Succeeding with customers

NatWest Group

NatWest Group plc Human Rights Report
June 2025

Inside this report

Scope

This report brings together our Human Rights Position Statement (last updated December 2022) and our Salient Human Rights Issues disclosure (published December 2023) and has three objectives across the period 1 January 2024 through to 10 June 2025:

- To provide an overview of our approach to human rights, demonstrating how we uphold and respect human rights across our policies, procedures and governance.
- To report on our management of our identified salient human rights issues across our roles as an employer, a procurer, a retail banker, a commercial banker and an investor.
- To track our journey against the UN Guiding Principles Reporting Framework. We signpost where our reporting seeks to address these principles and acknowledge gaps where we have more to do.

This report should be read in conjunction with the cautionary notes presented at the end of this report.

Our approach to human rights

NatWest Group[1] is a UK-focused banking organisation serving over 19 million customers. We have an important role in promoting respect for human rights and a strong desire to maximise any positive outcomes and to mitigate, where possible, any potential negative impacts that NatWest Group's activities may have on society.

Our approach to respecting human rights is informed and guided by:

- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The International Labour Conventions
- The United Nations Guiding Principles (UNGPs) on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises
- The UN Declaration on the Rights of Indigenous Peoples

We are signatories of:

- The UN Global Compact (UNGC)
- The UN Environment Programme Finance Initiative (UNEP FI)
- The UN Principles for Responsible Banking
- The UN Principles for Responsible Investment
- The Equator Principles

Our approach and progress are made transparent through:

- Our Modern Slavery and Human Trafficking Annual Statement (prepared in line with the UK Modern Slavery Act 2015)
- Our annual reporting suite (including the NatWest Group Annual Report and Accounts and Sustainability Report)
- Performance in benchmarks and indices
- Our policies and processes
- Our ESE Risk Framework

Potentially impacted rightsholders[2]

We recognise that a range of individuals and groups have the potential to be impacted rightsholders:

- NatWest Group customers
- NatWest Group colleagues and contract workers
- Colleagues and contract workers of companies that contribute to NatWest Group operations, products or services through our value chain
- Local communities

Additional potentially vulnerable groups include:

- Women
- Children
- Migrant workers
- Indigenous people

(1) 'NatWest Group' refers to the company and its subsidiary and associated undertakings.
(2) This is not an exhaustive list and we recognise that other groups may be impacted.

Our approach to human rights continued

Salient human rights issues

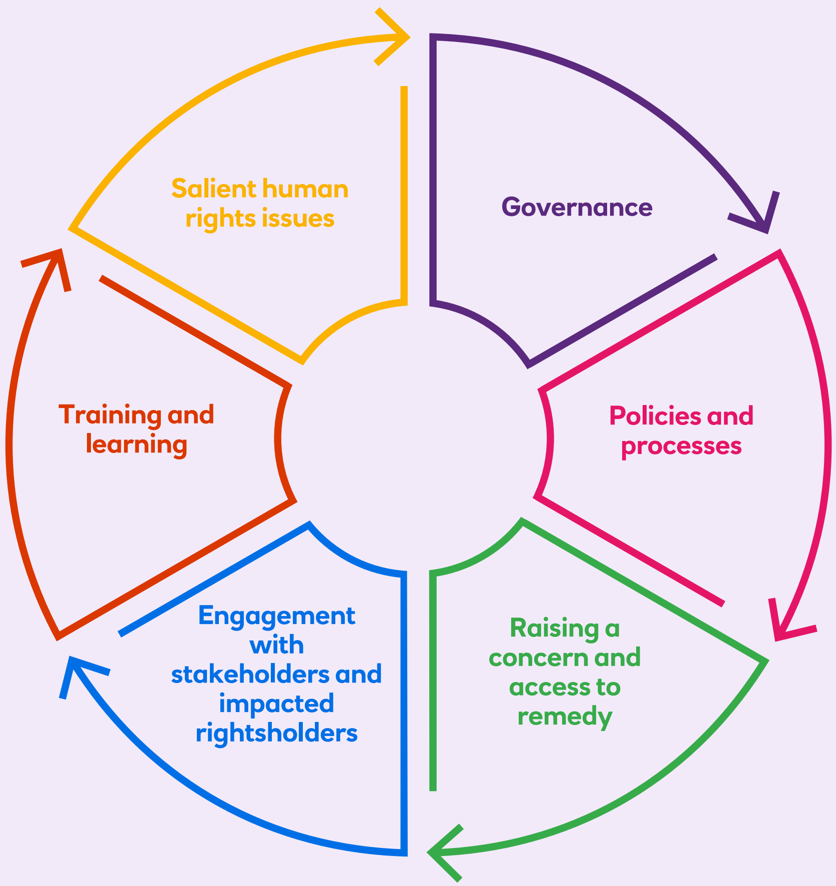
In December 2023 we published our initial salient human rights issues. These are centred on five roles: employer, procurer, retail banker, commercial banker and investor.

Training and learning

Colleagues are expected to undertake regular mandatory training which helps them develop capabilities with resources available that are either directly or indirectly related to human rights.

Engagement with stakeholders and impacted rightsholders

Engagement with stakeholders serves to deepen our understanding and approach to human rights, and we continue to seek different ways of engaging with stakeholders and potentially impacted rightsholders.



Governance

NatWest Group Board provides oversight of human rights issues. Our Human Rights Action Group (HRAG) has representation from across the group with role leads and accountable executives prioritising day-to-day activities.

Policies and processes

We have several policies, processes and frameworks in place that set out our expectations and aid us in addressing human rights.

Raising a concern and access to remedy

We have a number of channels available for stakeholder groups that enable concerns to be raised with remedial action considered on a case-by-case basis.

Governance

Our approach to human rights is subject to NatWest Group Board oversight. Our progress on salient human rights issues, modern slavery, and the emerging regulatory environment was discussed at Board level twice in 2024, once in the first half of 2025, with a further progress update scheduled towards the end of the year.

The below illustrates the formal governance and management-related working groups for human rights

NatWest Group Board

NatWest Group Board is collectively responsible for promoting the long-term success of the company, driving shareholder value and NatWest Group's contribution to wider society. It establishes NatWest Group's strategy and leads the development of its culture, providing leadership of the company within a framework of prudent and effective controls which enables risk to be assessed and managed.

NatWest Group Executive Committee

The NatWest Group Chief Executive delegates responsibility for the management of human rights issues to the respective members of the Executive team.

Human Rights Action Group

The Human Rights Action Group (HRAG) co-ordinates our activities, and makes recommendations to the NatWest Group Executive Committee and Board to develop and strengthen our approach.

Representation from:

- Human Resources
- Third Party Risk Management
- Retail Banking
- Commercial & Institutional Banking
- Investment, Products and Solutions
- Sustainable Banking
- Legal, Governance and Regulatory Affairs
- Risk

Modern Slavery Working Group

Our modern slavery working group develops and embeds our goals to tackle modern slavery through relevant policies and practices.

Representation from:

- Sustainable Banking (Chair)
- Supply Chain
- Third Party Risk Management
- Customer Franchises
- Human Resources
- Legal
- Risk
- Compliance and Conduct

The Sustainable Banking Team is responsible for co-ordinating our human rights activity throughout NatWest Group but the daily work of doing business with respect for human rights is the responsibility of hundreds of employees across the organisation, from relationship managers and supply chain managers to risk colleagues. With regard to our salient human rights issues, each of our five role areas has an accountable executive responsible for overseeing human rights work.

Policies and processes

We have a number of policies, processes, frameworks and assessments in place to help us manage human rights-related issues.(1)

Our colleagues

- Our Code
- Our Behaviours
- Our YES Check
- Our Fair Pay Charter
- Resolving Issues at Work policy
- Anti-bullying, Harassment and Discrimination policy
- Pre-employment Screening (PES)

Our suppliers

- Supplier Code of Best Practice
- EcoVadis assessment (for in-scope suppliers)
- Third-Party Inherent Risk Questionnaire
- Location risk assessment
- Transfer impact assessment
- Pre-employment Screening (PES)

Our customers

- Complaints Management policy
- Environmental, Social and Ethical Risk Framework
- Customer Vulnerability Bankwide Framework and Standards
- Regulatory Compliance Operational policy
- Banking My Way
- Subject Access Requests

NatWest Group supporting policies

- Privacy and Client Confidentiality policy
- Speak Up policy
- Financial Crime policy

(1) This list is illustrative, refer to individual role chapters for more examples and details of policies, processes and mitigations in place.

Raising a concern

We aim to follow high standards of business conduct, helping us to stay compliant with legal and regulatory requirements, and meet the behavioural expectations of our customers and stakeholders. Where we fail to meet the high standards we set ourselves, we have a range of channels through which our colleagues, customers, external stakeholders and suppliers can provide feedback or raise concerns, including concerns around human rights. We continue to monitor best practice on grievance mechanisms and access to remedy, with consideration of effectiveness for potentially impacted rightsholders and as described in the UNGPs latest guidance.

Our colleagues

Speaking up is valued at NatWest Group and is a vital part of our culture. We want every single employee to feel confident to raise any concerns they have about wrongdoing or misconduct. This applies to all employees and those acting on behalf of or representing NatWest, such as contractors, subcontractors, suppliers, temporary employees, secondees, consultants, interns and volunteers. It also applies to any persons formerly in these roles. We have multiple processes in place to facilitate this. Employees are encouraged to raise concerns through:

- Line management
- Human Resources (HR) function (known as our People function)
- Our complaints processes
- Speak Up service

Employees are encouraged to raise concerns through their line management in the first instance. Where managers can address concerns, these are resolved locally, often with support from advisers in our People function. Where employees are uncomfortable raising concerns through line management, or line management are not able to resolve it locally, they can raise an issue through the Resolving Issues at Work process, or through the Speak Up service, as appropriate.

Our suppliers

Our whistleblowing service, Speak Up, is available to all our suppliers, enabling them to report and raise concerns with NatWest Group about any unethical conduct affecting NatWest Group and its stakeholders, including any concerns around human rights. Speak Up is brought to suppliers' attention through our Supplier Code of Best Practice.

Our customers

A concern or expression of dissatisfaction with any element of a product or service can be reported online, on the phone, in writing or in person at one of our branches. NatWest Group has a complaints management policy and detailed procedures for complaint handlers to follow in managing and addressing complaints. Where a complaint alleges employee misconduct, wrongdoing, or any potential infringement of human rights, it is referred to one of the specialist NatWest Group Investigations teams and assessed and investigated as appropriate. If an individual would like to raise a concern on how any part of the Group has managed their personal information, this can be raised via Customer Complaints or directly with our Data Protection Officer, who will ensure the matter is fully investigated.

Our communities

Any individual or community group, including charities and NGOs, can make contact with NatWest Group to raise concerns about human rights and potentially impacted rightsholders. The Sustainable Banking team is the primary contact for engagement on these issues and welcomes feedback and input on our approach. They work across the business to investigate and escalate concerns, working closely with the Risk function. Other channels, such as our Executive Complaints or Speak Up service, can also be used by individuals or groups to raise concerns. External channels include the Equator Principles grievance mechanism, UK OECD National Contact Point, or the UK's Financial Ombudsman service.

For further information refer to How to complain, Whistleblowing and Equator principles at natwestgroup.com.

Engagement with stakeholders and potentially affected rightsholders

We engage with stakeholders every day in the normal course of our business – whether that's serving customers, interacting with suppliers, or gathering feedback from investors. Below are some examples of engagement undertaken, during the reporting period covered by this report, with stakeholders and rightsholders on human rights-related issues.

Our colleagues

We use a variety of listening and reporting tools to promote the colleague voice in the boardroom.

These tools include the Our View colleague engagement survey and the Colleague Advisory Panel (CAP), which is our direct communication channel between the Board and colleagues. The CAP met with representatives from the Board twice in 2024, in May and November. Panel members and directors discussed and shared views on executive remuneration and the wider workforce, performance management, the evolution of the bank's purpose and responsible embedding of artificial intelligence.

Our suppliers

During 2024, NatWest Group hosted a webinar for our suppliers who contribute the most (~70%) to our supply chain emissions to provide information on/inform them of the importance of disclosing their emissions through the Carbon Disclosure Project (CDP). We also worked with anti-slavery charity Unseen to provide bespoke modern slavery training for our SMEs and small suppliers in the UK and India.

For further information refer to Stakeholder engagement at NatWest Group.

Our customers

Our Inclusive Design Panel is an internal monthly forum that brings the voices of people with lived experience into the organisation, combined with feedback from key charities, to support teams in developing products and propositions. This panel was updated for 2025 and includes some new charities, including the African Rainbow Charity and the Asian Peoples Disability Allowance, to bring an additional focus from diverse and new perspectives.

Our communities

To deepen our knowledge of human rights issues we work collaboratively with others and regularly participate and engage with the following:

- The Unseen Business Hub Community and Modern Slavery Working Group
- The 2024 and 2025 UN Global Compact Network UK's Business and Human Rights Accelerator, Modern Slavery and Nature Working Groups
- The UNEP FI's Principles for Responsible Banking Community of Practice for Human Rights
- Scottish International Development Alliance (SIDA) which, via a new membership, has enabled us to access a panel of expert and indigenous voices on a range of human rights issues

Our investors

The CCLA Modern Slavery UK Benchmark[1] was launched in November 2023 to assess and rank companies based on their modern slavery disclosures. As part of the benchmark process we engaged with CCLA to discuss our approach and aims for further improvement. NatWest Group achieved a 'Tier 2' position of evolving good practice to the CCLA Modern Slavery benchmark in 2023 and retained this position for 2024. While there is room for further improvement, we were recognised, by CCLA, for providing evidence of due diligence practices in modern slavery matters, informed by experts and civil society partners.

(1) CCLA Modern Slavery UK Benchmark can be found here.

CASE STUDY

Succeeding with customers by accessing rightholders' voices

Bringing lived experience to the heart of human rights

We recognise the need to consult with communities affected by our business practices and, where possible, to hear their voices and perspectives directly.

