



NatWest
Group

AI & Data Ethics Code of Conduct

Keeping our customers and colleagues safe is a priority at NatWest Group. This Artificial Intelligence & Data Ethics Code of Conduct outlines the principles we follow when managing customer data or developing AI technology.

NatWest Group plc

AI & Data Ethics Code of Conduct comprises of two sets of principles

These principles complement each other, providing a 'north star' for responsible AI and Data Ethics at NatWest Group: they are the foundation of our AI Strategy.

Data Ethics ensures security, privacy and transparency in data collection, processing and sharing. AI Ethics extends these principles to ensure AI algorithms that use the data are fair and unbiased, protecting colleagues and customers. Our AI & Data Ethics Code of Conduct aligns with our purpose and values.

Our Data Ethics principles

We work towards ensuring that we:

- 1** Respect people, their aspirations and their privacy
- 2** Help customers make informed decisions
- 3** Work to prevent harm to individuals and benefit society
- 4** Make sure data we use is accessible and the way we use it is fair and prevents discrimination
- 5** Are transparent

Our AI principles

We work towards ensuring our AI systems:

- 1** Are subject to human oversight and promote human agency
- 2** Are technically robust, resilient, and safe to prevent unintentional harm
- 3** Comply with privacy and data protection laws throughout the model lifecycle
- 4** And decisions they make can be explained to customers in a way they will understand
- 5** Are free from bias and discrimination
- 6** Consider the social and environmental impacts
- 7** Provide an opportunity to contest the outcomes of our AI Systems and ways to get redress



This Code of Conduct serves as a statement of our intent, outlining our fundamental principles regarding ethical use of artificial intelligence (AI) and it reflects our aspirations to foster responsible and transparent practices. It is important to note that this Code of Conduct is not a comprehensive overview of every aspect of AI usage within our organisation. As we navigate the complexities of AI, we recognise that our practices will evolve as technology and societal norms and legal and regulatory requirements develop and that adaptation and a holistic approach will be essential in addressing the broader implications and challenges that arise.



Data Ethics Principles

NatWest Group's Data Ethics Principles are embedded in our practices through privacy, security, sustainability, and risk management. These principles clarify ethical decision-making.

Our Data Ethics Principles are:

1

Respect people, their aspirations and their privacy

- We are inclusive and diverse
- We listen to our customers
- We comply with privacy and data protection regulations
- We handle personal and financial data responsibly to keep customer data safe and secure

For example, we have a Privacy and Client Confidentiality Policy which is used to implement robust risk controls and data management practices, supported by mandatory training for colleagues.

We also engage with suppliers to understand their privacy governance.

Find out more at [Protecting privacy and customer confidentiality | NatWest Group](#)

2

Help customers make informed decisions

Data helps build a picture to support our customers make informed decisions, leading to good outcomes. We embed Consumer Duty principles in our operations and have a Good Customer Outcomes Centre of Excellence.

Find out more at [NatWest and Consumer Duty | NatWest Group](#)

3

Work to prevent harm to individuals and benefit society

Holding customer data can create benefits and opportunities but also risks. We have implemented a new Data Management process across the Group, additional data-focused learning, and we publish research to benefit society.

Find out more at [AI & Data | NatWest Group](#)

4

Make sure the data we use is accessible and the way we use it is fair and prevents discrimination

Data can include sensitive information, misuse of which can introduce harm and unfair bias. NatWest Group doesn't tolerate discrimination.

"**Our Code**" ensures we do this without exception:

"[We] won't tolerate discrimination related to sex, race, age, religion, origin, disabilities, marital status, sexual orientation, or social condition, and encourage colleagues to speak up if they don't see our purpose in action."

5

Be transparent

We tell customers why we hold their data and what we use it for, as detailed in [Our privacy policy | NatWest |](#)

Our colleagues are able to raise questions about data use to an [AI & Data Ethics panel](#) for guidance.

Our AI Ethics Principles

Our AI Principles underpin the way we design and build AI systems, ensuring we adopt an ethical mindset through all stages of AI system's development.

Artificial Intelligence has the potential to change the world for the better, but it needs to be used responsibly. We've been using AI at NatWest for several years, for example, it helps us identify financial crime and detect fraud and it helps us and our customers understand how they're spending, so we can help them budget and save money.

The principles we work with are that AI systems:

1 Are subject to human oversight and promote human agency

We always involve people in our processes, and our colleagues have the ability to review, override or intervene in AI-powered processes if necessary.

Our AI systems help colleagues and customers using them to take informed and autonomous decisions.

AI systems are designed to remove manipulation, deception or any other negative features.

2 Are technically robust, resilient, and safe to prevent unintentional harm

AI systems must be reliable, stable, secure, and resilient to attacks. We have risk management systems and contingency plans to ensure AI systems perform reliably and as intended.

3 Comply with privacy and data protection laws throughout the model lifecycle

The use of data in our AI systems is subject to a wide-range of controls, such as data governance, management, quality and suitability assurance practices.

We conduct Privacy Impact Assessments for all AI Systems to ensure compliance with data privacy regulations.

Robust mechanisms are in place to address threats like data leakage.

4 And decisions they make can be explained to customers in a way they will understand

Decisions made by AI systems can have major implications for customers. For example, if an AI system declines a customer's product application, we can explain the reasons.

5 Are free from bias and discrimination

AI systems recognise patterns in data, but sometimes these patterns cause bias, leading to unfair decisions. We thoroughly test our AI systems for performance, fairness, and bias to help avoid discrimination, and only then do we deploy AI.

6 Consider the social and environmental impacts of AI systems

We consider the environmental impact of AI systems and therefore deploy them with sustainability in mind. Whenever we deploy AI systems in the bank, we aim to do it in a way that augments and complements the work our colleagues perform.

7 Provide an opportunity to contest the outcomes and ways to get redress

We give our customers ways in which they can understand how our AI systems come to decisions and how they can question these if need be.

How it works

We adhere to AI System Principles through:

- ✓ An **Ethical Model Process** used across the bank that evaluates AI systems during their design and development, to ensure unintended outcomes are avoided.
- ✓ A dedicated **AI & Data Ethics team** supported by a panel of colleagues.
- ✓ **AI and Data Ethics training** is offered to all colleagues and with a number going on to become AI & Data Ethics panel members.

Want to know more?

Find out more about NatWest Group's approach to responsible AI and Data Ethics at [AI & Data | NatWest Group](#)

NatWest Group plc

AI & Data Ethics Code of Conduct

The AI and Data Code of Ethics Code of Conduct (Code of Conduct) has been prepared by NatWest Group plc (together with its subsidiaries the 'NatWest Group') and it is intended solely for information purposes and it is not a legally binding document. While it serves as a guide for responsible and ethical practices, this Code of Conduct is aspirational and high level in nature and are not enforceable by law. Users are encouraged to consider this Code of Conduct as a guidance rather than a strict set of requirements.



NatWest
Group