

Statement on Anti-Bribery and Corruption (ABC)



NatWest Group has zero tolerance to actions and activities that knowingly breach bribery and corruption regulations, laws, and disregard for the ABC Policy and is firmly committed to acting with integrity, due skill, care, diligence and fairness in all its business dealings and commercial relationships. NatWest Group requires compliance with the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977 as well as locally applicable laws and regulations.

NatWest Group is firmly committed to ensuring that it acts responsibly and ethically, with integrity, fairness, due skill, care and diligence both when pursuing its own business opportunities and when awarding business. NatWest Group ABC Policy and associated Mandatory Procedures apply to all businesses and staff globally and NatWest Group requires compliance with these obligations whenever acting for or on behalf of NatWest Group. The ABC Programme ensures NatWest Group conducts its business fairly and lawfully and states that NatWest Group will not tolerate:

- the giving or receiving of improper (monetary or other) inducements; or
- any other inappropriate practice which might be perceived to improperly influence conduct.

Culture

NatWest Group conducts its business fairly and lawfully and will not tolerate the offering, giving, promising or receiving of improper monetary or other inducements, or any other inappropriate practice which might be perceived to improperly influence a person's conduct in their professional or public duty.

NatWest Group aims to promote transparency with our stakeholders, including our customers, vendors and other third parties with whom we conduct business. NatWest Group takes this opportunity to communicate our expectation that our stakeholders conduct business in a fair and ethical manner and have controls in place to comply with ABC legal and regulatory requirements

NatWest Group strives to maintain and adhere to the highest standards of governance and ethical conduct to protect itself from any bribery, corruption or reputational risks. 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 abide by not only the letter, but also the spirit, of applicable laws and regulation. This is a hallmark of the NatWest Group culture and reflects 'Our Code' which defines our culture of ethical behaviour and pledge to Serve our Customers and Do the Right Thing.

ABC Programme

NatWest Group's ABC Programme addresses key ABC risk areas including:

Staff:

- A Group-wide threshold and pre-approval process for gifts and hospitality in relation to the offering and accepting including the requirement to keep accurate records.
- Requirement that the hiring, for paid or unpaid, temporary or permanent roles, is not used to influence a business decision or to gain an advantage for NatWest Group.
- Prohibition on the provision of facilitation payments.
- Delivery of ABC training appropriate to role and jurisdiction.
- A Speak Up Policy to ensure individuals can confidentially report suspicions of bribery or corruption.
- Senior Management endorsing that NatWest Group operates a policy of zero tolerance to bribery or corruption.

Third Parties:

- Associated Parties are defined by NatWest Group as persons and entities that perform services for or act on behalf of the NatWest Group.
- Conducting the appropriate level of ABC Due Diligence on third parties with whom NatWest Group is engaging including Associated Parties who perform services or act on behalf of the NatWest Group.
- Mandating the requirement for ABC contract clauses in written agreements and the on-going management of Associated Party relationships.

Strategic:

- Regular risk assessments of all NatWest Group businesses to identify and mitigate potential bribery and corruption risks.
- Assessment of bribery and corruption risk where there is a risk of offering an improper advantage or being perceived to do so, including, but not limited to corporate donations, charitable activities and sponsorships, political activities, commercial sponsorships, mergers, acquisitions, joint ventures and other investment / divestment relationships.
- Enhanced due diligence conducted on higher risk activities.
- Prohibition of the payment of political contributions on NatWest Group's behalf.
- Performing monitoring and assurance activity to ensure that our procedures, systems and controls are adequately designed and operating effectively.