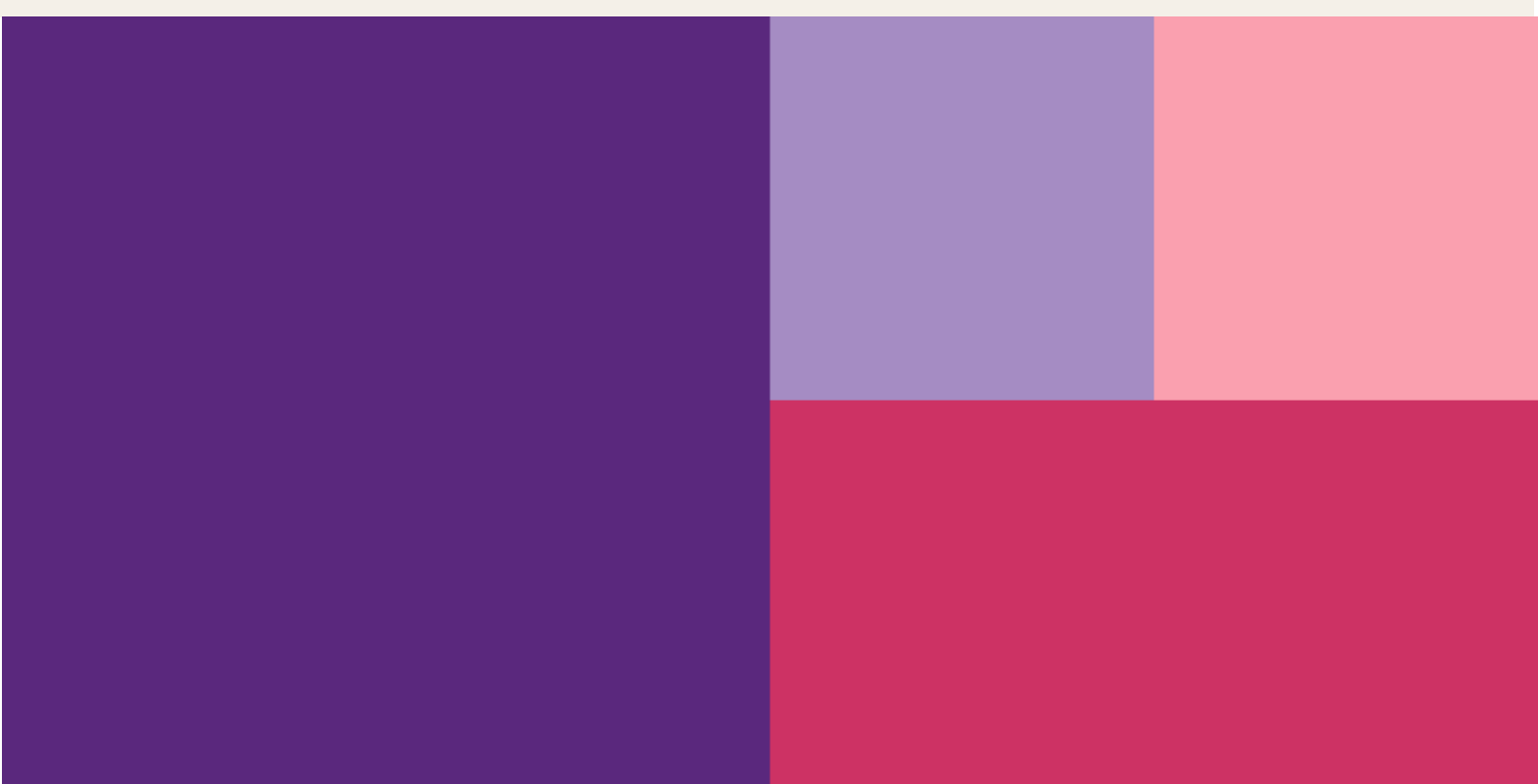


# NatWest Group Policy Framework



## Speak Up Policy

July 2024



# Overview

## How we do it



### Purpose

Speaking up is valued at NatWest Group. It is a vital component of a healthy culture and key to being a Purpose-led organisation. We want everyone to feel confident to raise any concerns they have about wrongdoing or misconduct in the course of their work without fear of retaliation. Anyone raising a concern is acting in accordance with NatWest Group values.

### Who does the Speak Up policy apply to?

The Speak Up policy applies across NatWest Group, covering all legal entities, functions, and franchises. 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 Group, its customers, employees, shareholders, or the public. This includes behaviour that is not in line with our code of conduct (Our Code), breaches our internal policies and procedures, breaches regulatory requirements or is illegal. Proof that the activity being reported has been, is being or is likely to be committed is not required.

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 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'.

### How can I raise concerns?

You can raise your concerns: -

- **Openly**, meaning you are not worried about being identified, with a colleague or line manager if you are comfortable discussing your concerns with them; or
- Through the dedicated whistleblowing reporting service 'Speak Up' either: -
  - **Confidentially**, meaning 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; or
  - **Anonymously**, meaning you choose not to provide any identifying information within your report, including your name.

Speak Up is a confidential 24/7 telephone and online reporting service operated on behalf of NatWest Group by a third-party supplier. It will be one of their employees that you will speak to if you raise a concern by phone. Reports can also be made directly to the NatWest Group Speak Up team, via email or letter. Alternatively, a physical meeting 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. You can also access the 'Speak Up guidance for reporters' document, which provides further information on raising concerns through Speak Up, by visiting the following web link: - <https://natwestgroup.ethicspoint.com> and selecting the 'about' section.

