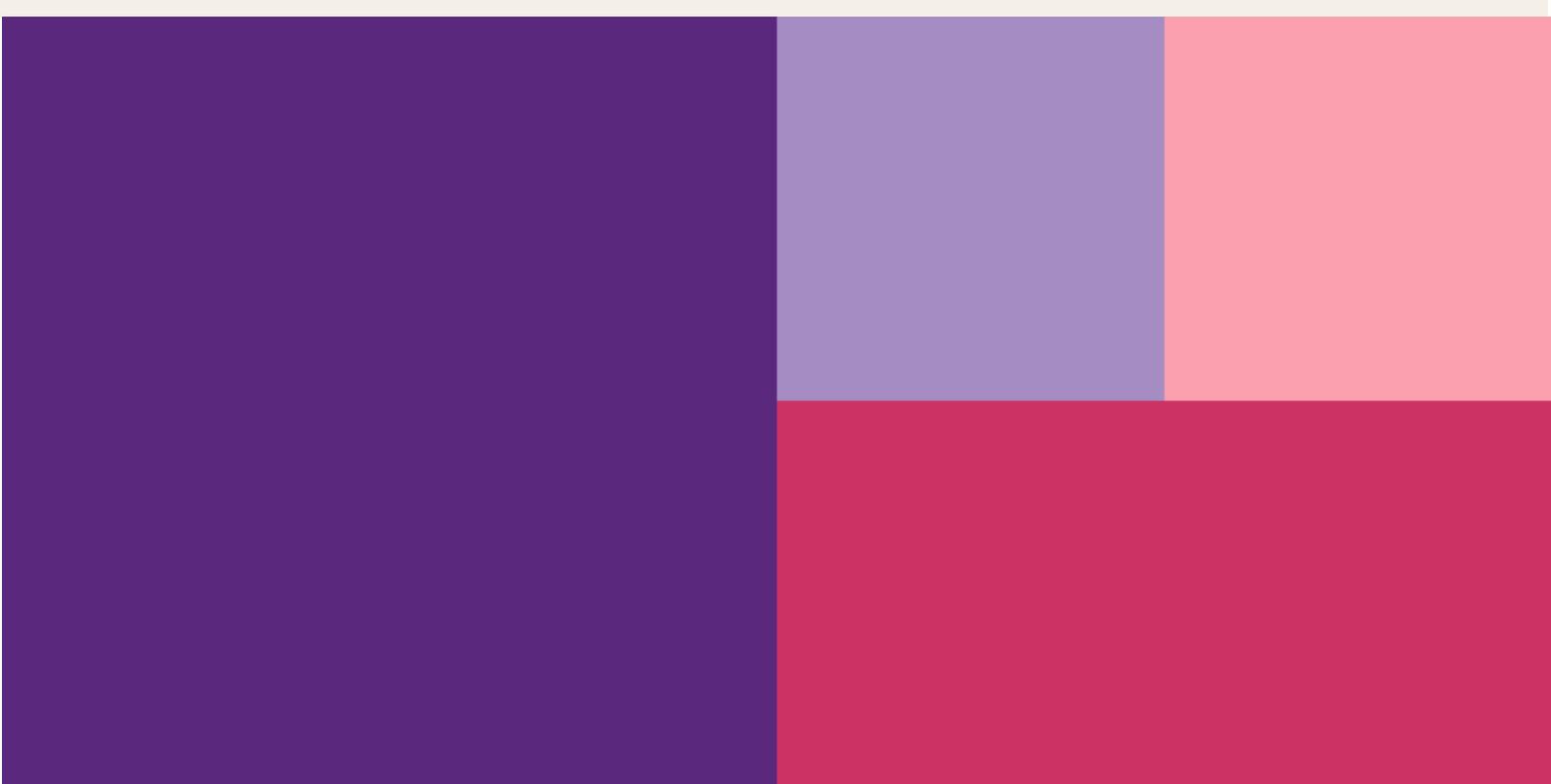


NatWest Group Policy Framework



Speak Up One Minute Policy

February 2021



Overview

How we do it



We all have a responsibility to speak up if something is wrong and will affect the NatWest Group (NatWest), 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. Anyone raising a concern is acting in accordance with a key NatWest 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 can raise your concerns:

- With a colleague, your line manager, or your line manager's manager if you are comfortable to discuss your concerns with them; or
- Confidentially through the dedicated whistleblowing service 'Speak Up'.

Speak Up is a confidential 24/7 telephone and web-based service operated on behalf of NatWest by a third-party supplier.

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. You also have the option to remain anonymous if you would prefer not to disclose your name or contact details. Specific reporting requirements exist for some countries. These are provided at the time of submitting a report online or by telephone.

You can also raise your concerns directly with the [Financial Conduct Authority \(FCA\)](#) and the [Prudential Regulation Authority \(PRA\)](#) in the UK, or your local country regulator. There is no requirement for you to raise your concerns internally before, during or after contacting the regulator.

NatWest treats whistleblowing seriously. We will consider every concern reported. Where appropriate, we will allocate an 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 a genuine concern. 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 legislation.

If you believe you have suffered detriment, victimisation or mistreatment as a result of raising a genuine concern you can have this taken forward via the Resolving Issues at Work Policy by raising a formal grievance. Alternatively, you can contact the Speak Up team directly. You can find more information about the Resolving Issues at Work process on the HR intranet page, available by following this path: **NatWest Group Intranet > Human Resources > Working Here > Resolving Issues at Work.**

For more detailed information on the Speak Up framework, including managing and reporting detrimental treatment, please refer to the Employee and Line Manager Guidance document which is available on both the internal Speak Up intranet page (**NatWest Group Intranet > Policies > Risk and security > Speak Up**) and the external [Speak Up reporting service web page](#).

