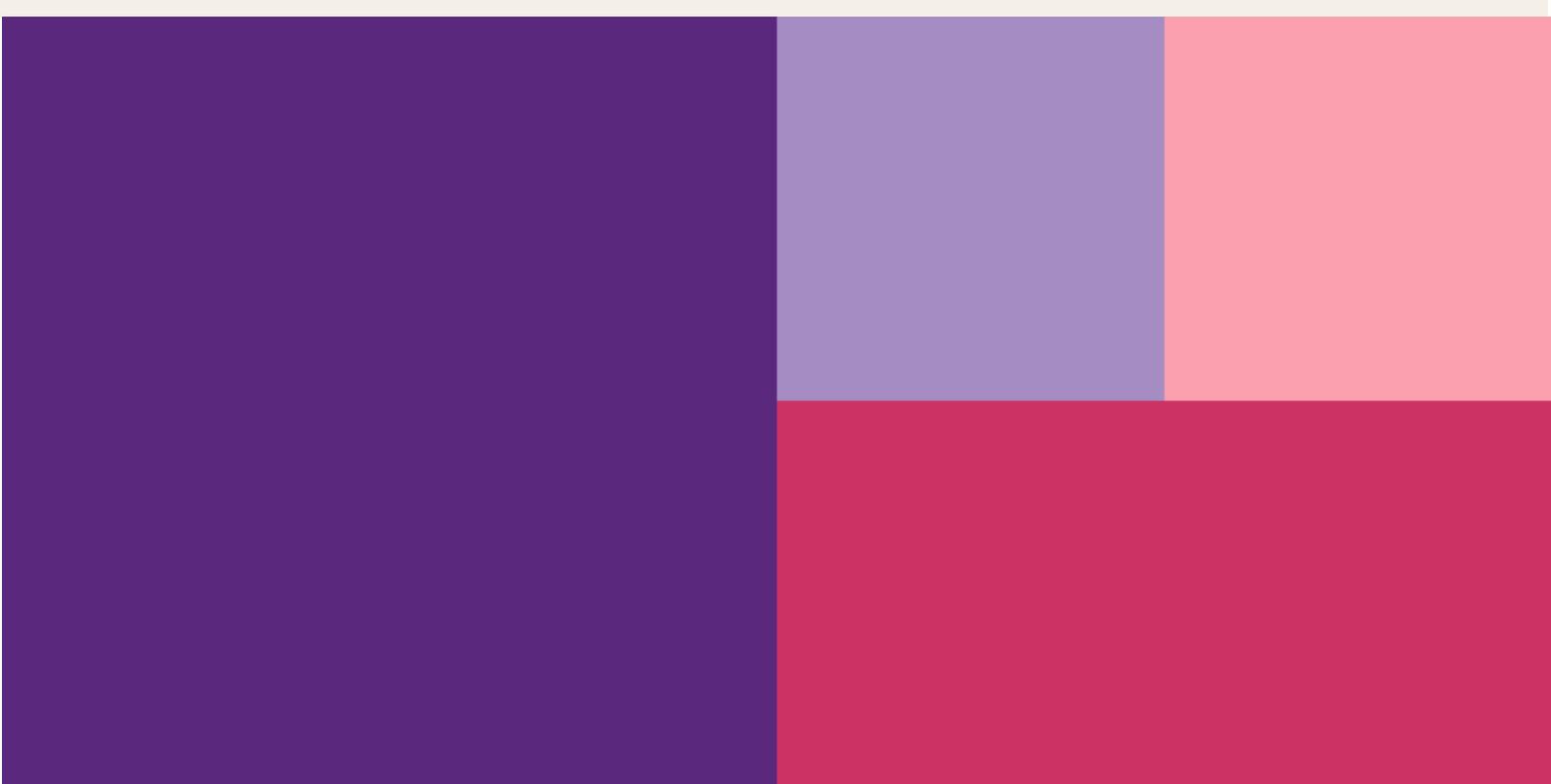


# NatWest Group Policy Framework



## Speak Up Policy

December 2021



# Overview

## How we do it



Everyone working for the organisation needs to understand how this policy affects them. We all have a responsibility to speak up if something is wrong and will affect NatWest, its customers, employees, shareholders, or the public. This includes behaviour which is not in line with our code of conduct (Our Code), breaches our internal policies and procedures, breaches regulatory requirements or is illegal. You do not need to have proof that the activity being reported has been, is being or is likely to be committed. Anyone raising a concern is acting in accordance with a key NatWest value: Doing the Right Thing.

The Speak Up policy is purposely broad, covering anyone who acquires information about wrongdoing through work related activity, during recruitment, or as part of any pre-contractual negotiations. It covers all employees and those acting on behalf of or representing NatWest Group (NatWest) such as contractors, subcontractors, suppliers, temporary staff, secondees, consultants, interns, and volunteers. This also includes any persons formerly in these roles. Throughout the rest of this policy, we will refer to the above individuals as 'reporters' or 'reporting persons'.

You can raise your concerns:

- With a colleague or line management if you are comfortable discussing your concerns with them; or
- Confidentially, and anonymously if preferred, through the dedicated whistleblowing reporting service 'Speak Up'.

Speak Up is a confidential 24/7 telephone and online reporting service operated on behalf of NatWest by a third-party supplier. Reports can also be made directly to the Speak Up team via email or letter. Alternatively, a physical meeting to raise your concerns can be arranged upon request. The most efficient way to raise your concerns is online. Contact details for the Speak Up team can be located below.