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. You can find a list of designated competent authorities on the Speak Up reporting platform under the 'about' section at <https://natwestgroup.ethicspoint.com>

## **What types of concerns should be reported through 'Speak Up'?**

While there is no definitive list of what should be reported, examples of what types of concerns can be reported include, but are not limited to:

- Conduct and behaviour that falls short of Our Code, including sexual harassment or any form of discrimination related to race (including colour, nationality, or ethnic origin), age, sex, gender, disability, pregnancy, religion or belief, marital status, sexual orientation, or social condition;
- Criminal activity including fraud, theft, or involvement in the facilitation of slavery;
- Breaches of NatWest Group policies, procedures, or customer treatment standards (such as mis selling);
- Breaches of regulatory or legal requirements (such as financial services 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 wellbeing of NatWest Group;
- Other risks or dangers at work (such as breaches of IT security or health & safety requirements);
- Breaches of this policy or the Speak Up process, including whistleblower detriment; and
- Any attempt to conceal any of the above points.

## What types of concerns should not be reported through ‘Speak Up’?

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 you 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 **Post Employment Complaint – managed and supported by HR:** if you have personal issues relating to your previous employment with NatWest Group, these should be raised through your former Line Manager in the first instance (or your former line manager’s line manager), who can then record a case with HR. Alternatively, if you wish you can raise them via this mailbox: [HROnline@natwest.com](mailto:HROnline@natwest.com)
  - o **Performance Assessment Appeal - through your Line Manager:** if you are dissatisfied with your end of year performance assessment.
  - 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 Group 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. Alternatively, if you feel comfortable in doing so, you could discuss how best to manage your concerns with your line manager or a manager you trust. You can also AskArchie for further support.

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.

## What do I do if someone raises a concern directly to me?

If a report is raised directly to you, then as the recipient of that report you must: -

- keep confidential any information that may reveal the identity of the whistleblower, or any other person(s) named in the report; and
- send the report in its original form, (for example letter or eMail) without delay to the Speak Up Team, contact details are below.

## Is Speak Up confidential?

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. If provided, your name and contact details will only be known by those involved in managing and investigating your concerns and will remain confidential. Reporting confidentially helps make the investigation process more efficient as it enables investigators to gather further information if needed and engage with you directly via your preferred method of contact. Unless required by law, your identity, or any other information from which your identity could be deduced, will only be disclosed to others (for example, the subject of your concerns and/or your line manager) with your consent.

You also have the option to remain anonymous if you would prefer, meaning you do not need to provide any identifying information, including your name. Specific reporting requirements exist for some countries. These are explained at the time of submitting a report.

## What happens after I raise a speak up concern?

NatWest Group treats whistleblowing seriously. We consider every concern reported. Where appropriate, we will allocate one of the Bank's investigation teams 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. If you have concerns about how your concern was handled you can contact the Speak Up team, details below.

## How am I protected?

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 or submitting a knowingly false report 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 in the first instance so that they can provide support and arrange for the matter to be investigated. Contact details are provided below. You have a choice about how your treatment should be investigated, either via the Speak Up process, or through the HR Resolving Issues at Work Policy (or local equivalent) 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**. NatWest Group does not provide protection where allegations have been made maliciously and they are known to be untrue.

# Your responsibilities

## Employees, and those working on behalf of NatWest, 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; and
- Comply with the bank's code of conduct, Our Code, when engaging with the Speak Up process, whatever your role.

## Employees, and those working on behalf of NatWest, 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; and
- 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 that encourages people to speak up if something is wrong;
- Ensure that my staff are aware of Speak Up (for example through e-learning completion);
- Recognise and escalate through Speak Up any concerns of which I become aware, or are made known to me, which are not in line with Our Code, breach our internal policies and procedures, breach regulatory requirements, or are illegal; and
- 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.

## Non-compliance

NatWest Group 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 a breach of the conduct rules, the bank may report disciplinary action to our regulators.

## Further information

NatWest Group is committed to the continual improvement of its whistleblowing management system, and arrangements. 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 pages via <https://natwestgroup.ethicspoint.com/>; or the internal Speak Up intranet page (**NatWest Group Intranet > Useful Sites > Policies > Risk & 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)

## Who can I contact for assistance?

<b>Speak Up Team Mailbox</b>	eMail	~ Speak Up Guidance & Support ( <a href="mailto:SpeakUpGuidanceSupport@NatWest.com">SpeakUpGuidanceSupport@NatWest.com</a> )
<b>Speak Up Team Mailing Address</b>	Post	Speak Up Team 250 Bishopsgate, London, UK, EC2M 4AA
<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 Darren O’Gorman Cheney Perry	Telephone: Telephone: Telephone: Telephone:	+44 7824 866 180 +44 7790 364 675 +44 7824 800 881 +44 7876 463 247

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.

You can seek free legal advice and guidance from Protect, the UK’s largest Whistleblowing charity <https://protect-advice.org.uk/> and for Non-UK jurisdictions from the Whistleblowing International Network <https://whistleblowingnetwork.org/Home>

## Approval

### Approved by:

Andy Noble

Head of Speak Up & Whistleblowing (Policy Owner).

Date: 22<sup>nd</sup> July 2024