



NatWest  
Group

# This is Our Code

We champion  
potential, helping  
people, families and  
businesses to thrive.

# This is Our Code

**How we behave with others determines if people want to do business with us, work for us and welcome us as part of their community.**

When we do the right thing, our customers trust and value us, which in turn means we can all take pride in the company we work for.

Our history shows us that we rise and fall as one company, which is why the integrity of Our Code rests in the hands of every individual in the NatWest Group. There are many of us, and we each carry the same responsibility to each other to ensure we live by our values and purpose.

Our Code, our purpose, the values and behaviours within it, connects us all. If one of us breaks the Code, it can affect us all.

There will always be times when we are unsure of what to do. In these instances, it is our duty to look for guidance.

The simplest form of guidance is the YES check contained within Our Code. Its purpose is to help us to ask the right questions and make the right decisions every day.

**This is Our Code. It helps each and every one of us to do the right thing. Please use it.**

## **Our Code is for all of us**

How we behave affects our customers and the Group.

How our temporary workers, contractors and agency workers behave affects our customers and the Group.

How our suppliers and third parties behave affects our customers and the Group, so we choose to work with third parties who sign up to our values.

So Our Code is for everyone. It sets out what we expect of each other, and what our customers and communities expect of us.

# What we believe

**Every decision and action is shaped by the purpose, focus, values and behaviours of the Group.**

## **Our Purpose**

We champion potential, helping people, families and businesses to thrive.

## **Our Focus**

Enterprise and the barriers that too many face to starting a business.

Learning, and improving financial capability and confidence for our customers.

Establishing a dynamic learning culture for our employees.

Climate and the role we can play in accelerating the transition to a low carbon economy.

## **Our Values**

### **Serving customers**

We exist to serve customers.

We earn their trust by focusing on their needs and delivering excellent service.

### **Working together**

We care for each other and work best as one team. We bring the best of ourselves to work and support one another to realise our potential.

### **Doing the right thing**

We do the right thing.

We take risk seriously and manage it prudently. We prize fairness and inclusion and exercise judgement with thought and integrity.

### **Thinking long term**

We know we succeed only when our customers and communities succeed.

We do business in an open, direct and sustainable way. All this comes together in Our Code.

# How we work

**Four key tools  
guide the way  
we work together.**

## **How we work**

Our Code

## **How we think**

The YES check

## **How we behave**

Conduct Rules and  
CPC behaviours

## **How we do things**

Our policies

## **Our Code**

This lays out the standards that support our values. It explains the effect of decisions that are taken and describes the principles and policies that must be followed.

## **The YES check**

This guides the way we think and the judgements behind our decisions and actions.

## **Our Conduct Rules and Critical People Capabilities**

The Conduct Rules and Critical People Capability (CPC) Behaviours describe ‘how’ we should approach our jobs. They show us how to behave every day.

## **Our Policies**

These inform how we do things. They outline the expectations of the Group, customers and regulators, and processes and procedures that must be followed.

# How we think

## The YES check

Our customers, colleagues and the communities in which we do business trust each of us to be thoughtful and professional in everything we do.

They expect each of us to exercise good judgement and to do the right thing.

We use our values to help think through decisions and make sure we do the right thing. When in doubt, we use the YES check for guidance.

Decisions are not always straightforward. The YES check can help us. It's a tool, not a rule.

Ask yourself...

### **1. Does what I am doing keep our customers and the Group safe and secure?**

Consider the impact of what you are doing. Rehearse a briefing with your boss.

### **2. Would customers and colleagues say I am acting with integrity?**

Consider: Would I do this to someone in my family or a friend? Would I do it to myself?

### **3. Am I happy with how this would be perceived on the outside?**

Consider the impact of this in the outside world. Try writing the press release – does it sound good for customers?

### **4. Is what I am doing meeting the standards of conduct required?**

Think. If you are unsure then seek a second opinion.

### **5. In 5 years' time would others see this as a good way to work?**

Will this have a positive impact? Imagine writing it on your CV.

# How we behave

**The Financial Conduct Authority (FCA) sets out expectations of individual behaviour through a clear set of regulatory Conduct Rules.**

**The Conduct Rules reinforce Our Values. They hold us to account for our actions and behaviours.**

Living by these Individual Conduct Rules, together with Our Values, YES check and policies, ensures we are taking individual accountability to:

Deliver good customer outcomes.

Build trust in our Group for our people, customers, communities and shareholders. Meet our regulatory obligations.

These rules apply to us all no matter which part of the Group you work in or where.

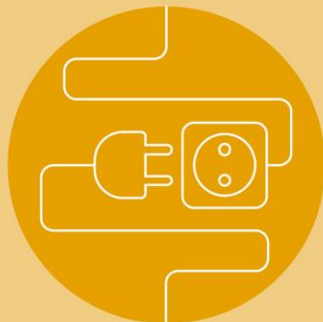
## **Individual Conduct Rules**

- 1. You must act with integrity**
- 2. You must act with due skill, care and diligence**
- 3. You must be open and cooperative with the Financial Conduct Authority (FCA), the Prudential Regulation Authority (PRA), and other regulators**
- 4. You must pay due regard to the interests of customers and treat them fairly**
- 5. You must observe proper standards of market conduct**

The FCA also sets out clear expectations for our most senior leaders, and a further set of regulatory Conduct Rules apply to them. If you are affected by these, you will receive information and support on an individual basis.

# How we behave

**Guiding how we behave today and preparing us for the future.**



## Critical People Capabilities

Our Critical People Capabilities help us build the right knowledge, skills and behaviours to do our jobs effectively.

They are aligned to what we believe and support our risk culture so that we deliver for our customers and each other.

