scenario-based learning module which encourages discussions about how to create an inclusive culture.

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 inclusion strategy.

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.

#### 5.4 Raising a concern

Speaking up is part of our culture. All our colleagues are encouraged to raise concerns if they become aware of any wrongdoing or misconduct. This applies to permanent employees, temporary employees and secondees, former employees, contractors and those acting on our behalf of or representing us, such as consultants.

We have multiple processes in place to facilitate this. Colleagues are encouraged to raise concerns through their line management, the Human Resources (HR) function, the complaints process or through 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 the concerns through Human Resources function, the Complaints process or through the Speak Up service as appropriate.
- **Our Human Resources function** has processes in place for addressing colleagues' concerns that relate to issues which may be more appropriately managed and supported by HR. These include:
  - 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
  - Redundancy Appeals process which allows colleagues to lodge an appeal against their selection for redundancy
  - Disciplinary process which supports line managers to address concerns about a colleague's conduct
- **Speak Up** – NatWest Group operates an independent 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 through a range of methods including a web portal, a telephony service, a mobile app or by contacting the Group's Speak Up team. 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.

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:

- conduct and behaviour that falls short of Our Code, including sexual harassment
- breaches of regulatory or legal requirements (such as financial services regulators' rules and regulations, data protection law and competition law)
- criminal activity including authorisation breaches and theft
- breaches of NatWest Group policies, procedures or customer treatment standards (such as mis-selling)
- 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, Human Resources and Internal Audit teams who are involved in addressing the concerns raised by colleagues.

#### 5.5 Feedback and evaluation

We constantly monitor the effectiveness of our policies, gathering feedback from our colleagues through our listening strategy which includes our colleague opinion survey; a Colleague Advisory Panel which connects colleagues directly with the Group Board; and 'Workplace', our social media platform. We also track metrics and key performance indicators and feedback from regulators and industry bodies, including the Banking Standards Board's (BSB) annual assessment of culture in the UK banking sector.

## 6. Suppliers

At NatWest Group, we expect suppliers to uphold the same values and commitments we have in relation to human rights. These requirements are set out in our [Supplier Charter](#) which, replaced our previous Supplier Code of Conduct. Adherence to these commitments is required as part of our supply chain tendering process and throughout the life of the supplier engagement.

Suppliers are expected to implement the commitments of the Supplier Charter, including those around human rights such as meeting international labour standards, with all their own suppliers. Our supplier tendering process includes specific questions in relation to modern slavery which asks them to evidence that their company is operating in line with international standards and legislation such as the Modern Slavery Act and International Labour Organisation (ILO) convention.

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 the Group's operational risk process. This includes engagement with the supplier to offer support and identify possible remediation measures.

### 6.1 Raising a concern

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.

## 7. Customers and our responsibilities as financial services provider

### 7.1 Commercial customers

We conduct due diligence on commercial customers in line with regulatory expectations and expect them to share our commitment to respect human rights within both their operations and supply chain. We do not tolerate or condone abuse of human rights which includes harmful child labour, forced labour, modern slavery and human trafficking.

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 operate an [ESE risk management framework](#) which has been live since 2011. As part of this process, we conduct due diligence on customers, projects and transactions that present heightened ESE risk. We also expect our customers to adhere to local and international environmental, social and human rights standards.

NatWest Group has developed ESE risk acceptance positions on industry sectors where further-due diligence is conducted, and where relevant enhanced due diligence or targeted enhanced due diligence is also completed. We also perform assessments on customers or transactions in other sectors where ESE risk concerns are identified.

Our ESE risk acceptance positions define the level of ESE risk the bank is prepared to accept, and our expectations of companies to manage ESE risks in the relevant sectors. They are reviewed and updated regularly to take account of changes in regulation and our own standards as we strive to be purpose led.

### 7.2 Retail banking customers: inclusive and accessible products

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. We also work with charities, partner organisations and trade bodies to provide additional support to customers in vulnerable situations such as victims of financial abuse, 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](#) which has been specially designed to be easier for customers with conditions such as visual impairment and dementia to recognise and use. We have translation services available for over 50 languages and can arrange for an interpreter or translation free of charge, while our new cash machines have the talking ATM feature added. 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. We have recently introduced [Banking My Way](#) 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.