In 2024-2025 we ran three panel engagement sessions to help us gain different perspectives from people with lived experience of some of our salient human rights issues.

We discussed NatWest Group's salient human rights issues with a range of charity experts and connected virtually with people living in developing countries to understand how our salient issues resonated with them. The global impacts of climate change, land rights and labour conditions were explored. Charity experts in attendance welcomed the opportunity to advocate for rightsholders and encouraged consideration of the intersectionality of issues.

Our second session explored deforestation and nature and how these issues impact human rights. We focused this session on immersive listening as people impacted by these issues across the globe shared their stories and experiences with us. We were able to share our risk acceptance criteria and approach to Deforestation Risk Commodities with the panel, gathering valuable insights on the benefits and challenges of certification schemes in their communities.

Our third session was about creating a safe space to better understand the realities of child labour. People living in developing countries shared their experiences and views on challenging questions such as what is acceptable and/or harmful in their communities.

Training and learning

Colleagues across NatWest Group are required to undertake training on the following topics, which are either directly or indirectly related to human rights:

Speak Up	All colleagues across NatWest Group complete annual training on Speak Up to ensure they are aware of the service and how to raise concerns. The training covers examples of the types of concerns that can be raised. These include but are not limited to: 1. conduct and behaviour that fall 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; 2. criminal activity including fraud, theft or involvement in the facilitation of human slavery; 3. breaches of regulatory or legal requirements (such as financial services regulators' rules and regulations, data protection law and competition law); 4. breaches of NatWest Group policies, procedures or customer treatment standards (such as mis-selling); and 5. other risks or dangers at work (such as breaches of IT security/health and safety). Specialist training is also completed annually by colleagues in our Investigations, People and Internal Audit teams who are involved in addressing concerns raised by colleagues.
Health and safety	All employees are required to complete mandatory online health and safety training, which covers the key risks for all employees, including fire safety, display screen equipment, manual handling, and slips, trips and falls. It includes specific content for people and building managers of their H&S responsibilities. The building manager section covers workplace management responsibilities and includes learning about asbestos, façades, fire emergency plans, risk assessments, emergency roles and escape route checks. We also have job-specific training for specialist roles; for example, where driving is required on business we have an occupational road risk programme.
Privacy and client confidentiality	All colleagues across NatWest Group are required to complete training on privacy and client confidentiality. Privacy examines the importance of processing personal data lawfully and the rights of individuals in relation to their personal data. Training on client confidentiality provides guidance regarding NatWest Group's obligations under client confidentiality/banking secrecy laws. Further bespoke training is provided as necessary for specific colleagues based on their job roles.
Diversity, equity and inclusion	All colleagues are required to complete diversity, equity and inclusion learning with videos focusing on colleagues' 'lived experience'. Video participants share barriers they have encountered and how they champion inclusive behaviours, helping to raise awareness and build understanding of difference.
Our Code	All colleagues are required to complete training on the purpose of Our Code, the Yes Check and how these apply to colleagues, and where to go for support. The training refers to Speak Up and scenario-based content to ensure the learner understands their role in applying Our Code in day-to-day working life.
Financial crime	All colleagues are required to complete financial crime learning which focuses on financial crime and fraud, sanctions, Anti-money laundering, and Anti-bribery and corruption.
Customers in Vulnerable Situations	All customer facing colleagues have received training in the 4Rs, namely: Recognise, Respond, Record, and Refer. We ensure all colleagues of the bank undertake annual training on customer vulnerability so that they can understand the role they play in supporting customers.

In addition to mandatory training, colleagues are offered a wide range of learning, which can be role-specific or for personal development, on topics related to human rights such as modern slavery and human trafficking.

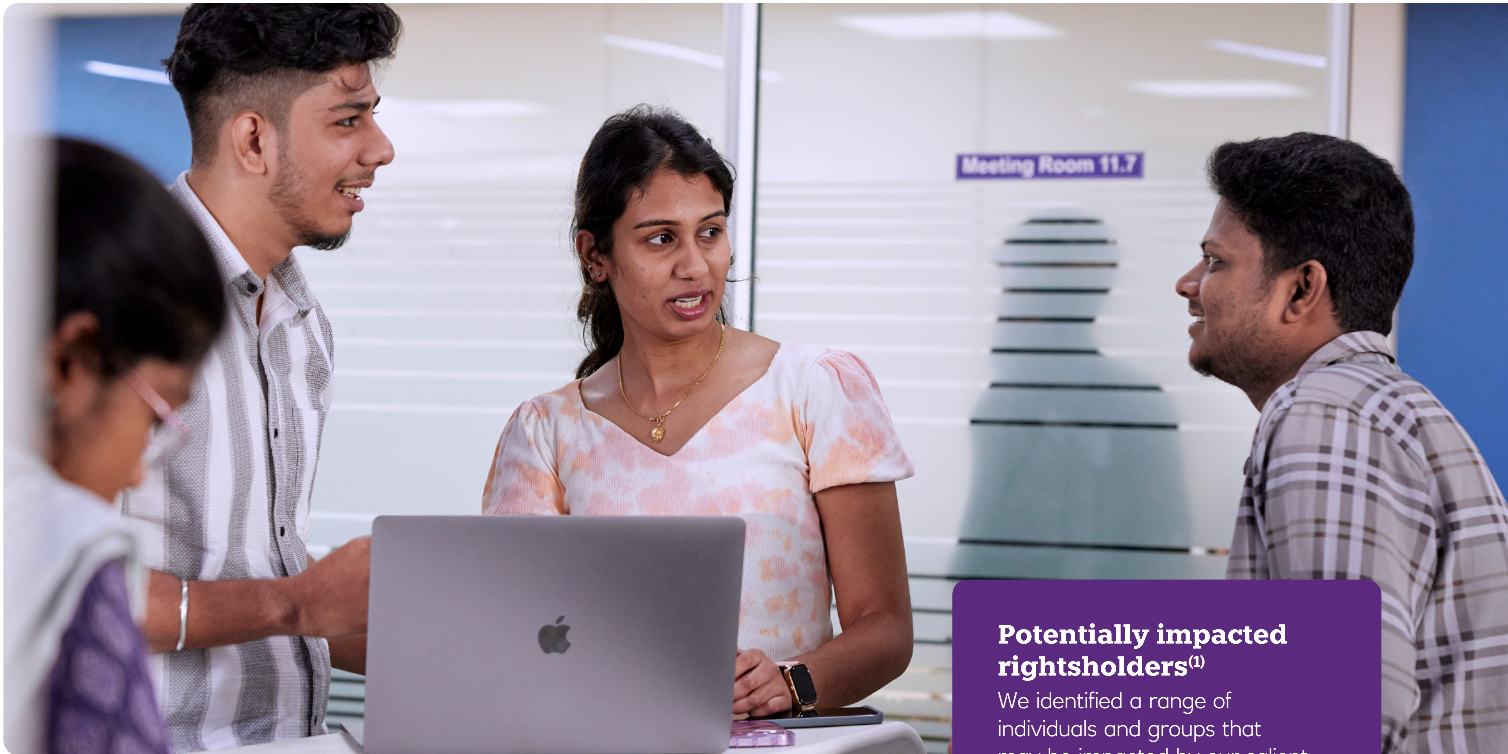
Resources to help integrate and embed our approach

During the reporting period covered by this report we created a bespoke Modern Slavery and Human Rights intranet hub which aimed to further colleagues' knowledge and learning and signpost to relevant resources and learning material.

We held bank-wide activities to mark Anti-Slavery Day (18 October 2024) to provide information on modern slavery and how colleagues can report any concerns. We ran a week-long campaign which included a series of events with modern slavery charities, law enforcement, and colleagues from Financial Crime teams.

'Preventing Modern Slavery and Human Trafficking in the Financial Service Sector' is an online learning module available to all colleagues. A tailored version of this is also mandatory for colleagues in our Supply Chain and Third Party Risk Management business areas.

Our salient human rights issues overview



In 2023 we identified six salient human rights issues which have the most potential to occur if action is not taken to prevent or address them.

These are framed around five roles: employer, procurer, retail banker, commercial banker and investor.

The UN Guiding Principles Reporting Framework defines salient human rights issues as those rights that are at risk of the most severe negative impact through a company's activities or business relationships.

Methodology

To start the process of identifying our salient human rights issues, we worked with a specialist human rights consulting firm to undertake an analysis from the perspective of potentially impacted rightsholders of how our policies, processes and governance perform against the UNGPs on Business and Human Rights. We then engaged a wide range of employees from each of the five roles above to conduct a broad and high-level scoping exercise to identify our salient human rights issues. The outcome of this initial assessment intended to help us prioritise these salient human rights issues for an iterative and more in-depth assessment, including evaluation of our processes and policies. Consideration was given to who might be impacted, the scale and seriousness of the impact, the scope, remediability and likelihood of a recurrence.

Stakeholder engagement

In line with the UNGPs on Business and Human Rights, we engaged internal and external stakeholders to inform our understanding of our salient human rights issues, explain our conclusions and check whether any considerations had been missed. We spoke with investors, charities, colleague representative groups, a supplier and representatives of UK businesses. Stakeholders were in support of our assessment with additional considerations offered.

For human rights issues not identified as salient for a role, we discussed the inherent risks to human rights that remain, especially with regards to climate change and the potential impacts UK homeowners in our mortgage book may face. We have made addressing the climate challenge and supporting our customers in their transition to net zero a strategic priority.

Therefore, while climate change was not identified as a salient human rights issue for all roles, it is an issue we are closely monitoring. Stakeholders representing UK businesses pointed out that the list of salient human rights covered many issues and prioritisation would be important, as would working collaboratively with customers to make progress in recognising the pressures that businesses, and small businesses in particular, are under.

Potentially impacted rightsholders[1]

We identified a range of individuals and groups that may be impacted by our salient human rights issues, including:

- NatWest Group customers
- NatWest Group colleagues and contract workers
- Colleagues and contract workers of companies that contribute to NatWest Group operations, products or services through our value chain
- Local communities
- Additional potentially vulnerable groups include:
  - Women
  - Children
  - Migrant workers
  - Indigenous people

(1) This is not an exhaustive list and we recognise that other groups may be impacted.

Our identified salient human rights issues

Data protection and privacy

These include a failure to respect privacy rights, including the misuse or inappropriate disclosure of personal data and/or customer data.

Labour rights issues and unjust working conditions

These include forced labour, including slavery and child labour, the violation of the right to freedom of association and collective bargaining, discrimination in pay, excessive working hours and unjust working conditions affecting mental and physical health and safety.

Conflict and security

These include activities that lead to, or exacerbate, local conflict or the harmful use of security forces against local communities and workers which may endanger their lives, expose them to cruel, inhuman or degrading treatment or negatively affect their right to liberty and security.

Discrimination and lack of support for the vulnerable

These cover discrimination in recruitment, employment practices and service provision based on personal and protected characteristics which leads to inequality and lack of support for the vulnerable.

Land rights

This includes forced evictions, natural resource depletion and/or contamination, which could impact the right of self-determination and standards of living and health.

Contribution to climate change

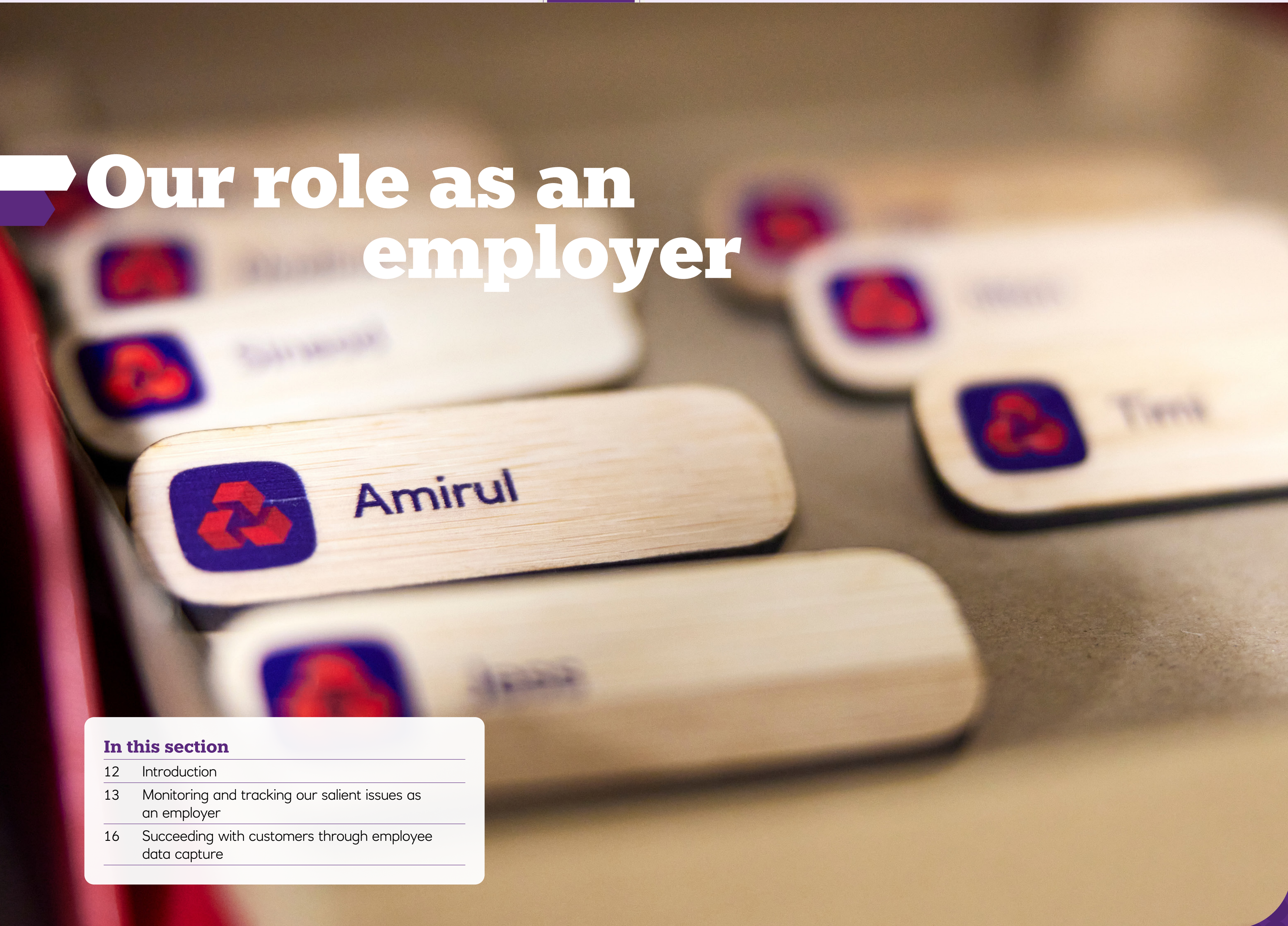
This includes both physical and transition risks and covers the negative impact of climate change on rightsholders' (particularly vulnerable communities') health and livelihoods and standard of living.