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 concerns that relate to colleagues personally. These include:
  - o **Resolving Issues at Work - managed and supported by Human Resources (HR):** if you have personal issues relating to your employment (e.g., you think you are being bullied).
  - o **Performance Rating Appeal - through your Line Manager:** if you are dissatisfied with your end of year performance rating.
  - o **Redundancy Appeals Process - managed and supported by HR:** if you are dissatisfied with the redundancy process.
- Customer complaints – refer to a local complaints team, or visit the 'How to Complain' pages of the NatWest Group website at <https://www.natwestgroup.com/who-we-are/contact-us/how-to-complain.html>
- External Recruitment – contact the NatWest Recruitment Team via <https://jobs.natwestgroup.com/pages/application-support>
- Money Laundering – if you have suspicions that transactions may be linked to money laundering, raise an Internal Money Laundering Suspicion Report (IMLSR). If, however your concerns relate to financial crime policies or process, these may be raised through the Speak Up service.

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 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 or individual matters.

All concerns raised through Speak Up are treated confidentially. Your personal details, or any other information from which your identity could be deduced, will not be shared outside of the Speak Up process without your permission, 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 explained at the time of submitting a report.

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. Feedback will be provided to the reporter where possible, both during an investigation and at the point of closure.

You can also raise your concerns externally with the Financial Conduct Authority and the Prudential Regulation Authority in the UK, or your local country regulator or competent authority. There is no requirement for you to raise your concerns internally before, during or after contacting the regulator.

If you report your concerns, you will be protected should you suffer any form of retaliation - including harassment, victimisation, discrimination, or any other mistreatment. This protection also extends to anyone supporting you in this process, in a work-related context. The mistreatment of anyone as a result of raising a concern will be viewed as a disciplinary matter. This could be a direct or indirect act or omission that may cause detriment to the reporting person. Depending on the nature of the concern being raised you may also be afforded protection under local laws. For example, in the UK reporters may also have additional protection under UK legislation.

If you believe you have suffered any form of retaliation or detriment because of raising a concern you should contact the Speak Up team so that they can provide support and arrange for the matter to be investigated. Contact details are provided below. Alternatively, employees can raise any of these issues through the Resolving Issues at Work Policy by submitting a formal grievance. 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 Speak Up Guidance document which is available on the external Speak Up reporting service pages via <https://natwestgroup.ethicspoint.com/> and the internal Speak Up intranet page (**NatWest Group Intranet > Policies > Risk and security > Speak Up**).

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

- Internally: ~ **Speak Up Guidance & Support**
- Externally: [speakupguidancesupport@natwest.com](mailto:speakupguidancesupport@natwest.com)

## Employees 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 they become aware, or are made known to them, that are not in line with Our Code, breach our internal policies and procedures, breach regulatory requirements, or are illegal.

## Employees must not...

- Undertake any investigations of their 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 the identification of anyone suspected or known to be a whistleblower.
- Subject anyone to detriment, dismissal, or any other mistreatment due to them reporting concerns.
- Speculate on or seek to identify the origins of an investigation.
- Share the identity of a whistleblower without permission.

## 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).
- Recognise and escalate through Speak Up any concerns 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, breach regulatory requirements, or are illegal.
- Protect any person who raises a concern of wrongdoing from any form of retaliation or mistreatment.

## Record Keeping

We take the collection and handling of information seriously and comply with applicable laws, regulations, and guidelines.

All information provided will be kept confidential and will be handled in line with the NatWest Group Employee Privacy Notice unless otherwise stated within the Speak Up reporting process. The notice tells you why NatWest Group collects your personal information, what can be collected and how it's used.

All 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 in accordance with retention code AC1200.

Functions and franchises are responsible for retaining and making accessible all records, including all correspondence, for the country-relevant retention period.

## Purpose

This policy supports the Bank's purpose of championing potential, helping people, families and businesses thrive. The Speak Up service aims to create an environment where colleagues feel safe to speak up and protects those who do from detriment. Speaking up is a vital component of a healthy culture, which in turn, enables everyone to achieve their potential and deliver on Our Purpose. The Speak Up service operates across NatWest, covering all legal entities, functions, and franchises.

## 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. Where applicable, in cases where the conduct is considered to be a breach of the conduct rules, the bank may report disciplinary action to our regulators.

## Who can I contact for assistance?

<b>Speak Up Team</b>	<b>email</b>	<b>~ Speak Up Guidance &amp; Support</b> <b>(<a href="mailto:SpeakUpGuidanceSupport@NatWest.com">SpeakUpGuidanceSupport@NatWest.com</a>)</b>
<b>Head of Speak Up &amp; Whistleblowing</b> Andy Noble	Telephone:	+44 7887 822 120
<b>Speak Up Framework Managers</b> Stephanie Black Eleanor Leek Jennifer Jackson	Telephone: Telephone: Telephone:	+44 7824 866 180 +44 7790 364 675 +44 7816 112 142

You can find other useful information on the Speak Up reporting platform at <https://natwestgroup.ethicspoint.com> This includes how to raise a Speak Up report and a list of designated competent authorities should you wish to raise a report externally.

## Approval

Approved by:

Julian Morgan, Director of Group Non-Financial Risk & Regulatory Compliance (Policy Sponsor)

Date: 07 Dec 2021

Approved by:

Andy Noble, Head of Speak Up & Whistleblowing (Policy Owner)

Date: 02 Dec 2021