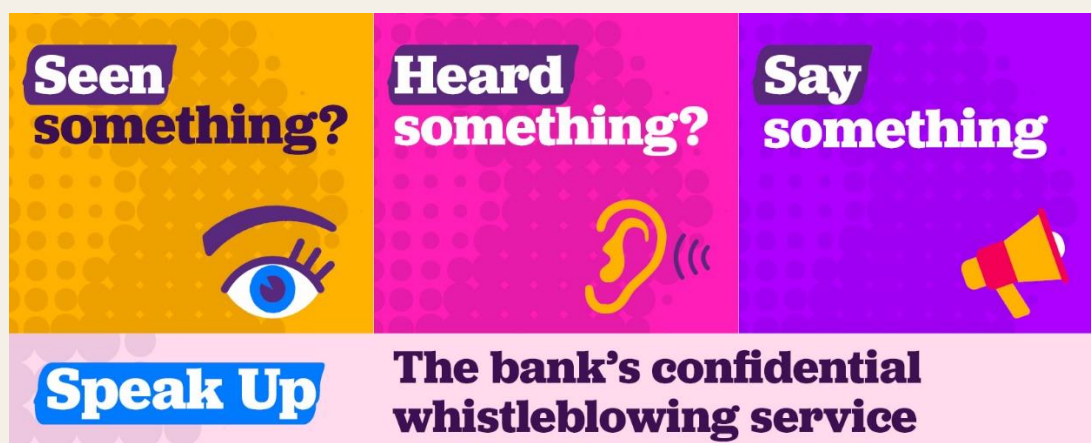




NatWest
Group

Whistleblowing & Speak Up Guidance



Whistleblowing & Speak Up Guidance	1
Overview of the Speak Up Framework.....	3
Introduction.....	3
What is whistleblowing?	3
Why is whistleblowing so important?	4
What is Speak Up?.....	4
Who can use Speak Up?	4
Why should I use Speak Up?	4
Does NatWest Group really want me to report my concerns?	5
What can be reported using Speak Up?	5
What types of concerns are not covered?.....	5
Methods for raising concerns	7
Line Management.....	7
Speak Up.....	7
Externally	7
The Speak Up & Investigation Process.....	8
How will I, as a reporter, be kept informed of progress?	10
Line Managers: What to do when someone raises a concern with you	11
Line Managers: How to raise a concern on behalf of someone else	12
Can I see a copy of my original report?	13
Can I provide further information or an update to my submitted report?	13
Will anyone be able to identify me?	14
What happens once an investigation has been completed?	15
Is there any form of protection in place for whistleblowers?	15
Line Managers: How to help protect the reporter	16
What if I am a witness or the subject of a Speak Up investigation?	16
Line Managers: What do I need to consider for those named in a Speak Up report, either as a subject or a witness?.....	17
Further Information.....	19
Appendix 1 – UK Definitions	20
The Legal Definition.....	20
The Regulatory Definition	20

Overview of the Speak Up Framework

Introduction

Speaking up is valued at NatWest Group (NatWest). It is a vital component of a healthy culture and key to being a Purpose-led organisation. We want everyone to feel confident to raise any concerns they have about wrongdoing or misconduct without fear of retaliation.

‘Speak Up’ is the bank's whistleblowing service, enabling individuals to raise concerns in confidence (and anonymously if preferred) and operates across NatWest, covering all legal entities, functions, and franchises.

The Enterprise Wide Risk Management Framework (EWRMF) sets out our approach to taking and managing risk. Intelligent risk taking is central to maintaining a culture based on strong ethical standards, balanced judgement, and the desire to keep the bank and its customers safe, and where colleagues feel safe to challenge each other's attitudes, ideas and actions.

We all have a responsibility to speak up if something is wrong and will affect NatWest, its customers, employees, shareholders, or the public. This includes behaviour which is not in line with our code of conduct (Our Code), breaches our internal policies and procedures, breaches regulatory requirements or is illegal. Anyone raising a concern is acting in accordance with NatWest values.

The Speak Up policy is purposely broad, covering anyone who acquires information about wrongdoing through work related activity, during recruitment, or as part of any pre-contractual negotiations. It covers all employees and those acting on behalf of or representing NatWest such as contractors, subcontractors, suppliers, temporary staff, secondees, consultants, interns, and volunteers. This also includes any persons formerly in these roles.

NatWest treats whistleblowing seriously. We know that it can have a profound impact on those involved, both for the individual raising the concern and anyone who is accused of wrongdoing or misconduct.

This guidance will provide you with a better understanding of:

- What whistleblowing is and why it's important,
- What the Speak Up service is and who can use it,
- What type of concerns can be reported using Speak Up and when,
- How to raise concerns,
- Reporting confidentially vs anonymously,
- The end-to-end Speak Up process, including what will happen at each stage of the journey,
- Where to go for further information.

What is whistleblowing?

‘Whistleblowing’ is the term used when concerns are raised regarding suspected or known wrongdoing by an organisation or its employees. It is also known as ‘making a disclosure’.