The table below indicates in which of our roles these salient human rights issues have the greatest potential to occur if action is not taken to prevent or address them.

issue	employer	procurer	retail banker	commercial banker	investor
Data protection and privacy	●	●	●	●	●
Labour rights issues and unjust working conditions	●	●		●	●
Discrimination and lack of support for the vulnerable	●	●	●	●	
Contribution to climate change		●		●	●
Land rights				●	●
Conflict and security				●	●

This prioritisation of salient human rights issues by role allows us to focus our efforts on carrying out a more in-depth assessment, including evaluation of our processes and policies. At the same time, we will continue to monitor and, if required, address the salient human rights issues in our other roles as well.

Our role as an employer



In this section

Introduction

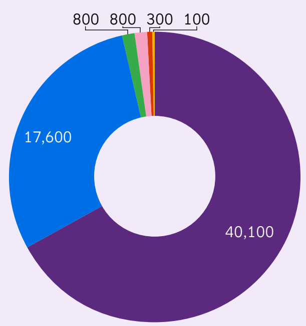
We put our colleagues at the heart of our business. We are passionate about supporting them in what they do and providing them with the capabilities and platform they need to win together with customers. We recognise that the skills our people need in the future will be different from those of today.

Our salient human rights assessment for our role as an employer considered the severity and likelihood of issues across our predominantly UK workforce alongside the other geographies where we employ people. We operate in a highly regulated sector and adhere to the laws of the jurisdictions in which we operate. The scope of the employer role relates to our employees. Suppliers, including third-party workers, are covered in the procurer role section of this report.

The saliency assessment was informed by our engagement with colleague representative groups. In the role of an employer, we concluded that three salient human rights issues have been identified:

- Data protection and privacy
- Labour rights issues and unjust working conditions
- Discrimination and lack of support for the vulnerable

Employees by location[1]



- United Kingdom: 40,100
- India: 17,600
- Poland: 800
- Rest of World: 800
- United States of America: 300
- Republic of Ireland: 100

Managing salient human rights as an employer

In addition to Our Code, which is key in letting colleagues know what conduct and behaviours are expected of them at work, we have several policies, practices and mitigations in place to manage these inherent risks. These include:

- Our Behaviours
- Our Yes Check
- Colleague listening channels
- Grievance channels, including Speak Up and Resolving Issues at Work
- Pre-employment screening and fair recruitment practices
- Wellbeing support
- Diversity, Equity and Inclusion principles and targets
- Data protection and privacy policies
- Our Fair Pay Charter
- Pension and benefits schemes

For further information refer to Working at NatWest Group page and Our behaviours page on the NatWest Group website.

Following the publication of our salient human rights issues:

- We monitored key legislation in areas related to these salient human rights issues.
- We reviewed several colleague policies from a human rights perspective and concluded no material changes to these policies were required.
- We achieved re-accreditation as a Regional and Global Living Wage Employer.
- We introduced a new Anti-bullying, Harassment and Discrimination policy with accompanying support material and training to support colleagues.

Areas of forward focus:

- To further develop our employee privacy practices, particularly in relation to the greater integration of artificial intelligence into bank processes and systems.
- To further develop the clarity and control of personal data for colleagues.
- To continue to review our Diversity, Equity and Inclusion (DE&I) targets.

(1) All data is for NatWest Group as at 31 December 2024 based on active permanent colleagues (including fixed term contractors and excluding, temporary staff).

Monitoring and tracking our salient issues as an employer

Data protection and privacy

We take the collection and handling of our colleagues' personal information seriously and comply with all applicable laws, regulations and guidelines. However, as a large employer operating across different geographies, we acknowledge there is a risk to employees of failing to respect their privacy rights, including the misuse or inappropriate disclosure of personal data.

Privacy policies

To mitigate these risks, we have a Privacy and Client Confidentiality (P&CC) policy which sets out the rules everyone is expected to follow to ensure compliance with relevant legal and regulatory requirements, and role responsibilities. The policy requirements are embedded within our risk processes and are subject to controls. The pan-bank privacy framework is based on UK and EU General Data Protection Regulations (GDPR) as best in class privacy legislation.

NatWest Group continues to assess and improve its privacy maturity. In 2025, significant work is underway to embed and increase visibility of Privacy & Client Confidentiality risk within the established Enterprise Wide Risk Management Framework (EWRMF). This involves building out the mapping of relevant material privacy and client confidentiality rules and linking them to adequate and effective operational controls and measures which aim to mitigate and manage those risks. This will give a more comprehensive view of privacy compliance across the bank leading to enhanced privacy protection for customers and colleagues as part of a more mature risk-based privacy model.

Colleague control and clarity

Our Employee Privacy Notice is updated regularly and explains how we collect, process and hold certain personal information about our employees. Colleagues are informed: how to exercise their rights; where relevant, how to withdraw consent/object to the processing of their personal data at any time; how to make a complaint; and that they can request to see the information the bank holds on them by making a subject access request.

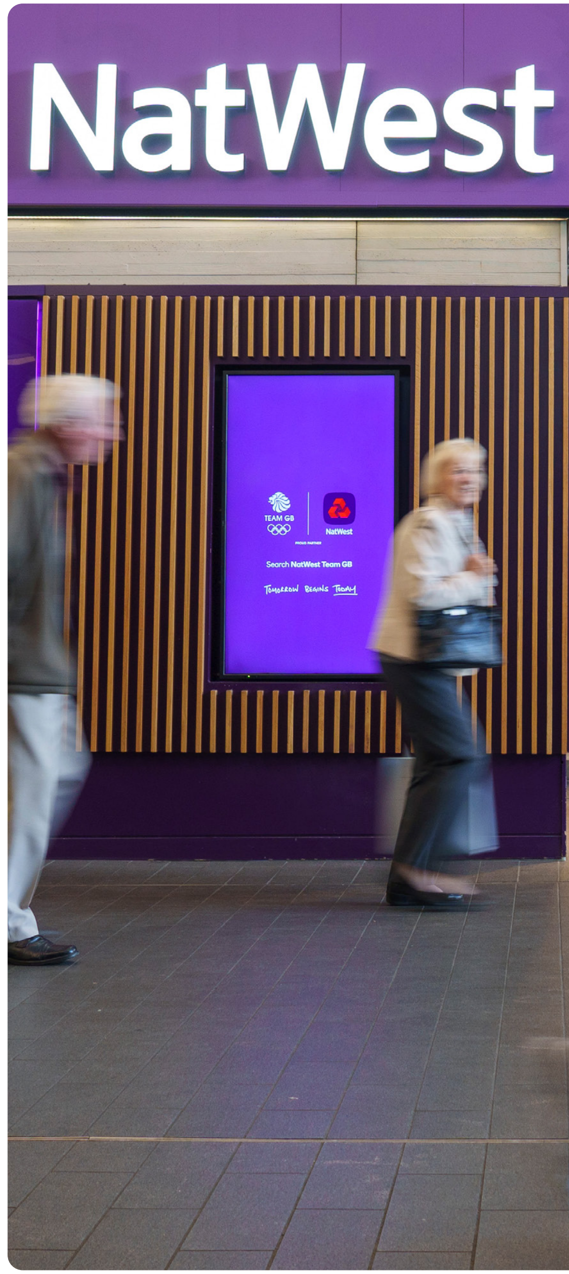
We are updating our human resources platform to improve clarity and control of personal data for colleagues. Once the update is complete, we plan to use the evidence-based findings and gap analysis provided by Privacy Rules Mapping to further improve our employee privacy practices.

Artificial intelligence

In order to understand and address data protection and privacy risks associated with artificial intelligence (AI), work has been undertaken on newly created AI internal governance processes, including first use of our internal Ethical AI Assessment process to assess potential use of AI to assist recruitment, taking into account output from the Information Commissioner's Office on AI, recruitment, and candidate/employee rights.

We are seeking to enhance the Privacy Impact Assessment process to detect, review and opine on risks posed by greater integration of tools and the use of AI.

For further information refer to Protecting privacy and customer confidentiality at natwestgroup.com.



Monitoring and tracking our salient issues as an employer continued

Labour rights issues and unjust working conditions

Respect for workers' rights and compliance with labour standards are the foundation of decent work. As an employer, we are committed to respecting human rights and supporting international labour standards. We acknowledge the importance of creating a healthy environment and structure around work and home life for all of our employees. We recognise that, given our large and diverse workforce, there are risks we must mitigate to promote and implement responsible and inclusive workplace practices.

Mitigating slavery and forced labour

As outlined in our 2024 Modern Slavery and Human Trafficking Statement, our Pre-Employment Screening (PES) policy seeks to limit the risk of forced and compulsory labour in our workforce by ensuring PES has been completed on newly hired employees by NatWest Group, non-employees (contingent workers) by the recruitment agency and third-party supplier workers by the supplier before they can join us. These include (without limitation and to the extent legally permissible): identity, right to work, activity, address, credit, criminal, global sanctions and fraud checks.

International Labour Organization

The International Labour Organization's Declaration on Fundamental Principles and Rights at Work (ILO) are taken into consideration when developing policies, procedures and training for employees. As an employer we consider we are in alignment with the following ILO Conventions:

- Forced Labour Convention
- The Freedom of Association and Protection of the Right to Organise Convention
- The Right to Organise and Collective Bargaining Convention
- Equal Remuneration Convention
- The Abolition of Forced Labour Convention
- Discrimination (Employment and Occupation) Convention
- Minimum Age for Employment Convention
- Occupational Safety and Health Convention
- The Worst Forms of Child Labour Convention

Freedom of association and collective bargaining

We formally recognise employee representative bodies including trade unions, works councils and employee consultative bodies, and consider our regular engagement to be a vital means of transparency. We engage with our employee representative bodies on topics of mutual interest and undertake consultation and collective bargaining on pay in line with our agreements with them. The CEO and Group Chief Operating Officer meet with our employee representative bodies annually to discuss matters of strategic interest.

We respect our employees' right of freedom of association across all our businesses, and information about our employee representative bodies is available to our employees on our intranet. Approximately 70% of our employees are covered by a collective agreement and/or employee representative arrangements.

Colleague engagement and wellbeing

Board-level reporting from the Group CEO and the executive management team includes insights on colleague engagement, wellbeing, and development. To promote colleague voice in the boardroom, we use a multi-channel approach through a number of listening and reporting tools to provide representation from across the bank and safeguard against the risks of relying on a single source to gather views.

These tools include the Our View colleague engagement survey and the Colleague Advisory Panel (CAP), which is our direct communication channel between the Board and colleagues. The CAP met with representatives from the Board twice in 2024, in May and November. Panel members and directors discussed and shared views on executive remuneration and the wider workforce, performance management, the evolution of the bank's purpose and responsible embedding of AI. Discussions are reported to the Board by the CAP Chair, who subsequently updates panel members to close the feedback loop.

Our wellbeing team promotes a range of tools, learning and insights to support colleagues' physical, mental, social and financial wellbeing. This includes access to our free, confidential and independent Employee Assistance Programme, a Virtual GP service and access to the Bank Workers Charity.

Fair pay and financial security for colleagues

We are proud to be an accredited Living Wage Employer, demonstrating our commitment to setting pay levels above the real living wage rates. In 2025, we furthered our commitment to fair pay by achieving re-certification as a Global Living Wage Employer.

For further information refer to Our 2024 Modern Slavery and Human Trafficking statement and Our Fair Pay charter at natwestgroup.com, and Our colleagues in the 2024 Annual report and Accounts.

Monitoring and tracking our salient issues as an employer continued

Discrimination and lack of support for the vulnerable

NatWest Group is committed to creating a diverse, equitable and inclusive workplace free from bullying, discrimination, victimisation or harassment.

We recognise the constant need to mitigate against harm effectively across all of our geographies. We do not tolerate bullying, harassment, discrimination or any other forms of intimidation and we manage risks in a number of ways, including the practices that follow.

Compliance with discrimination law

We comply with the 2010 UK Equality Act and all other relevant employment and anti-discrimination laws. Our colleagues undertake mandatory and complementary learning across a range of relevant topics regarding anti-discrimination.

Anti-bullying, Harassment and Discrimination policy

In 2024, we introduced our new standalone Anti-bullying, Harassment and Discrimination policy to support this commitment. The policy covers how we expect our colleagues to behave, in the workplace and at work-related events, so our colleagues, customers and other third parties we deal with are treated and treat us with dignity and respect.

Whistleblowing

We encourage anyone to raise concerns or a complaint if they experience, or become aware of, bullying, harassment, discrimination or victimisation. We provide several ways in which matters can be resolved or complaints addressed. These include an informal conversation between parties, mediation, a formal grievance procedure or use of our whistleblowing channel – Speak Up.

Recruitment

To drive inclusion in recruitment we regularly update our Recruitment Yes Check. This is guidance to keep Diversity, Equity and Inclusion (DE&I) and candidate experience front of mind at every stage in the recruitment process. We mandate inclusive interview training for all hiring managers and we have expanded our Inclusive Interview Ambassador team to over 900 – their purpose is to bring diversity of thought to interview panels.