### 7.3 Responsible investing

Along with other major UK banks, NatWest Group is required by UK law to separate everyday banking services from investment banking. This separation is called ring-fencing and applies to any UK bank with at least £25bn of core deposits in the European Economic Area (EEA).

NatWest Markets (NWM), which sits outside the ring-fence bank, helps corporate and institutional customers manage their financial risks and achieve their short and long-term financial goals while navigating changing markets and regulation. It does this by providing global market access, financing, risk management and trading solutions. NWM continues to develop its track record in Environmental Social Governance (ESG) and has established an ESG product framework that facilitates investments in high ESG-rated assets.

Coutts Asset Management, which sits inside the ring-fenced bank, provides Investment Services on behalf of clients. In 2018 Coutts became a signatory of the UN Principles for Responsible Investment (PRI) as part of a commitment to embed responsible investing into its processes and philosophy. In 2020 the PRI gave Coutts an 'A+' in its annual assessment for how it adopts responsible investing – the highest possible grade.

Coutts expects the companies which it invests in to have strategies in place to address ESG:

- Environmental – the impact a company has on the environment. This includes carbon emissions, deforestation, water usage and packaging
- Social - the impact a company has on society. This includes the processes and procedures a company has in place to uphold and respect human rights such as how it treats its employees, making sure supply chains avoid unethical labour practices, and the health impacts of its products
- Governance - the impact a company has on the business environment. This includes its accounting practices, how it negotiates with suppliers, its attitude to diversity and how it contributes to a fair and stable market environment.

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.

## 7.4 Tackling financial crime

NatWest Group seeks to combat financial crime and the misuse of our assets and systems by criminals. We are determined to take a proactive approach to financial crime risk and meet our national and international regulatory obligations for anti-money laundering, counter-terrorist financing, anti-bribery & corruption, anti-tax evasion, sanctions and fraud.

### 7.4.1 Anti-bribery and corruption (ABC)

NatWest Group recognises that corruption and bribery can have devastating impacts causing economic harm and undermining human rights. They can reduce the availability, quality and accessibility of goods and services, exacerbating poverty and marginalising certain groups in society. We therefore have a responsibility to combat financial crime and are firmly committed to acting with integrity, fairness and due diligence when pursuing business opportunities and when awarding business.

We have implemented a suite of policies - covering our colleagues, third parties (including suppliers, sponsorships and charities) and customers - which are designed to identify and prevent potential bribery and corruption. These policies strive for the highest standard of governance and ethical conduct. We do not compromise on the legal, regulatory or policy requirements that govern our activity. Our commitment to ethical behaviour and conduct means that we seek to abide by not only the letter, but also the spirit, of applicable laws and regulation.

Responsibility for the ABC programme rests with the Board who promote and encourage a policy of zero tolerance towards bribery and corruption.

We provide comprehensive training on anti-bribery and corruption, including mandatory annual online learning, to help to upskill colleagues on the key areas of the Group's internal anti-bribery & corruption framework.

## 7.5 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 and 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.

We provide comprehensive training on privacy to all colleagues within the Group, including mandatory annual online learning, and bespoke training as necessary for specific colleagues based upon their job roles.

## 7.6 Raising a concern

A customer can raise a concern or express their dissatisfaction with any element of the service they 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 or wrongdoing, it is referred to one of the specialist NatWest Group Investigations teams.

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.

## 8. Communities

Our purpose is supported by commitments in three focus areas: tackling climate change, supporting enterprise, and learning (both for our colleagues and our customers, through financial capability interventions for children and adults). By delivering our purpose, we hope to tackle traditional barriers, develop new opportunities and help to create a greener, fairer, more inclusive society where all individuals can thrive.

