

NatWest Group Plc

# Supplier Code of Conduct

This document describes our commitments to suppliers and our ethical expectations of the companies that we work with

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## Table of Contents

Introduction.....	3
Our commitments .....	3
Our expectations of suppliers.....	4
Unethical and/or unsustainable practices .....	4
Definitions .....	5
Relevant NatWest Group Policies .....	6
Standards & Principles.....	6
Reporting Initiatives .....	6
More information on becoming a supplier to NatWest Group....	6

## Introduction

This Supplier Code of Conduct applies to all third party suppliers who provide goods and services to and on behalf of NatWest Group.

As part of our long term objectives as a business, we are committed to managing the wider social, environmental and economic impacts of our operations to ensure a positive influence on the places and people we work with, and the global community as a whole. This approach covers all aspects of our business, including the way we treat our customers, the policies which dictate our lending to high-impact sectors, and the way in which we manage sustainability issues in our supply chain.

The size of our business means we purchase goods and services from a large number of suppliers. Our relationships with these suppliers are based on fairness, transparency and integrity. We expect suppliers to uphold the same values and commitments that we have made in relation to human and environmental impacts and to manage their approach to sustainability effectively and for the long term.

We have gained accreditation as a Living Wage Employer from the Living Wage Foundation. This means that as well as paying our own employees the UK Living Wage, we committed to extend it to our contractors and suppliers across the UK.

Suppliers are expected to implement the standards of this code with their own suppliers.

## Section 1: Our Commitments

When building sustainable supplier relationships we are committed to:

- Treating our suppliers with integrity and respect
- Conducting our supplier tendering and assessment process in a fair and honest manner, with openness and integrity, in line with legal and regulatory requirements
- Promoting the principles of inclusion and diversity
- Engaging with suppliers in line with our internal Supply Chain Policy, which sets out key controls covering operational, regulatory, legal and business risk
- Paying our suppliers promptly and giving them clear guidance on our payment procedures
- Carrying out regular sustainability assessments of our key suppliers, such as screening our suppliers periodically, including against applicable sanctions lists
- Making whistleblowing channels available, allowing suppliers to report unethical conduct with regards to their relationship with NatWest Group ([NatWest Group Whistleblowing Service Worldwide](#))
- Encouraging and supporting supplier improvement through working collaboratively, development of improvement plans and encouragement of best standards
- Regularly reviewing this code and making any necessary updates to ensure it remains fit for purpose

## Section 2: Our expectations of suppliers

We expect our suppliers to prioritise the following:

### Community

- Respect the human rights of the local communities within their business operations
- Develop or support initiatives which help support and strengthen communities

### Diversity & Inclusion

- Eliminate all forms of discrimination on the grounds of race, ethnicity, gender identity, sexuality, age or disability
- Comply with the Equality Act (2010) by ensuring that all products, services, devices and environments are fully inclusive and accessible for customers, clients and staff

### Environment

- As a minimum, to abide by all legislation and regulations relating to the protection of the environment
- Manage their operations in accordance with good environmental practice, including policies and procedures to reduce greenhouse gas emissions, energy use, water use, waste generation, consumption of finite natural resources and pollution of land, air and water
- Develop products and services which can be utilised to help improve our own environmental performance

### Standards & Principles

- Sign up to relevant codes of industry best practice and voluntary standards
- Where relevant, follow the same codes of standards and principles to which NatWest Group is committed to upholding
- Ensure that as a supplier to NatWest Group, pursuant to an Order issued to NatWest Group by the Federal Reserve, that ex-NatWest Group staff can never be used to deliver services back into NatWest Group if they have; participated in any misconduct in relation to the Foreign Exchange Market; and, been subject to formal disciplinary action as a result of NatWest Group's internal disciplinary review in connection with the misconduct; and, left NatWest Group or a subsidiary of NatWest Group or had his/her employment terminated in connection with the misconduct

### Sustainability Risk Management

- Identify and help mitigate environmental, social and ethical risks that exist within their sector and their own supply chain

## Section 3: Unethical and/or unsustainable practices

Suppliers shall not engage in any of the following:

### Legal and regulatory non-compliance

- Any failure to adhere to applicable national and international laws and regulations

#### Bribery and corruption

- Corruption, extortion or bribery

#### Sanctions breaches

- Provide services to NatWest Group from a territory subject to comprehensive sanctions

#### Tax evasion

- Committing or facilitating tax evasion

#### Misuse of data

- Failure to meet data protection requirements for staff, customers and clients

#### Discrimination

- Discrimination on the basis of race, ethnicity, gender, sexuality, age or disability

#### Environmental impact

- Environmental damage to nationally or internationally protected areas including UNESCO World Heritage sites, Ramsar sites, Man & Biosphere sites, and FSC High Conservation Value Forests
- Damage to plants and animals listed on the IUCN Red List of critically endangered species

#### Human rights breaches

- Failure to support and respect the protection of internationally proclaimed human rights

#### Labour standards breaches

- Child labour, including but not limited to Article 3 ILO Convention 182
- Forced labour, as defined by the ILO Convention C029
- Failure to meet the requirements of the Modern Slavery Act, which covers the offences of slavery, servitude, forced and compulsory labour and human trafficking
- Failure to uphold the freedom of association and the effective recognition of the right to collective bargaining
- Failure to meet minimum wage requirements and provide a healthy and safe working environment in accordance with national and international legislation
- Failure to ensure that working hours are in accordance with local regulation and industry practice
- Failure to provide grievance mechanisms for own workforce

## Further Information

### Definitions

- Child Labour: <http://www.ilo.org/ipec/facts/lang--en/index.htm>
- Forced Labour: <http://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>
- Modern Slavery Act: <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
- Freedom of Association: <http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/freedom-of-association/lang--en/index.htm>

### Relevant NatWest Group Policies

- [Code of Conduct](#)
- [Technology Accessibility Standards](#)
- [Anti-Bribery and Corruption Statement](#)
- [Anti-Money Laundering Statement](#)
- [Environmental Social & Ethical Risk Policy Summary](#)
- [Position on Human Rights](#)
- [Whistleblowing Service Worldwide](#)
- [Managing Tax Evasion Risk](#)

### Standards & Principles that NatWest Group is subject or signatory to

- [The Equator Principles](#)
- [The International Labour Organisation's Declaration of Fundamental Principles and Rights at Work](#)
- [The OECD Guidelines for Multinational Enterprises](#)
- [The Prompt Payment Code](#)
- [The Rio Declaration on Environment and Development](#)
- [The United Nations Global Compact](#)
- [The Universal Declaration of Human Rights](#)
- [The United Nations Guiding Principles on Business and Human Rights](#)
- [The United Nations Environment Programme Finance Initiative](#)
- [The Women Empowerment Principles](#)
- [Living Wage Foundation](#)

### Reporting initiatives

- [AA1000 \(2008\) Assurance standard](#)
- [Carbon Disclosure Project](#)
- [Global Reporting Initiative](#)