Employment practices

We continue to embed our inclusion principles, which form part of the Employee Risk Standard, to provide our colleagues with the minimum standards of behaviour towards each other, our customers, communities, suppliers and other stakeholders. These apply to all colleagues who work for NatWest Group, and state:

- Inclusion is recognised as being good for the whole of our business and therefore applies to employees, customers, suppliers, community and all other third-party stakeholders.
- We abide by the laws in the countries in which we operate and ensure that our policies and processes are aligned to the legislation of that country in respect of inclusion.
- We provide training on inclusion for all colleagues.
- We prioritise our activities and efforts on inclusion, moving at different paces based on what is appropriate to the specific protected characteristic and our own organisation.
- We respond to legislative changes and, where possible, implement what is recognised as 'best practice' rather than the legislative minimum to demonstrate our support of the inclusion agenda.

Across the organisation we continue to keep our colleagues safe from discrimination through a number of other supportive materials such as Our Code, our Yes Check, and our DE&I strategy.

On an annual basis, we provide training to all colleagues to help them understand their legal obligation to not discriminate. This includes recognising bias and how they can influence our behaviours and decision-making and how to challenge non-inclusive behaviours.

We make workplace adjustments to support colleagues with disabilities and long-term conditions to succeed. If a colleague develops a disability or long-term condition, NatWest Group will, wherever possible, make adjustments to support them in their existing job or re-deploy them to a more suitable alternative role.

We continue to engage and listen to our colleagues to understand their experiences through focus groups and our eight Employee-Led Networks (ELNs), which have c.27,000 members.

We continue to support our people managers to manage their teams by having fair and objective discussions through our bias checker.

For further information refer to Responsible business – how we operate in the 2024 Annual Report and Accounts. For more detail on our approach to customers in vulnerable situations refer to the retail banker section of this report on pages 24 and 25.

CASE STUDY

Succeeding with customers through employee data capture

Demographic data capture across jurisdictions

We have proactively strengthened our data capture mechanisms to improve clarity, and inclusivity across all jurisdictions in which we operate.

Actions taken

To reinforce the integrity and transparency of our demographic data collection and usage:

- We conducted a comprehensive review of the platform's demographic fields used for reporting purposes in different regions.
- Privacy notices were reviewed and enhanced to ensure, from a user perspective, we clearly communicated the purpose and use of any demographic data that was collected.
- Upgrades were made to strengthen how our data is securely stored.
- User choice was augmented by offering expanded self-identification options in line with best practice.

Outcomes

- We ensured that local requirements across all jurisdictions were met.
- The platform's effectiveness was enriched through more accurate representation within a flexible framework.
- Employee understanding of how their information was used improved significantly.

Our role as a procurer

In this section

Introduction

We procure goods and services ranging from computers and catering to credit scores and consulting services.

We expect suppliers to uphold the same values as NatWest Group and encourage them to implement the same standards with their own subcontractors.

Our salient human rights assessment for our role as a procurer considered the severity and likelihood of issues across our supply chain. This included looking across our third-party and contracted workers who may be located in our offices working directly with our customers and/or colleagues. It also included our property services contracts which also cover our cleaning, catering and security services.

In support of our operations, we purchase goods and services from suppliers. In 2024, we found 60% of all suppliers with a managed contract(1) are based in the UK or the Republic of Ireland.

The saliency assessment was informed by our engagement with internal and external stakeholders, including a supplier. In the role of a procurer, we concluded that four salient human rights issues have been identified:

- Data protection and privacy
- Labour rights issues and unjust working conditions
- Discrimination and lack of support for the vulnerable
- Contribution to climate change

Managing salient human rights as a procurer

To manage these inherent risks we have several policies, practices and mitigations in place for the procurer role:

- Third-party Inherent Risk Questionnaire (IRQ)
- Privacy Impact Assessments
- Location Risk Assessment
- Transfer Impact Assessment
- Pre-Employment Screening (PES) contractual clauses
- Whistleblowing policy
- EcoVadis Assessments
- Supply chain emissions tracking
- Supplier Code of Best Practice

For further information refer to Supply chain at natwestgroup.com.

(1) Contracted suppliers are vendors matched to a contract and managed by a Supply Chain Manager.

Following the publication of our salient human rights issues we have:

- Updated the Supplier Code of Best Practice (formerly the Supplier Charter) which provides guidance and outlines our expectations of suppliers. Alignment with the code is a key consideration during tender evaluations and contract renewals. We expect our suppliers to abide by all applicable laws, regulations and standards in the industries and locations in which they operate.
- Maintained immediate payment on receipt of goods and services, which supports our suppliers, and goes significantly beyond the UK Government's Fair Payment Code (previously Prompt Payment Code) which encourages businesses across the UK to pay fairly and quickly.
- Improved our supplier emissions data journey to transition from sector-based emissions estimates to supplier-specific data.
- Developed a mandatory standalone learning module on Modern Slavery and Human Trafficking for colleagues in our Supply Chain and Third-Party Risk Management business areas with a completion rate of 94%.
- Worked with anti-slavery charity Unseen to provide bespoke modern slavery training for our SMEs and small suppliers in UK and India.
- Continued to encourage our suppliers to complete an EcoVadis assessment, to improve and maintain our sustainability performance across key areas including environment, labour and human rights, ethics, and sustainable procurement.

Areas of future focus:

- Expand our supplier and business area engagement to better measure supplier climate maturity and help inform choices across our supply chain.
- Continue to further improve the accuracy of our emissions reporting through experimentation.

Monitoring and tracking our salient issues as a procurer

Data protection and privacy

We recognise, when suppliers collect and process data relating to our customers and/or colleagues, the need to safeguard the data protection rights of these individuals.

A number of tools are used by NatWest Group including completion by suppliers of a third-party Inherent Risk Questionnaire (IRQ) which helps to identify data impacts and risks.

Our Privacy Impact Assessment (PIA) assesses any privacy impacts arising from the processing of personal data undertaken by a third-party supplier.

Our Transfer Impact Assessment (TIA) Mandatory Procedure sets out NatWest Group's requirements in all relevant jurisdictions before a transfer can be made. A data sharing agreement, or data protection clauses in our third-party agreements, are required before data can be shared.

For further information refer to Protecting privacy and customer confidentiality at natwestgroup.com.

Labour rights and unjust working conditions

As a procurer of services that involve labour, NatWest Group recognises the importance of assessing the potential for forced labour or modern slavery in our supply chain. This can be either onsite, such as cleaning and catering services, or in remote locations, such as technology, textiles and construction.

In June 2025, we published our ninth Modern Slavery and Human Trafficking Statement which sets out the steps that we are taking to identify and address modern slavery and human trafficking, including labour rights and unjust working conditions in our own operations and in our supply chain.

Our IRQ is required to be completed by all suppliers, which supports in identifying labour impacts. IRQs are carried out at onboarding and renewal, or where a material change occurs in the service supplied.

Pre-Employment Screening (PES) contractual clauses are in place to ensure the same level of screening is completed both internally in the bank and externally. Our PES policy seeks to limit the risk of forced and compulsory labour in our third-party supplier workforce. This includes (without limitation and to the extent legally permissible) identity, right to work, activity, address, credit, criminal, education, and fraud checks.

To improve and maintain our sustainability performance across key areas including environment, labour and human rights, ethics, and sustainable procurement, we work with EcoVadis, a leading organisation providing third-party evidence-based assessments of sustainability performance. We encourage our suppliers to complete an EcoVadis assessment. 74%[(1)] of NatWest Group's contracted supplier spend[(2)] either possess an active EcoVadis scorecard or have submitted a new assessment and are in the process of receiving a new scorecard.

One of EcoVadis' four core assessment pillars is labour and human rights. It assesses employee health and safety, working conditions, social dialogue, career management and training, child labour, forced labour and human trafficking, diversity, discrimination and harassment and external stakeholder human rights.

On labour and human rights, our average NatWest Group score is 80% and our suppliers score is 61.9% (+3.2 on 2023) which is above the EcoVadis average of 50.5%. Where a supplier falls below the global EcoVadis average (47%), a corrective plan is initiated and, if appropriate, is discussed at supplier meetings.

Collectively, suppliers have improved their EcoVadis scores year on year, averaging 13% higher than the EcoVadis Global Average.

EcoVadis also monitors specialist media (including but not limited to trade unions, sustainability networks, NGOs, labour watch and local media) to gather news and insights relevant to the assessed entity and sustainability. This helps to provide due diligence beyond the documentation provided by the supplier.

EcoVadis helps us to understand and measure our own performance against core ESG pillars, enabling us to identify social, environmental and ethical improvements. NatWest Group scored 68% overall in 2024 (67% in 2023), ranking in the 89th percentile.[(3)]

For further information refer to Our 2024 Modern Slavery and Human Trafficking statement.

(1) Reporting spend period is 1 November 2023 to 31 October 2024.
(2) Contracted suppliers are vendors matched to a contract and managed by an Supply Chain Manager.
(3) EcoVadis valid scorecard data is from 1 January 2024 to 31 December 2024.

Monitoring and tracking our salient issues as a procurer continued

Discrimination and lack of support for the vulnerable

The bank procures resource that is deployed to support and manage frontline engagements with potentially vulnerable customers.

We do not tolerate any form of conscious or unconscious discrimination of individuals or groups by suppliers for any reason, during or after the recruitment process. We manage this by:

- Asking all suppliers to complete our third-party IRQs which support the identification of vulnerable customers in compliance with the Financial Conduct Authority's Consumer Duty.
- Encouraging all third-party suppliers to raise concerns or complaints if they experience or become aware of discriminatory practices by NatWest Group employees through our whistleblowing channel Speak Up.

More detail on our approach to customers in vulnerable situations can be found in the retail banker section of this report on pages 24 and 25.

Contribution to climate change

We are committed to procuring goods and services in an environmentally responsible manner, while recognising the role of our suppliers in combating the impacts of climate change and the transition to net zero.

Own operations emissions

On our path to achieve our 2030 science-based targets, in 2020 we set interim ambitions for our direct own operations to reduce emissions by 50% by 2025 from a 2019 baseline, for emissions where we consider we have the greatest ability to influence reductions, for example through energy efficiencies, reducing travel, property portfolio right-sizing, and our resource use.

In 2024, we achieved all of these and met our 2025 ambition, reducing direct own operations emissions by 51% against a 2019 baseline. All activity is supported by a focus on continuous data improvement and methodology enhancements. The most material reduction in emissions occurred within upstream Scope 3 categories 1, 2, and 9 as well as location-based Scope 2 emissions. Scope 3 emissions reductions result mainly from our supply chain decarbonising, with location-based Scope 2 emissions reductions from grid greening as more renewable electricity is added to national electricity grids and energy efficiency work is undertaken on portfolio right-sizing.

Supply chain emissions

Our supply chain emissions formed 65% of our 2024 operational emissions, offering a key opportunity for decarbonisation.

- Total supply chain emissions have reduced by 40% between 2019 and 2024.
- As we predominately use spend-based methods, changes in influenced spend[1] will directly impact emissions.
- An update to the industry-average emission factor database has been the main contributor to the reduction in purchased goods and services emissions in 2024. Therefore, we continue to work with suppliers to obtain supplier-specific data to reduce our reliance on industry averages emission factors and to measure the trajectory of supplier emissions to help inform choices across our supply chain.

Looking ahead: supplier emissions

As our supply chain emissions account for the majority of our operational carbon footprint, we aim to use supplier climate data with ESG risk combined weightings to measure supplier climate maturity and help inform choices across our supply chain. This ambition is supported by:

- **Engagement:** Expand our supplier and business area engagement during 2025 to further develop cross-departmental support as well as supplier and service-specific data provision.
- **Data:** Continue to improve the accuracy of our emissions reporting through experimentation.

Supplier data collection

This is the second year of our supplier data improvement journey, focusing on the suppliers with the highest contribution to our emissions. In 2024, we continued supporting our suppliers to measure, report and reduce their emissions. We provided suppliers who accounted for 70% of our reported 2023 supply chain emissions with free access to respond to the Carbon Disclosure Project (CDP) supply chain module. This enabled further transparency within our climate reporting by improving our supplier-specific data from 18% of suppliers by emissions reported in 2023 to 39% in 2024 as part of our hybrid methodology.[2] Switching from industry average to supplier-specific emission factors reduced supplier carbon intensities by 62% in 2019 and 56% in 2024.

We communicated our decarbonisation ambitions and the role of both CDP and EcoVadis in our decarbonisation journey to the suppliers who account for the highest emissions. This communication aimed to help them understand the requirements to respond effectively to both questionnaires. Insights were also provided to our suppliers on the benefits to their decarbonisation journey.

For further information refer to Supporting the climate transition in the 2024 NatWest Group Sustainability Report and our Climate-related disclosures in the 2024 Annual Report and Accounts.

(1) Influenced spend is spend associated with the procurement of purchased goods and services which NatWest Group directly controls. It does not include spend categories such as regulatory fees, commission and general fees, international taxes, customer passthrough costs, and spend attributed to emissions in other categories/scopes of our carbon footprint.

(2) Hybrid methodology combines supplier-specific emissions data (tCO_2e/£) with industry averages (tCO_2e/£) service-specific (tCO_2e/FTE) and product-specific (paper, water and mail).

CASE STUDY

Succeeding with customers through community engagement

Working with Unseen to understand modern slavery risks and raise awareness

We continue to work closely with the UK charity Unseen and are members of the Unseen Business Hub community, to help us further our knowledge of modern slavery and to help us to identify, prevent and address modern slavery.