### 8.1 Tackling climate change

NatWest Group supports communities in their right to live in a healthy and clean environment and we seek to minimise any negative environmental impacts our activity may have. We have many years' experience in supporting our customers' transition to a low carbon economy. Our new purpose-led strategy includes Climate Change as a key focus area and through this commitment, we strive to make a meaningful contribution to the UN Sustainable Development Goals on climate action (SDG 13) and affordable and clean energy (SDG 7). We intend to do what is necessary to achieve alignment with the 2015 Paris Agreement. This includes making our own operations net carbon zero in 2020 and climate positive by 2025, and by driving material reductions in the climate impact of our financing activity by halving our impact by 2030.

### 8.2 Supporting enterprise

As the UK's leading business bank, we offer a wide range of services to people who want to start a business or scale-up. At the heart of our support for entrepreneurs is our Entrepreneur Accelerator, a comprehensive programme of free mentoring, insight and bespoke coaching, specifically designed to meet the needs of entrepreneurs who want to grow and scale their business. We also want to help create new businesses by inspiring and supporting people to consider enterprise as a career option. We have developed initiatives which focus on supporting people and communities who traditionally face the highest barriers to entry, including dedicated programmes to support female entrepreneurs. We also led the UK Government commissioned Alison Rose Review into Female Entrepreneurship. Our Dream Bigger initiative encourages young women in UK secondary schools to consider science, technology, engineering and maths (STEM) and entrepreneurship as career options, while Back her Business is the first female only crowd funding programme that supports would be entrepreneurs. In addition, our Prince's Trust Enterprise Programme is designed to help young people start up in business regardless of their background. Through these initiatives, we aim to tackle the barriers to starting a business, create more opportunities for businesses to thrive and contribute towards an inclusive economy that generates decent and empowering jobs. Our enterprise activity seeks to make positive contributions to SDG 5 gender equality and SDG 8 decent work and economic growth.

### 8.4 Supporting learning and building financial confidence

At NatWest Group supporting financial capability goes beyond delivering fair products and great service. It also means helping customers, wider society and future generations to develop good money management skills, so they are empowered to make better financial decisions. As part of our purpose, we have a commitment to improving financial health and have set specific targets around financial capability interactions and helping customers start to save. Through our financial education programme, MoneySense, and our free educational game, Island Saver, we help children throughout the UK learn about good money management. Our learning and financial capability activities seek to make positive contributions to SDG 4 quality education and SDG 10 reduced inequalities.

### 8.5 Raising a concern

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) 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.

## 9. Governance

Our approach to human rights is co-ordinated by the Sustainable Banking team with input from relevant Group functions and business areas.

A human rights working group with representatives from Group functions and business areas has been established and meets bimonthly. This policy is reviewed annually and updated as required.

This statement was reviewed by the Group Reputational Risk Committee, the Board Level Sustainable Banking Committee, noted at Group Executive Committee, and approved by NatWest Group Board on 29<sup>th</sup> October 2020.

## 10. Further Information:

For further information on our approach to Human Rights and Modern Slavery, please click [here](#)

For further information about Coutts and responsible investing, please click [here](#)

For more information about NWM ESG Product Framework, please click [here](#)

For further information on our alignment to Sustainable Development Goals, please click [here](#)

For further information on our external commitments, including becoming a founding signatory of the Principles for Responsible Banking in September 2019, please visit:

[Awards and recognition](#)

[Equator Principles](#)

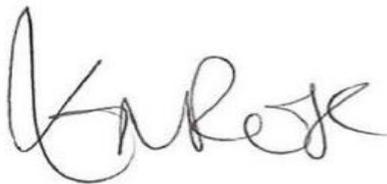
[External commitments](#)

[Stakeholder engagement](#)

[Sustainable banking at NatWest Group](#)

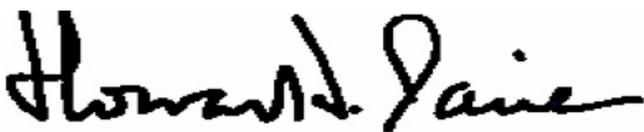
[Tax responsibilities & payments](#)

[Anti-Money Laundering and Sanctions](#)



**Alison Rose**, Chief Executive

19<sup>th</sup> November 2020



**Howard Davies**, Chairman

19<sup>th</sup> November 2020