## Our CPC Behaviours

1. Improver Innovator
2. Change Ready
3. Critical Thinking
4. Connected
5. Trusted Advisor

# How we behave



## Improver Innovator

### CPC Behaviours say...

We generate ideas and use innovative ways of thinking and working.

We learn from experience and mistakes, we use this to make improvements.

We have a digital and technological mind-set, we use digital tools effectively.

We continuously improve and simplify for customers.



## Change Ready

### CPC Behaviours say...

We support our own wellbeing and resilience.

We adopt a learning mind-set; we are curious and keen to learn new things.

We have a positive orientation towards change and ambiguity; we show adaptability and agility.

We can work at pace, and still deliver quality work.



## Critical Thinker

### CPC Behaviours say...

We gather information and data through research and insight.

We solve problems and make sound decisions.

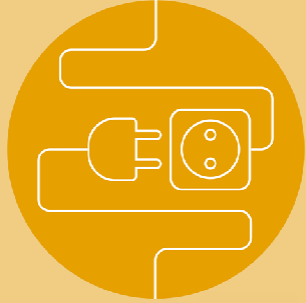
We constructively challenge decisions of others and we're open to challenge.

We have attention to detail and produce accurate and high quality work.

We think strategically and make the connection to Group purpose, goals and risk appetite.



# How we behave



## Connected

### CPC Behaviours say...

We are positive about collaboration, and we collaborate purposefully.

We respect and value differences in others.

We listen, coach and provide feedback to others. We share information and influence others.



## Trusted Advisor

### CPC Behaviours say...

We build relationships and trust.

We have care, empathy and emotional intelligence.

We demonstrate high ethical standards and do the right thing.

We build expertise and demonstrate credibility.

We scan the external environment with the customer in mind.

More information on our CPC Behaviours can be found at [HR > HR Information > Learning > Help me Develop myself > Critical People Capabilities](#).

# How we do things

**The Group's policies describe in more detail the rules that everyone is expected to follow.**

They ensure we comply with the legal and regulatory requirements that are critical in a highly regulated industry. By following our policies, our approach to risk management is consistent and will keep us and our customers safe and secure. We also have local country policies designed in line with country laws and regulations.

We take personal responsibility for ensuring we are familiar with the Group's policies relevant to our role.

## **Some of the key policies and guidance are:**

- Anti Bribery and Corruption
- Anti Money Laundering
- Competition Policy
- External Engagement
- Market Abuse and Inside Information
- Health, Safety and Environment
- Managing Conflict
- Managing Records
- Performance Management
- Personal Account Dealing
- Privacy and Client Confidentiality
- Sanctions
- Security
- Speak Up
- Travel & Entertainment

# How we do things

**We all have a responsibility to speak up if something is wrong.**

We all have a responsibility to speak up if something is wrong and will affect NatWest Group, its customers, employees, shareholders or the general public. This includes behaviour which is not in line with Our Code, breaches our internal policies and procedures, or is illegal.

Raising a concern is acting in accordance with a key NatWest Group value: Doing the Right Thing.

You do not need to have proof that the activity being reported has been, is being or is likely to be committed – you just need to have a reasonable belief.

## How to speak up

You can raise your concerns with a colleague, through your line manager or through the dedicated whistleblowing service 'Speak Up'. Speak Up is an independent, confidential 24/7 telephone, mobile app and web-based service operated on behalf of NatWest Group using a third-party supplier, Expolink. The Group's Speak Up framework is designed to provide a safe and secure environment to speak up, enabling you to raise any concern you may have about wrongdoing or misconduct at an early stage and in the right way.

All concerns raised through Speak Up are treated confidentially, meaning that your name and contact details will not be shared outside of the Speak Up investigation unless required for legal purposes. However, you do have the option to remain anonymous if you would prefer not to share your name or contact details.

NatWest Group treats whistleblowing seriously. We will consider every concern reported. Where appropriate, we will allocate an independent investigator to examine the issues raised to establish the underlying facts. Depending on the investigation findings, appropriate and proportionate action will be taken to address any issues identified.

You will be protected should you suffer any form of reprisal – including harassment, victimisation or discrimination – as a result of raising genuine concerns. The mistreatment of anyone raising a concern will be viewed as a disciplinary matter. Depending on the nature of the concern being raised you may also be afforded protection under local laws. For example, in the UK, employees may also have additional protection under UK law.

You can also report your concerns directly to the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA) in the UK, or your local country regulator. Reporting to the regulator is not conditional on first reporting your concerns internally. There's no requirement for you to raise your concerns internally before, during or after contacting the regulator.

## How to contact us

Visit the Speak Up intranet page for more information, including our Speak Up Policy and contact details for raising a concern through Speak Up.

# How we do things

**Health and wellbeing at work is as important to the Group, as it is to the individual concerned.**

Advice, information, support and short-term counselling on work, money, legal, health or family matters, can be obtained via the intranet Wellbeing pages.

The helpline and counselling service is free and confidential for all the Group staff. It is provided by local suppliers and managed by an external specialist supplier. Everyone is entitled to telephone consulting, online information, resources and toolkits, plus face-to-face counselling.

You and your immediate family can contact our wellbeing supplier through its helpline or online service 24 hours a day, seven days a week.

## **How to contact us**

For the helpline contact details go to HR > HR Information > Wellbeing and select your region.

**Inclusion is at the heart of everything we do at the Group.**

Inclusion is at the heart of everything we do for our colleagues, our customers and the communities we serve. By threading it through our organisational values and holding our leaders accountable through our objective and goal setting processes, we are ensuring we deliver inclusive colleague and customer experiences and creating a diverse organisation which is reflective of society today.