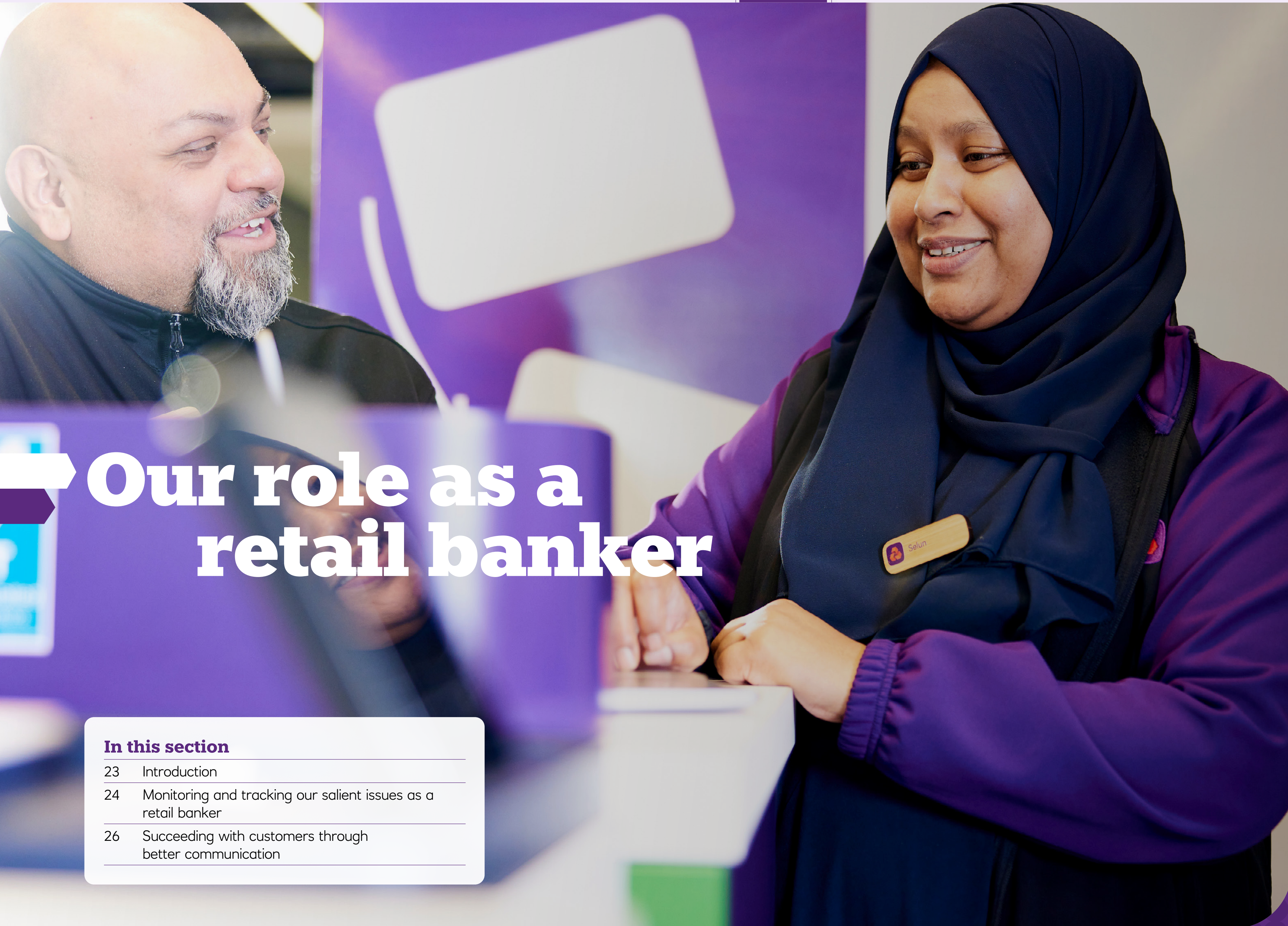
E-learning

We created a standalone modern slavery e-learning module available to all colleagues. In 2024, this module was refreshed in collaboration with Unseen, integrating updated content that highlights key red flag indicators. We also developed a more tailored module specifically for colleagues engaged in roles with a higher likelihood of encountering modern slavery during their day-to-day activities within Supply Chain and Third Party Risk Management, which had a completion rate of 94%. This approach helps us ensure that our training is comprehensive and relevant to various job functions within the organisation.

Awareness events

To coincide with Anti-Slavery Day on 18 October 2024 we organised a series of events, which included presentations, a webinar and an in-person fireside panel featuring discussions with experts in financial crime, law enforcement agencies, and modern slavery charities, including Unseen. These sessions allowed our colleagues to discuss the challenges we face, and the progress made in managing modern slavery issues effectively. Notably, our financial crime teams shared insights into their successful collaboration with law enforcement, which led to the identification and charging of four individuals linked to human trafficking and money-laundering offences.

unseen



Our role as a retail banker

In this section

Introduction

In Retail Banking, we aim to be a trusted financial partner for our 18.1[(1)] million customers by offering personalised experiences through our competitive products and tailored insights. We aim to support our customers every day and through every important life moment, whether they're opening their first account, managing their money, saving for the future or experiencing a difficult time such as a bereavement.

Our salient human rights assessment for our role as a retail banker considered the severity and likelihood of issues based on our predominant UK locations and customer demographics. Our support to future generations, through our youth accounts such as Rooster, is increasing, and we support individuals and families with a range of financial products and services, striving to win with our customers through the most simple, engaging and personalised digital experience in the UK.

Two salient human rights issues were identified for our retail banker role:

- Data protection and privacy
- Discrimination and lack of support for the vulnerable

Managing salient human rights as a retail banker

To manage these inherent risks and reduce the potential of human rights harm we have several policies and mitigations in place for the retail banker role:

- Customer in Vulnerable Situations Regulatory Compliance Operational policy (RCOP)
- Data Protection and Privacy policies
- Subject Access Requests
- Complaints procedures
- Frontline and journey colleague training
- Inclusive Design Panel
- Specialist services such as Bereavements and Financial Support team
- Customer Protection Managers
- Banking My Way

For further information refer to Society on natwestgroup.com.

Following the publication of our salient human rights issues we:

- Made improvements, through our Banking Facilities for All (BFFA) initiative, to the account opening process for UK residents who face difficulties providing traditional identification documents. This includes simplifying and clarifying guidance on who can provide a Letter of Introduction, which should reduce account opening times for vulnerable customers.
- Expanded categories available through our Banking My Way service to include 13 additional options that better reflect customer needs, allowing them to make us aware of any vulnerabilities and related support needs.
- Provided 63,000 colleagues with consistent training to recognise and respond to customers in vulnerable situations.

Areas of future focus:

- To continue to increase awareness of how to support our most vulnerable customers with mandatory training in 2025.
- To provide support tools and mechanisms that allow customers to bank with us, successfully and independently, no matter their situation.

(1) Retail Banking customers including Premier and Rooster customers and excluding secondary cards.

Monitoring and tracking our salient issues as a retail banker

Data protection and privacy

Privacy is a vital component of serving our customers and is therefore embedded across NatWest Group and its subsidiaries. We recognise that responsible practices are needed to ensure we always address privacy and grow trust and customer advocacy.

To respect the fundamental data privacy rights of individuals and safeguard the personal data of our customers we have a Privacy and Client Confidentiality (P&CC) policy which sets out our ethical approach and the rules all of our colleagues are expected to follow. The policy ensures compliance with relevant legal and regulatory requirements, and role responsibilities. It is embedded within our risk processes and is subject to rigorous controls.

Transparency

NatWest Group has adopted an accessible approach which follows regulator guidance to provide information about how we use our customers' data in the privacy notices on our websites. Privacy notices are aligned to each part of our business and can be found on our websites.

An example of a customer privacy notice covers:

– How we collect their personal information and what we use it for
– Why we might share their personal data and with whom
– Their rights
– How long we keep their information

Privacy notices are subject to regular review to ensure they remain up to date and accessible to users across all digital platforms.

Responding to individuals who exercise their rights

We need information to provide our customers with the right products and services, but they have clear rights over what we do with that information.

We have specialist teams who respond to queries relating to data subject rights. In addition, we engage with relevant regulators and industry bodies as appropriate.

We review each breach on its facts and look to foster a culture where individuals are encouraged to report, understand the serious consequences of a data breach, and actively learn from their errors and improve their day-to-day working practices. Our colleagues responsible for a privacy breach may be subject to disciplinary action under our Disciplinary policy where appropriate.

Our change governance process also requires all change initiators to consider the impact of the change on our privacy and client confidentiality policy and to complete a privacy impact assessment.

For further information refer to Protecting privacy and customer confidentiality at natwestgroup.com.

Discrimination and lack of support for the vulnerable

We acknowledge that any customer may face vulnerability at some point in their financial lives, so our approach is to ensure that our products, propositions and services are designed to meet the needs of all customers, including those with different characteristics of vulnerability.

We are always seeking the right insights to best understand the needs of our diverse customer base to develop products, services and tools that cater to their needs, from helping them access a bank account to managing their financial wellbeing.

Customers in vulnerable situations

Our Customers in Vulnerable Situations policy, principles and standards outline our approach across all franchises, functions and legal entities. This framework ensures consistent minimum standards to help colleagues deliver good outcomes for customers.

We offer additional support where needed, whether it's assisting customers with specific accessibility needs or supporting those who are struggling to manage their finances. We aim to create an inclusive and accessible banking environment that enables customers to navigate their financial journeys effectively.

Aligned with FCA guidance[(1)], we recognise the four key drivers of vulnerability: health, life events, resilience, and capability.

Banking My Way

We want our customers to be able to bank with us with the right support in place; customers can inform us about their situation and support needs through Banking My Way.

Accessible through the mobile bank app, online, in our branches, or via telephone teams, Banking My Way enables customers to select the support they require from a range of adjustments, including a sign language interpreter, braille statements, or simply speaking more slowly. This system allows us to better understand our customers' needs and tailor the service we provide.

Banking My Way ensures that our frontline colleagues are aware of these requirements every time the customer contacts the bank – enabling us to offer the appropriate support during each interaction. Our Wealth business has an equivalent where customers can contact their relationship manager.

(1) FG21/1 FCA Guidance for Firms on the Fair Treatment of Vulnerable Customers.

Monitoring and tracking our salient issues as a retail banker continued

Three-tier customer support model

NatWest Group has implemented a three-tier customer support model for Customers in Vulnerable Situations, supported by consistent colleague training:

Tier 1 – Self Service: Utilising our digital channels, including technical support in branches, customers can meet their needs in a manner and at a time that suits them. Our dedicated Digital Accessibility Team regularly tests app and website updates to ensure functionality.

Tier 2 – Supported Service: Customers can seek general assistance by speaking to colleagues in branch, over the telephone, or via webchat.

Tier 3 – Specialist Service: Customers can access support from highly trained specialists for complex or challenging needs. This includes dedicated teams for those struggling to repay borrowing, those who have experienced bereavement, and those concerned about fraud on their account. Our Customer Protection Managers are trained to support difficult life circumstances such as domestic or economic abuse or life changing diagnoses.

All customer facing colleagues have received training in the 4Rs, namely: Recognise, Respond, Record, and Refer, with the latter including internal referrals to our Customer Protection Managers and external referrals to established partners such as debt advice charities and Citizens Advice among others.

We ensure all colleagues of the bank undertake annual training on customer vulnerability so that they can understand the role they play in supporting customers. This includes additional training for those involved in product and proposition design on 'Designing for All' including learnings from our Inclusive Design Panel.

We have partnered with a range of organisations both to help customers in their interactions – such as language translators and British Sign Language services – and raise awareness of these support mechanisms to our customers.

Inclusive design

We adopt an inclusive design approach and actively leverage testing and feedback from individuals in vulnerable situations to aid in both pre-launch development of our propositions and ongoing improvements post-launch, as demonstrated by our Inclusive Design Panel and customer research reports.

Our vulnerability data informs our product and service design strategy and is sourced from both disclosed and data-driven vulnerability characteristics. In our Retail business, any new or material changes to our products or services undergo Product Governance. As part of this initiators must consider various vulnerability characteristics and their potential impact resulting from the change through completion of a Customers in Vulnerable Situations Impact Assessment. This serves as a trigger point to evidence consideration and mitigation strategies for vulnerable customers. There is an equivalent approach in our Wealth business.

Metrics and monitoring

Once propositions are live, we conduct continuous monitoring through our Good Customer Outcome Management (GCOM) approach. Additionally we have reporting aligned to Consumer Duty on outcomes across Price & Fair Value, Consumer Understanding, Consumer Support, and Products & Services where we specifically include insight relating to customers with characteristics of vulnerability.

We use a variety of evidence types to regularly monitor, test and assess that our propositions meet the evolving needs of our Customers in Vulnerable Situations (CiVS). These includes monthly management information and analysis focused on the five key pillars of delivering good outcomes as set out in the Consumer Duty regulations, as well as regular testing of digital accessibility in the app and website, and obtaining feedback from customers with lived experience of vulnerability characteristics through our Inclusive Design Panel or customer research.

We have established metrics across all of our franchises to monitor instances of discrimination and lack of support for vulnerable individuals as part of addressing salient human rights issues. These metrics provide key internal stakeholders with visibility into our monitoring processes. We will continue to track metrics related to positive outcomes for vulnerable customers and expand our understanding of how characteristics of vulnerability affect customer outcomes.

For further information refer to Supporting customers in vulnerable situations at natwestgroup.com.

CASE STUDY

Succeeding with customers through better communication

More than just banking

it started with a question and a sign

Retail Banking colleague John explains how the bank's sign language service helped a D/deaf[1] customer. "She started writing and I thought 'there must be a better way for us to communicate."

When Daria (not her real name) came into the NatWest Bromley branch to query a payment on her account, the first challenge she faced was explaining what the problem was. John took the customer to a private room and it became clear once she used a pen and paper to start writing things down that she was deaf.

Although he'd never used it before, John knew the bank offered a sign language translation service called SignVideo. John was able to use the app and was immediately put through to Claire at SignVideo.

Claire used sign language to ask the customer how we could help and translated Daria's response back to John. "We were able to have a really great conversation and Daria was really wowed!" says John.