Alternatively, you can contact the Speak Up team mailbox by emailing:

- Internally: ~ **Speak Up Guidance & Support**
- Externally: speakupguidancesupport@natwest.com

Do I need to know about this policy?

The Speak Up Policy applies to all employees, contractors, temporary staff and secondees (for ease of reference in this policy they are all referred to as 'employees') and those acting on behalf of or representing NatWest. This includes consultants and other service providers. Everyone working for the organisation needs to understand how this policy affects them.

Whilst there is no definitive list of what should be reported, examples include but are not limited to:

- Conduct and behaviour that falls short of Our Code, including sexual harassment or discrimination;
- Criminal activity including authorisation breaches, theft or involvement in the facilitation of slavery;
- Breaches of NatWest policies, procedures or customer treatment standards (such as mis-selling);
- Manipulation of sales and service processes;
- Breaches of regulatory or legal requirements (such as financial services regulators' rules and regulations, data protection law and competition law);
- Breaches of financial accounting and auditing obligations;
- Colleagues dealing inappropriately with their own accounts or the accounts of others;
- Behaviour that harms the reputation or financial well-being of NatWest;
- Other risks or dangers at work (such as breaches of IT security); and
- Any attempt to conceal any of the above points.

Depending on the nature of the concern it may be that there is a more appropriate, existing process in place for some issues to be raised. For example:

- Personal grievances – there are processes in place for addressing colleagues' concerns that relate to issues personal to them, which may be more appropriately managed and supported by HR. These include:
 - o **Resolving Issues at Work Process:** if you have personal issues relating to your employment (e.g. you think you are being bullied) - follow the HR Resolving Issues at Work process;

- o **Performance Rating Appeal:** if you are dissatisfied with your end of year rating - refer to your line manager regarding the Performance Ratings Appeal process; or
- o **Redundancy Appeals Process:** if you are dissatisfied with the redundancy process - follow the HR Redundancy Appeal process.
- o **Disciplinary Process:** which supports line managers to address concerns about a colleague's conduct;
- Customer complaints – refer to your local complaints team; or
- Money Laundering – if you have suspicions that transactions on a customer's account may be linked to money laundering, raise an Internal Money Laundering Suspicion Report (IMLSR).

These processes should be used in the first instance. Where you are unsure whether your concerns would be best addressed through Speak Up or otherwise, please contact the internal Speak Up Team for advice. All contact is treated confidentially.

If you have exhausted the alternative process and have concerns in relation to its effectiveness or efficiency, this can be reported through Speak Up. However, any investigation into such concerns would be focused on the overall process rather than any personal / individual cases.

I must...

- Complete any mandatory reading or training relating to Speak Up.
- Know how to access the Speak Up service.
- Report any known or suspected activities or behaviours within the NatWest Group of which I become aware, or are made known to me, that are not in line with Our Code, breach our internal policies and procedures, or are illegal.

I must not...

- Undertake any investigations of my own unless formally appointed to do so by the Speak Up team, or a member of an investigations team authorised to conduct Speak Up investigations.
- Undertake any activities that lead to detriment, victimisation or mistreatment of any staff member you suspect or know to be a whistleblower.
- Make any attempts to identify a whistleblower.

If I manage a team or I am responsible for change projects I must:

- Create a culture which encourages people to speak up if something is wrong.
- Ensure that my staff are aware of Speak Up (for example through GPL completion).
- Protect any employee who raises an issue or makes a report from any form of retaliation.

Record Keeping

Records in relation to this policy are deemed 'high risk records' and must be maintained in accordance with the Group's Managing Records Policy. They must be retained in line with the Group's records retention schedule.

Business/functions are responsible for retaining and making accessible all records, including all correspondence, for the country-relevant retention period. This is found by inputting the retention code AC1200 into the Group's Record Retention Schedule. In the UK, records must be retained for 7 years.

Non-compliance

Non-compliance with this policy, including any Exception to Policy (EtP), must be managed in accordance with the mandatory procedures set out the Operational Risk Handbook. Both of these documents can be accessed internally by following this path: **NatWest Group Intranet > Policies > NatWest Policy Framework > Managing Non-Compliance**

NatWest treats failure to follow the requirements of this policy very seriously and where applicable in accordance with local policy and laws may discipline those who do not follow the policy. This could result in dismissal if the conduct is considered sufficiently serious to amount to gross misconduct. Where applicable, for example in cases where the conduct is also considered to be a breach of the conduct rules, the bank may report disciplinary action to the regulators.

Who can I contact for assistance?

Speak Up Contact Details

Speak Up Framework Team	eMail	Internal: ~ Speak Up Guidance & Support External:SpeakUpGuidanceSupport@NatWest.com
Head of Speak Up & Whistleblowing Andy Noble	Telephone	+44 7887 822 120
<u>Speak Up Framework Managers</u> Stephanie Black Eleanor Leek Jennifer Jackson	Telephone Telephone Telephone	+44 7824 866 180 +44 7790 364 675 +44 7816 112 142
Speak Up Chatbot Found on the internal Speak Up intranet page	Chatbot	Speak Up Home Page / Chatbot Select option 1
Financial Conduct Authority (FCA)	Web Link	Financial Conduct Authority (FCA)
Prudential Regulation Authority (PRA)	Web Link	Prudential Regulation Authority (PRA)
Protect (An independent whistleblowing charity)	Web Link	Protect

Approval

Approved by: Lesley Richardson, Director Conduct & Compliance. (Policy Sponsor)

Date: 26 Feb 2021

Approved by: Andy Noble, Head of Speak Up & Whistleblowing. (Policy Owner)

Date: 25 Feb 2021