Keen to ensure we were able to continue offering the right support for Daria, John introduced our Banking My Way service, which allows customers to share their specific support needs with colleagues every time they contact the bank.

"I noticed she didn't have any Banking My Way information on her account, so I asked if she wanted to use the service to let us know how we can best support her. This would mean that every time she contacts us in future, colleagues will know she can't hear, and that British Sign Language (BSL) is her preferred method of communication."

"She thought it was great and was so thrilled that she'd be able to communicate with us in the way she wanted."

(1) We recognise customers can identify as deaf in reference to a loss of hearing or Deaf relating to a specific identity typically for those who have been Deaf their entire lives.

Our role as a commercial banker

In this section

Introduction

As a commercial banker we serve over one million customers, from supporting start-ups at launch to partnering with global institutions. As the biggest bank for businesses in the UK, we provide a full service proposition, connecting our customers with unique expertise, industry insights and the solutions they need across the various sectors, regions and markets they operate in.

Our salient human rights assessment for our role as a commercial banker considered the severity and likelihood of issues based on our geography and sector exposure as a predominantly UK-focused bank. We support large corporates across a range of sectors and aim to be the UK bank of choice for UK middle market banking. We also bank one in every five of small businesses in the UK.

All six salient human rights issues were identified for our commercial banker role:

- Data protection and privacy
- Labour rights issues and unjust working conditions
- Discrimination and lack of support for the vulnerable
- Contribution to climate change
- Land rights
- Conflict and security

Managing salient human rights as a commercial banker

To manage these inherent risks and reduce the potential of human rights harm we have several policies and mitigations in place for the commercial banker role:

- Our Environmental, Social and Ethical (ESE) Risk Framework – applies to all legal entities within NatWest Group for the onboarding of non-personal customers for the purposes of providing lending or loan underwriting services and applies to the management of ESE risk throughout these customers' lifecycles.
- Enhanced due diligence for project finance through Equator Principles
- Reputational risk screening and monitoring tools
- Onboarding questionnaires and controls including Know Your Customer
- Sanctions and Anti-Bribery and Corruption controls
- Financial Crime monitoring including red flags for human trafficking and sexual exploitation
- Data Protection and Privacy policies

For further information refer to Environmental, Social and Ethical (ESE) and reputational risk management and Detecting and preventing financial crime at natwestgroup.com.

Following the publication of our salient human rights issues we:

- Formed a commercial banker working group which focused on internally raising visibility and awareness through case studies pertaining to human rights issues.
- Developed a new standalone ESE Human Rights RAC that covers a range of sectors which have heightened risk specifically around human rights and modern slavery.
- Reviewed our ESE Defence sector RAC to ensure that the frequency and level of human rights due diligence was appropriate to times of both peace and conflict.

Areas of future focus:

- To support implementation of our ESE Human Rights RAC, we plan to roll out specific training for frontline relationship managers in 2025.
- To enhance our system capabilities to ensure we can efficiently identify customers in heightened risk sectors and develop internal reporting to support this.

Monitoring and tracking our salient issues as a commercial banker

Data protection and privacy

In our drive to be an innovative digital bank that succeeds with customers, NatWest Group collects and processes data (including personal data) in order to provide commercial customers with the right products and services. In doing so we take our legal and ethical duties around the fundamental human right of data protection and privacy seriously.

Managing commercial customer data

The Privacy and Client Confidentiality (P&CC) policy also applies when we act as commercial banker and this includes meeting our obligations around client confidentiality/banking secrecy.

We provide a privacy notice to our commercial customers which details their rights in relation to any personal data we process.

For further information refer to Protecting privacy and customer confidentiality at natwestgroup.com. For more detail on managing customer data, including how breaches are handled, refer to the retail banker section of this report on page 24.

Labour rights and unjust working conditions

We know that labour standards and working conditions can vary across countries and sectors. We are committed to reporting our progress in tackling modern slavery, and recognise the need for enhanced due diligence in high-risk sectors.

Environmental, Social and Ethical (ESE) Risk Framework

Our ESE Risk Framework covers sectors where there are heightened labour risks, including: adult entertainment; forestry, fisheries and agribusiness; metals and mining; oil and gas; and power generation. Expectations and prohibited activities are set out for these sectors which are also subject to heightened due diligence.

ESE Human Rights Risk Acceptance Criteria (RAC)

Data from the 2023 Unseen modern slavery helpline was used to help identify additional high risk modern slavery sectors for our Human Rights RAC. These include:

- textiles and clothing
- food and beverage production
- construction, services (including hospitality, security services, cleaning and catering)
- logistics (including warehousing and transport)
- health and social care.

The ESE Human Rights RAC began roll-out to the additional heightened risk sectors in 2024, with more training for relationship managers underway in 2025. We plan to update the Human Rights RAC, as appropriate, as we test and learn from it.

Collaborative approach

We recognise that we cannot tackle modern slavery in isolation, and we actively collaborate across the private sector, as well as with government, NGOs and law enforcement. We are active members of the Joint Money Laundering Intelligence Taskforce (JMLIT) and other groups to tackle economic crime.

JMLIT includes specific groups which focus on laundering illicit funds linked to Modern Slavery and Human Trafficking and Organised Immigration Crime.

Financial Crime monitoring

Our Financial Crime teams have a range of tools to support the identification of potential victims and perpetrators of modern slavery. One method is the development of a threat dashboard covering personal and non-personal customer populations with indicators based on known modern slavery typologies. There is a focus on sexual exploitation, with other typologies under development. Accounts identified by these tools are reviewed and managed accordingly.

For further information refer to Environmental, Social and Ethical (ESE) and reputational risk management and Detecting and preventing financial crime at natwestgroup.com.

Our approach to modern slavery as a financial crime

Our annual Modern Slavery and Human Trafficking Statement, published in June 2024, includes an example that relates to a business customer who was registered as a 'marketing agency'. This company displayed several red flag indicators of modern slavery and human trafficking. Transactional indicators included payments for international travel, overseas spending, purchasing of high-value goods, beauty supplies, and cash deposits.

An investigation established that several parties connected to the account were potential victims of sexual exploitation and we disclosed our suspicions to the National Crime Agency.

Discrimination and lack of support for the vulnerable

Behind every commercial business, large or small, there are real people. Sometimes, these individuals will need additional support to get the best from our products and services.

The FCA Financial Lives Survey highlights that 49% of UK adults are showing at least one characteristic of vulnerability.[1] Our colleagues are trained to understand that any one of us can be vulnerable at any given time and we follow a NatWest Group approach to identify and support these customers and colleagues alike.

Regulatory landscape – UK Consumer Duty

The recent introduction of Consumer Duty requires us to evidence the delivery of Good Customer Outcomes to both vulnerable and non-vulnerable customers. This sets high standards of customer protection across financial services and requires firms to put their customers' needs first. For vulnerable customers, this builds on the foundation set out by the FCA in FG21/1 – Guidance[2] for firms on the fair treatment of vulnerable customers. Our commercial journey teams are required to assess good outcomes for vulnerable customers as part of Good Customer Outcome Monitoring and as part of regularly evidencing that we are providing Fair Value.

Our internal approach

The Customers in Vulnerable Situations (CiVS) Regulatory Compliance Operational Policy (RCOP) outlines the standards we adhere to, supporting the delivery of good outcomes to vulnerable customers. Good outcomes for vulnerable customers is also a monitored element of our risk framework.

Complementing the CiVS RCOP, we take a NatWest Group approach to ensuring all franchises, functions and legal entities understand and align to consistent minimum standards. The vulnerability framework core principles are regularly reviewed and updated to help all our colleagues deliver good outcomes to all customers and ensure alignment with NatWest Group's strategy and purpose.

The Commercial business supports customers by allowing them to self-disclose their support need via Banking My Way, which customers can access digitally, in branch or by our telephony services. For customers who are relationship managed, Relationship Managers will support, and record on the appropriate internal system. This allows us to better understand customers' needs and tailor our service accordingly. We can also identify how we can proactively support our customers and make meaningful enhancements to our customer journeys.

For more detail on our approach to customers in vulnerable situations, including colleague training, refer to the retail banker section of this report on pages 24 and 25.

Specialist support

An example of the specialist support we can offer is a referral to a highly trained Customer Protection Manager (CPM) who specialises in supporting our most vulnerable customers who require unique and tailored support.

The CPM for our commercial customers supported 541 customers in 2024. These were across all four drivers of vulnerability: Life Events, Health, Resilience and Capability, but in the main related to Health or Life Events.

In one case of coercion, a husband had set up a business in his wife's name and built up debt through a business loan. The CPM worked with the wife to establish all of the relevant details which led to her being in a vulnerable situation. The details were shared at an internal case panel for consideration on the appropriate attribution of liability specific to the scenario. To further support the customer, she was introduced to charities and outside agencies that could support her personal circumstances.

(1) Financial Lives Survey.
(2) FG21/1 Guidance for firms on the fair treatment of vulnerable customers can be found here.

Monitoring and tracking our salient issues as a commercial banker continued

Contribution to climate change

We view climate change, the continued significant global decline in nature and biodiversity, and resource scarcity, as likely to impact our customers and society at large, both today and in the years to come. We recognise that our commercial customers have a crucial role to play in combating the impacts of climate change and supporting the transition to net zero. How and what we finance plays an important role in this work, particularly with regard to heightened climate-related risk sectors associated with energy (including oil and gas) as well as property.

Climate transition plans

Identifying, assessing and managing the risks arising from the physical effects of climate change and from the transition to a net-zero economy can help mitigate risk to our customers and society, including with regard to related human rights impacts.

Supporting our customers on their journey toward net zero remains a key driver in the ongoing development and delivery of our climate transition plan. Business teams within each sector have worked to identify products, services and business model changes to support customer transition. Where possible, this analysis has been performed at a subsector level to ensure actions most relevant to customers in these segments are identified within the climate transition plan. As a primarily UK-focused bank, we developed our climate transition plan through a UK lens.

During 2024 we continued to integrate climate considerations into our decision-making processes, including starting to roll-out our Climate Decisioning Framework (CDF) tools on a test and learn basis. These aim to provide a more structured way for colleagues to engage with customers on climate-related matters. For example, our Customer Transition Plan Assessment (CTPA) helps us understand our customers' transition journeys, and Climate Risk Scorecards aid our understanding of how our customers are managing climate-related risks.

We launched the CDF tools on a phased basis within Commercial & Institutional, as well as commercial customers within Coutts & Co, principally focused on business areas covering large corporates, mid-corporates, commercial real estate, housing associations and some financial institutions customer segments. NatWest Group continues to enhance its processes to effectively identify and assess the potential size and scope of climate-related risks to society, through three key approaches:

- Strategic analysis: to assess the ongoing resilience of our strategy, an evolving programme of climate scenario analysis has been in place since 2021.
- Portfolio-level assessment: seeks to identify customers, assets, sectors and subsectors that are likely to see increased risks for NatWest Group as a result of climate-related factors.
- Transaction level assessments, for example, controls introduced within our product design governance processes to support our teams in avoiding greenwashing and ensure that appropriate, transparent labels are adopted.

Monitoring and tracking our salient issues as a commercial banker continued

Energy supply related sectors

NatWest Group has been a leading loan arranger to the UK energy infrastructure[1] and renewables sector over the last 10 years.[2]

As a UK-focused bank it is important that we seek to support the current and future energy system. Our aim is to help our customers leading the transition, in line with our risk appetite, and Environmental, Social and Ethical (ESE) Risk Acceptance Criteria.

We have been members of the Powering Past Coal Alliance since 2021 and following the achievement of our ambition to phase-out of coal[3] for UK and non-UK customers who have UK coal production and UK coal-related infrastructure by 1 October 2024, we aim to phase out of coal[1] for customers who have coal production or coal-related infrastructure globally by 1 January 2030. As a result, we have stopped the renewal, extension or refinancing of any existing lending or loan underwriting commitments to these customers where it exceeds the phase-out date above.

During 2024 we established a working group within the Commercial and Institutional (C&I) business segment to support the development of guiding principles for the assessment of thermal and lignite coal embedded within activities like transportation, storage, supply chain and value add services, while ensuring due consideration is given to external factors such as energy security. These considerations have now been reflected in our ESE Risk Acceptance Criteria and represent an evolution of our point-in-time credible transition plan (CTP) assessment completed in 2021.

Our point-in time CTP assessment also included oil and gas major customers and supported our stated ambition to stop lending and underwriting to major oil and gas producers unless they had a CTP aligned with the 2015 Paris Agreement in place by the end of 2021.

We plan to review our climate ambitions and targets during 2025 in the context of the UK CCC's Seventh Carbon Budget. Alongside that review, we also plan to review our ESE Risk Acceptance Criteria for major oil and gas customers.

Property related sectors

We have an important role to play in supporting consumers and businesses in transitioning to more energy efficient homes and buildings, with the aim of making them more comfortable and cheaper to heat and cool.

In 2024, we developed our data-led Buildings Efficiency Assessment Tool (BEAT). This aims to help our commercial real estate (CRE) customers understand how they could make buildings more energy efficient. BEAT provides details of the associated costs of retrofitting, advice on improving EPC ratings and potential energy cost savings.

We continue to implement climate transaction acceptance standards (TAS), which require an EPC transition plan covering assets with an EPC rating of D-G, or require the calculation of an 'EPC adjusted' interest cover ratio, subject to a limited number of exceptions, for example, legally exempt from Minimum Energy Efficiency Standard (MEES) regulations.

We have an ambition to provide £7.5 billion in lending to the UK social housing sector from 1 January 2024 to 31 December 2026. In April 2025, the National Wealth Fund (NWF) announced a financial guarantee of up to £400 million to cover a series of new loans provided by NatWest Group to registered social housing providers for the retrofit of social housing stock in the UK.

For further information refer to Supporting the climate transition, Energy supply-related sectors and Property-related sectors in the 2024 NatWest Group Sustainability Report and our Climate-related disclosures in the 2024 Annual Report and Accounts.

(1) Energy infrastructure comprises battery storage, electricity distribution, electricity smart meter and electricity transmission.

(2) NatWest Group ranked first among loan arrangers by deal value for the period 2015-2024. Source: Information for Renewables (UK) 31 December 2024.

(3) Relates to thermal and lignite coal (coal that is typically used as a fuel for steam-electric power) coal production, coal-related infrastructure or transport. Data challenges, particularly the lack of granular customer information, create challenges in identifying customers with 'coal-related infrastructure' and other customers with coal-related operations within NatWest Group's large and diversified customer portfolios As such, the scope excludes companies who generate less than 5% of their revenues via coal activity (in line with Net-Zero Banking Alliance (NZBA) guidelines for climate target setting for banks), companies with a turnover of <£50 million and commodity traders. Metallurgical coal is excluded from scope as it is currently essential to the steel industry. We will continue to review our policies in line with our EWRMF, which considers a range of factors in the external economic, political, and regulatory environment.

Land rights

We are predominantly a UK-focused bank, but recognise that some of our commercial customers operate in sectors which have negative impacts on land rights issues, and there is a need for heightened due diligence.

Equator Principles for project financing

The Equator Principles (EP) are a voluntary set of standards adopted by financial institutions for determining, assessing and managing environmental and social risks in project-related transactions. NatWest Group has been a member since 2003, and while we are a predominantly UK-focused bank EP helps us mitigate land right risks (and other salient issues).

All transactions that fall within the scope of EP undergo an initial environmental and social risk screening. Typically for project finance deals, a suitably qualified technical adviser is engaged, who provides an opinion on the potential environmental and social impacts of the project and compliance with EP.

Additionally, such transactions are subject to enhanced due diligence by our ESE advisory team. This includes a review of the project-related transaction for compliance with EP. The end result is documented and forms part of the credit application pack submitted for approval. EP use a scale of categorisation – A to C – to determine the scale of environmental and social impacts, with Category A being projects with the highest impacts and Category C the lowest. Depending on the risk category, the prospective financing may be subject to a further and separate review by a Risk Committee.

The requirements of EP are embedded in the bank's ESE Risk Framework.

Equator Principles and Project Finance transactions:

During the period 1 January 2023 to 31 December 2023, 25 Project Finance transactions to which we had applied the Equator Principles reached financial close (11 for the period 1 January 2022 to 31 December 2022). 13 of the deals were located in Europe, and 12 deals were located in the United States.

ESE risk framework for high-risk sectors

Our ESE framework covers sectors with heightened risks of land rights issues. These include: forestry, fisheries and agribusiness; metals and mining; oil and gas; and power generation. Prohibited activities and other activities which are subject to enhanced due diligence are published on natwestgroup.com.

Nature impacts and land rights

Human rights and nature are interconnected as the protection of the environment is essential for securing fundamental rights such as access to clean air and water, as well as the rights of communities and indigenous peoples to their lands and resources.

We are at the start of the journey in assessing nature-related material impacts and dependencies, including indirect deforestation in our customers' supply chains, having undertaken an initial Taskforce on Nature-related Financial Disclosures (TNFD) pilot in 2024.

As a UK-focused bank, we do not have significant direct lending exposure in countries with tropical rainforest. Our exposure to in-scope direct deforestation risk-related commodity customers was £327m at year end 2024, representing 0.046% of our total balance sheet exposure. However, the UK is a major consumer of commodities linked to deforestation, with 40% of the UK's overseas land footprint being in countries with high or very high risk of deforestation. Many of our customers, along with suppliers in our value chain, will have operations that indirectly contribute to deforestation, resulting in nature-related impacts and dependencies. Consequently, they could be exposed to both physical and transition risks associated with these commodities.

Deforestation Risk Commodities reporting

NatWest Group has been reporting on commodities for ten years and for five years we have published the number of in-scope customers and the percentage demonstrating sustainable certification of their activities and supply chain.

To identify customers who operate in or import deforestation-linked commodities from tropical areas we use internal information, public information and external data providers. We re-assess those customers considered in-scope for our deforestation-linked commodity reporting on an annual basis and repeat this process for new customers. The manual process means that we gain a greater understanding of our customers and their operations, where they operate, the nature of their activities, as well as in several cases their strategy to limit and reduce deforestation.

These in-scope customers are assessed to confirm exactly which commodities they have exposure to, noting that some have several in-scope commodities. From this, customers are checked against the appropriate certification and membership bodies. A limitation to this approach is that it relies on these bodies having up-to-date membership and certification lists as well as the certifications being consistent in their zero deforestation standards.

For further information refer to Equator Principles, ESE and reputational management, Nature and climate change and Deforestation and land use on natwestgroup.com

Monitoring and tracking our salient issues as a commercial banker continued

Conflict and security

We are proud to support the defence sector, but recognise the need to undertake enhanced human rights due diligence on the defence sector in times of both peace and conflict.

Defence and Private Security Risk Acceptance Criteria (RAC)

NatWest Group offers banking services to customers operating in the defence sector where they meet our ESE risk acceptance criteria, which are published on our website. We act in accordance with the strict regulation and licensing arrangements set by the UK Government, and by relevant international standards, when engaging with companies involved in the design, manufacture, support and trade of defence equipment.

Our ESE Defence and Private Security RAC sets out prohibited activity, and restricted activity which is subject to enhanced due diligence. In 2024, we conducted a review of the ESE Defence and Private Security RAC. One area of focus was to ensure that the frequency and level of human rights due diligence was appropriate to both times of peace and conflict.

The following activity is prohibited:

Generic:

– Evidence of human rights violations[1] where the customer is unable to demonstrate that it has taken any action to cease, remediate, prevent and/or mitigate, as appropriate, the relevant violation.[2]

Defence:

– Financing of companies involved in the manufacture, sale, trade, service or stockpiling of highly controversial weapons banned under International Agreements ratified by the United Kingdom (cluster munitions, anti-personnel landmines, biological and toxin weapons, chemical weapons and blinding laser weapons) and the manufacture or sale of Bespoke Components of such weapons.

– Financing of companies involved in the manufacture, sale, trade, servicing or stockpiling of nuclear weapons in jurisdictions outside NATO countries and that are not officially involved in and accredited to the national nuclear weapons programmes of the UK, US or France.

– Financing of companies involved in the manufacture, sale or trade of defence goods where there is no (defence related) licence in place, and such is required.

Private Security Companies (PSCs):

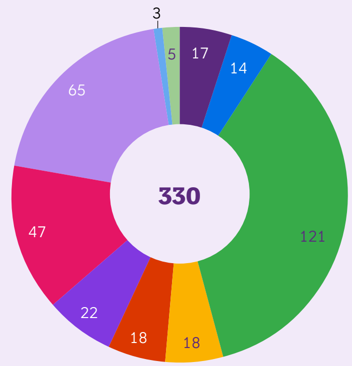
– Armed PSCs operating in high-risk countries that have not signed up to the International Code of Conduct (ICoC) or other relevant industry body within the next 12 months.

– Armed PSCs operating in low-risk countries that have not adopted ICoC or equivalent standards, policies or procedures.

– PSCs providing armed personnel to government Armed Forces or local militia (mercenaries).

For further information refer to ESE risk framework and our ESG downloads and policies repository for the most up to date Defence and Private Security Sector ESE RAC at natwestgroup.com.

Customers assessed in 2024 by sector



- Adult entertainment: 17
- Animal welfare: 14
- Defence: 121
- Forestry, fisheries and agribusiness: 18
- Generic: 18
- Mining and metals: 22
- Oil and gas: 47
- Power generation: 65
- Private security companies: 3
- Gambling: 5

In 2024 we undertook 330 customer ESE assessments (2023: 520). Of these, 121 related to the Defence sector (2023: 190) and 71 were trade-related transactions involving defence equipment (2023: 79). The reduction in cases reflects the review cycle.

(1) A violation of any right which is inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion or any other status.

(2) A finding of a human rights violation by a government (including a government agency), supervisory authority, national or international court or multinational development agency.

CASE STUDY

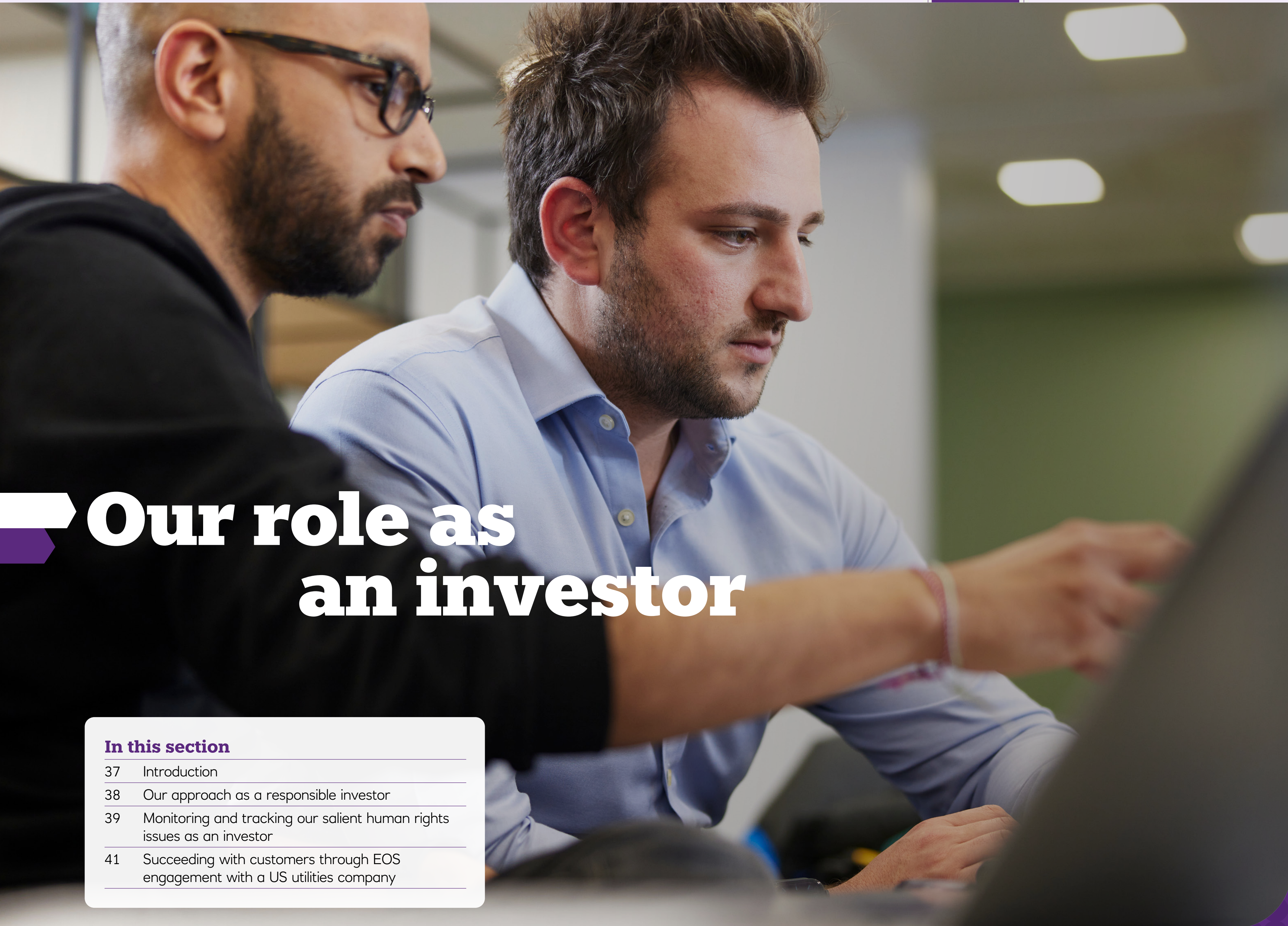
Succeeding with customers through innovation

Supporting an energy efficient affordable housing sector

In 2024, Together Housing Group (THG) announced a significant investment in sustainable upgrades to its portfolio of more than 38,000 properties across Yorkshire, Lancashire and the North Midlands thanks to a £50 million funding boost from NatWest Group.

THG is the first affordable housing association to secure funding through our new Green Housing Retrofit Loan pilot scheme. The deal marked the first successful completion of a use of proceeds loan in the UK affordable housing sector by any UK bank. Aligned with LMA Green Loan Principles, the loan enabled THG to support installation of ground and air source heat pumps, alongside delivering retrofit improvements such as replacing cladding, roofs and windows to improve thermal and energy efficiency across its network of socially rented properties, spanning 30 local authorities. Working in partnership with NatWest's ESG Advisory team to confirm the efficiency ratings of the planned upgrades, the investment allows customers to benefit from a significant reduction in energy bills while lowering THG's emissions across their property portfolio.

Mark Dunford, Executive Director of Finance and Commercial at Together Housing Group, added: 'We're proud of the progressive steps we've taken so far towards achieving our ambitious net-zero priorities and we are thrilled to be the first social housing association to receive this valuable funding. Our carbon reduction strategy puts residents at the forefront as we strive to make essential retrofit adaptations to properties, ensuring they remain energy efficient for the benefit of current and future residents.'



Our role as an investor

In this section

Introduction

Our Investment Products and Solutions (IP&S) business, part of Coutts & Co, strives to cater to the investment needs of our customers by providing tailored products and services for NatWest Group customers. In this chapter, references to 'IP&S', 'we', 'our', or 'us' pertain to the assets under management (AUM) of IP&S and may encompass activities conducted on behalf of our customers by third parties, such as EOS at Federated Hermes (EOS), unless specified otherwise.

Our salient human rights assessment, focusing on our role as an investor, evaluated the severity and likelihood of potential issues across our investment portfolio. Consequently, we identified five salient human rights issues pertinent to our investor role:

- Data protection and privacy
- Labour rights issues and unjust working conditions
- Contribution to climate change
- Land rights
- Conflict and security

Managing salient human rights as an investor

To manage these inherent risks and mitigate our potential link to human rights harm, we have established several policies and measures for our investor role:

- Our responsible investment policies
- UN Global Compact member (as part of NatWest Group)
- Principles for Responsible Investment (PRI) signatory

For further information refer to Responsible investments on coutts.com.

Following the publication of our salient human rights issues we:

- Continued working with Federated Hermes EOS (EOS), a global engagement and stewardship service that focuses on promoting responsible investment practices, including social issues, to monitor voting and engagement management information, including the total number of votes cast.
- Continued to assess fund managers' consideration of ESG factors, including human rights, in their investment process and ownership practices through our responsible investing assessment.

Areas of future focus:

- We will continue to consider human rights as part of our investment approach.

Our approach as a responsible investor

We apply our responsible investing approach to those Funds and Discretionary Portfolios that we have discretion to manage on our customers' behalf, which we refer to as Managed Assets.

Investment selection

Once a potential investment is identified, our responsible investing assessment is carried out.[1] The outcomes of the assessment and supporting commentary are included as one of several factors in the recommendation for investment. The responsible investing assessment's purpose is to gain an understanding of fund managers' consideration of ESG factors, including human rights, in their investment process and ownership practices.

Voting and engagement

EOS at Federated Hermes (EOS)[2] provides voting recommendations and engages directly with companies held by our custom-built funds. In 2024, social issues made up 26% of the total engagements.

In 2024, EOS engaged on:

562 human and labour rights and human capital issues (2023: 511) and objectives across 262 companies (2023: 230).

(1) The responsible investing assessment is carried out on all funds at onboarding.

(2) EOS at Federated Hermes is a global engagement and stewardship service that focuses on promoting responsible investment practices. It is a part of Federated Hermes, an investment management firm, and its primary aim is to influence companies to adopt sustainable business practices by engaging with them on environmental, social, and governance (ESG) issues.

Exclusions

There are certain investments where we consider engagement unlikely to be effective. As a result, these are excluded from our custom-built funds subject to revenue or criteria thresholds. We have four exclusion categories (shown below) and human rights is captured within 'global norms violations'.

Limitations of our ESG-related exclusions approach

It is important to recognise that the exclusions only apply to our custom-built funds. We do not define the investment parameters or ESG policies of third-party funds.

Therefore, the impact of exclusions can vary over time and will typically reduce, rather than remove exposure to the exclusions categories.

For further information refer to ESG disclosures and policies and Supporting global initiatives at coutts.com.

Overview of exclusions categories

Exclusion Theme	Related Exclusions	Exclusion Approach
Fossil fuel-related	Thermal coal, tar sands, arctic and unconventional oil and gas production	Revenue threshold
Other societal-based	Adult entertainment, civilian firearms, gambling, predatory lending, tobacco	Revenue threshold
Weapons	Controversial weapons, nuclear weapons	Criteria
Global norms violations	United Nations Global Compact, human rights, International Labour Standards	Criteria

Monitoring and tracking our salient issues as an investor

Data protection and privacy

We recognise that company activities related to digital and privacy rights could have negative impacts on society.

EOS engagement approach

On our customers' behalf, EOS engage in the protection of digital rights in the virtual world, such as challenges to the right to data privacy, the right to freedom of expression and protection from unfair biases.

EOS plan to continue to engage companies on our Digital Rights Principles, which outline the responsible development and deployment of AI. EOS plan to update these in 2025 to encompass the latest concerns, issues and opportunities. EOS engages companies on negative societal impacts, including problematic content in social media, reinforcement of unintended bias, and health and safety impacts on children and young people.

In 2024, EOS engaged on:

98 digital rights and cyber security issues (2023: 62) and objectives across 63 companies (2023: 39).

Labour rights and unjust working conditions

We recognise that company activities could have negative impacts on labour rights, such as unjust working conditions.

Our ESG-related exclusions

We have global norms violations exclusion criteria relating to international labour standards in place for our custom-built funds.

EOS engagement approach

We encourage companies to consider the possibility that human and labour rights impacts are present within some operations and supply chains and to demonstrate appropriate board and executive-level governance. EOS will also continue their emphasis on supply chain rights with an elevated risk of forced labour, unsafe working conditions, and other adverse human rights impacts.

Land rights

We recognise that company activities could have negative impacts on land rights.

EOS engagement approach

The engagement theme of Human and Labour Rights includes the protection of indigenous and community rights.

We urge companies to respect the rights of all communities impacted by their operations, while recognising the unique considerations specific to Indigenous Peoples, such as the concept of Free, Prior and Informed Consent (FPIC).

In their engagements, EOS encourage companies to adopt a policy commitment to indigenous peoples' rights, separate from or included in their human rights policy, which includes support for the UN Declaration on the Rights of Indigenous Peoples (UNDRIP).

The 2025-27 EOS engagement plan will continue a focus on protecting indigenous and community rights in high-risk regions.

Conflict and security

We recognise that company activities could have negative impacts on national security, such as contributing to social conflict.

Our ESG-related exclusions

Controversial weapons and nuclear weapons exclusion criteria are in place for our custom-built funds.

EOS engagement approach

The EOS engagement theme of human and labour rights include a focus on high-risk regions such as disputed territories or areas of conflict.

For further information refer to the ESG disclosures and policies at coutts.com and the 2024 Annual review Coutts & Co. engagement highlights.

Contribution to climate change

We recognise that company activities could have negative impacts on climate change and related human rights impacts.

Investment approach to net zero

According to the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report[(1)] climate change is increasing the volume and severity of weather events like droughts, floods, and storms. Therefore we consider climate-related risks and opportunities to be material to the investments we manage on our customers' behalf.

We continue to integrate climate considerations into our business strategy and investment process, guided by our investment philosophy, while seeking to align to our customers' investment objectives.

Investment selection

We believe that funds acting on climate change could generate long-term sustainable returns provided that they are actively managing climate-related risks and acting on climate-related opportunities.

Once a potential investment is identified, our responsible investing and net-zero assessments are carried out. These are integrated into our investment selection process as summarised below.

Collective initiatives

We are signatories to investor-led initiatives that support the transition to a net-zero economy. These include Climate Action 100+ and the Net Zero Assest Mangers initiative (NZAM). As a signatory we engage by aligning with the goals and commitments set by these collective initiatives.

Portfolio alignment

Portfolio alignment measures the percentage of Managed Assets invested in direct government bonds and funds[(2)] that are on a net-zero pathway. The assessment criteria are based on the Paris Aligned Investment Initiative (PAII) net-zero investment framework and are integrated into the investment decision-making process.

58% of our Managed Assets were considered portfolio aligned as at 31 December 2024 (2023: 49%)

Our ESG-related exclusions

We have fossil fuel related exclusion criteria in place for our custom-built funds.

EOS engagement approach

If companies transition to a low-carbon economy, we expect them to consider the impact on human and labour rights within the company and in the surrounding value chain.

In 2024, EOS engaged on:

650 climate change issues and objectives (2023: 473) across 289 (2023: 234) companies.

For further information refer to Responsible investing and Assets Under Management (AUM) climate transition plan in the 2024 NatWest Group Sustainability Report and our Climate-related disclosures in the 2024 Annual Report and Accounts.

Integrating responsible investing into investment decision-making

Assessment categories[(3)]
- 2050 net-zero and short-term goals
- Transition plan and progress
- Integration into investment decision-making
- Voting and engagement
- Exclusions policies
- Disclosures and reporting

Investment identification and assessment

Responsible investing and net-zero assessment completed

↓

Responsible investing and net-zero score generated

Investment selection

Scores and commentary included in recommendation for investment

↓

Implementation analysis against minimum portfolio alignment thresholds completed

Investment monitoring and reporting

Investments are monitored for material changes

↓

Reporting to management, executive, board committees and customers

(1) IPCC 6th Assessment Report.
(2) Approach to those Funds and Discretionary Portfolios that we have discretion to manage on our customers' behalf, which we refer to as Managed Assets.
(3) Summary of the assessment categories covered by the responsible investing assessment and net-zero assessment.

CASE STUDY

Succeeding with customers through EOS engagement with a US utilities company

Stages of EOS engagement

Example activity in our custom-built funds

1. **Background to engagement (2016-2019):**
EOS commenced discussions with the Company regarding infrastructure updates and health and safety performance following wildfires in the region.

2. **Steps taken (2022-2023):**
In 2022 and 2023, EOS engaged with the Company to address human rights risk management and board oversight, also recommending the Company join the UN Global Compact and improve disclosure practices through the Task Force on Climate-related Financial Disclosures.

3. **Outcomes of Engagement (2022):**
The Company completed a cultural review and integrated its human rights policy into various organisational strategies and developed new technology for risk management.

4. **Progress (2023):**
The Company's ratings with international agencies were upgraded, indicating progress in its safety and compliance measures.

Approval

This report was drafted and developed by our Sustainable Banking Team with input from the five role areas of: employer, procurer, retail banker, commercial banker and investor.

It was reviewed by the Human Rights Action Group, noted at our Executive Committee and it was approved by the Board of NatWest Group plc and signed by Paul Thwaite, Group Chief Executive and Rick Haythornthwaite, Group Chair.

Paul Thwaite
Group Chief Executive,
NatWest Group plc

10 June 2025

Rick Haythornthwaite
Group Chair,
NatWest Group plc

10 June 2025

Appendix

In this section

NatWest Group's approach to human rights is guided by the UN Guiding Principles (UNGPs). This is our first time reporting our alignment with reference to the UN Guiding Principles Reporting Framework[1] and guidance. Our responses to the questions, which are not subject to assurance, are noted below by signposting to the relevant information within this report. We recognise the gaps and strive for greater alignment in the future.

Part A – Governance of Respect of Human Rights			Pages where addressed
A1 – Policy commitment	What does the company say publicly about its commitment to respect human rights?		1, 2
	A1.1	How has the public commitment developed?	1
	A1.2	What human rights does the public commitment address?	1
	A1.3	How is the public commitment disseminated?	1, 2
A2 – Embedding respect for human rights	How does the company demonstrate the importance it attaches to the implementation of its human rights commitment?		3
	A2.1	How is day-to-day responsibility for human rights performance organized within the company, and why?	3
	A2.2	What kinds of human rights issues are discussed by senior management and by the Board, and why?	3
	A2.3	How are employees and contract workers made aware of the ways in which respect for human rights should inform their decisions and actions?	4, 8
	A2.4	How does the company make clear in its business relationships the importance it places on respect for human rights?	1, 4, 9, 10
	A2.5	What lessons has the company learned during the reporting period about achieving respect for human rights, and what has changed as a result?	7,12,16,18,21,23,28,37,41
Part B – Defining the focus of reporting			
B1 – Statement of salient issues	State the salient human rights issues associated with the company's activities and business relationships during the reporting period.		9, 10
B2 – Determination of salient issues	Describe how the salient human rights issues were determined, including any input from stakeholders.		9
B3 – Choice of focal geographies	If reporting on the salient human rights issues focuses on particular geographies, explain how that choice was made.		9
B4 – Additional severe impacts	Identify any severe impacts on human rights that occurred or were still being addressed during the reporting period, but which fall outside of the salient human rights issues, and explain how they have been addressed.		
Part C – Management of salient human rights issues			
C1 – Specific policies	Does the company have any specific policies that address its salient human rights issues and, if so, what are they?		4, 12, 18, 23, 28, 37
	C1.1	How does the company make clear the relevance and significance of such policies to those who need to implement them?	6, 8, 15, 21, 25
C2 – Stakeholder engagement	What is the company's approach to engagement with stakeholders in relation to each salient human rights issue?		6, 7, 9, 21, 25, 29,41
	C2.1	How does the company identify which stakeholders to engage with in relation to each salient issue, and when and how to do so?	1, 7, 9
	C2.2	During the reporting period, which stakeholders has the company engaged with regarding each salient issue, and why?	6,7,41
	C2.3	During the reporting period, how have the views of stakeholders influenced the company's understanding of each salient issue and/or its approach to addressing it?	6, 7

(1) UN Guiding Principles Reporting Framework can be found here.

C – Management of salient human rights issues			Pages where addressed
C3 – Assessing impacts	How does the company identify any changes in the nature of each salient human rights issue over time?		
	C3.1	During the reporting period, were there any notable trends or patterns in impacts related to a salient issue and, if so, what were they?	
	C3.2	During the reporting period, did any severe impacts occur that were related to a salient issue and, if so, what were they?	
C4 – Integrating findings and taking action	How does the company integrate its findings about each salient human rights issue into its decision-making processes and actions?		
	C4.1	How are those parts of the company whose decisions and actions can affect the management of salient issues, involved in finding and implementing solutions?	3
	C4.2	When tensions arise between the prevention or mitigation of impacts related to a salient issue and other business objectives, how are these tensions addressed?	
	C4.3	During the reporting period, what action has the company taken to prevent or mitigate potential impacts related to each salient issue?	12, 18, 23, 28, 37
C5 – Tracking performance	How does the company know if its efforts to address each salient human rights issue are effective in practice?		29, 41
	C5.1	What specific examples from the reporting period illustrate whether each salient issue is being managed effectively?	12, 18, 23, 28, 37
C6 – Remediation	How does the company enable effective remedy if people are harmed by its actions or decisions in relation to a salient human rights issue?		
	C6.1	Through what means can the company receive complaints or concerns related to each salient issue?	5
	C6.2	How does the company know if people feel able and empowered to raise complaints or concerns?	5, 8, 15
	C6.3	How does the company process complaints and assess the effectiveness of outcomes?	15, 20, 21, 24
	C6.4	During the reporting period, what were the trends and patterns in complaints or concerns and their outcomes regarding each salient issue, and what lessons has the company learned?	
	C6.5	During the reporting period, did the company provide or enable remedy for any actual impacts related to a salient issue and, if so, what are typical or significant examples?	

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NatWest Group

NatWest Group plc

Human Rights Report

NatWest Group plc
36 St Andrew Square
Edinburgh, EH2 2YB

www.natwestgroup.com