The NatWest definition of whistleblowing is contained in the Speak Up policy. It incorporates legal and regulatory definitions of whistleblowing (see *Appendix 1 for UK Definitions*) to ensure that all instances of wrongdoing relating to conduct or behaviour are included.

Why is whistleblowing so important?

Inappropriate conduct can impact our customers, shareholders and can seriously damage our business reputationally, operationally and financially. It can also have a profound impact on our personal lives. As such, we need a safe, secure, and robust process in place to allow individuals to report any wrongdoing or misconduct. Having a whistleblowing service helps to create a safer, stronger business where colleagues feel safe and empowered to raise their concerns.

All colleagues are expected to behave in accordance with our code of conduct - Our Code - and there are several internal tools and resources in place to help guide behaviours and decision making. These include:

- Our Purpose and Values,
- YES check,
- Critical People Capability Behaviours,
- Senior Manager and Certification Regime,
- Our Policies and Procedures.

When we act with integrity and take risks intelligently, our customers trust and value us, and our colleagues take pride in working for NatWest. The whistleblowing framework is an important part of our journey to improving our culture and being purpose led.

What is Speak Up?

‘Speak Up’ is the name of the bank’s whistleblowing service. It enables colleagues to confidentially, or anonymously, raise concerns relating to wrongdoing or misconduct so that they can be investigated. The reporting service is operated by an independent third party called NAVEX Global Inc (Navex) on behalf of NatWest.

Who can use Speak Up?

The Speak Up service is open to anyone who acquires information about wrongdoing through work related activity, during recruitment, or as part of any pre-contractual negotiations. Our Speak Up policy covers all employees and those acting on behalf of, or representing NatWest, such as contractors, subcontractors, suppliers, temporary staff, secondees, consultants, interns, and volunteers. This also includes any persons formerly in these roles.

Recruiting managers are responsible for making sure that any contract workers or consultants, even if they’re working for us for a short period or specific project, are aware of the Speak Up policy and have completed any mandatory training.

Why should I use Speak Up?

We all have a responsibility to speak up about wrongdoing or misconduct in the workplace so if you observe employee wrongdoing or misconduct within NatWest, we expect you to report it. Speaking up is part of our culture. The Speak Up service is there to enable you to raise any concerns about wrongdoing or misconduct in a safe and secure manner, which will help us create a robust and sustainable long-term future.

You can talk to your line management in the first instance if you have a concern. They will often be able to address your concerns, with the support of HR Policy and Advice where appropriate. They will also be able to provide you with support and guidance if they cannot address the concern themselves. In some instances, this will include other issues which may benefit from being investigated by one of the bank’s dedicated investigation teams:

- Conduct Analysis & Resolution – predominantly focused on Retail Banking concerns; and
- Litigation & Investigations.

Does NatWest Group really want me to report my concerns?

Yes. In fact, we *need* you to report any concerns you have about misconduct or wrongdoing in the workplace. As an employee or someone acting on behalf of or representing NatWest, you know what is going on day to day in our bank - both good and bad. You may have initial knowledge of an activity that may be cause for concern. By raising your concerns, you can help to minimize any potential negative impact of wrongdoing or misconduct on the company and our people. Feeling able to raise concerns can also have the effect of improving culture and performance.

What can be reported using Speak Up?

There is no definitive list of what can be reported via Speak Up. We want to know about concerns that individuals have about wrongdoing or misconduct that affects NatWest, its customers, employees, shareholders, or the public.

Below are some examples of what can be reported through Speak Up, as documented in the Speak Up Policy:

- Conduct and behaviour that falls short of Our Code, including sexual harassment or discrimination;
- Criminal activity including authorisation breaches, theft, or involvement in the facilitation of slavery;
- Breaches of NatWest policies, procedures, or customer treatment standards (such as mis-selling);
- Manipulation of sales and service processes;
- Breaches of regulatory or legal requirements (such as financial services regulators' rules and regulations, data protection law and competition law);
- Breaches of financial accounting and auditing obligations;
- Colleagues dealing inappropriately with their own accounts or the accounts of others;
- Behaviour that harms the reputation or financial well-being of NatWest;
- Other risks or dangers at work (such as breaches of IT security);
- Whistleblowing breach or process issue including whistleblower detriment; and
- Any attempt to conceal any of the above points.

You do not need to have proof that the activity being reported has been, is being or is likely to be committed. Financial loss does not need to have taken place, and the country in which the activity took place is irrelevant. To assist in any investigation into the concerns raised, Investigators may request specific account or appointment details.

While issues can appear minor at the outset, they can lead to more serious concerns that need to be investigated. All reported concerns are taken seriously and investigated in a proportionate and appropriate manner.

What types of concerns are not covered?

Depending on the nature of the concern, it may be that there is a more appropriate, existing process in place for some issues to be raised. For example:

- **Personal grievances** – there are processes in place for addressing colleagues' concerns that relate to them personally, which may be more appropriately managed and supported by HR. These include:
 - **Resolving Issues at Work (RIAW) Process:** if you have personal issues relating to your employment (for example you think you are being bullied) - follow the HR RIAW

process. The **Disciplinary Process** is used to support line managers in addressing concerns about colleague conduct.

- **Mediation:** When you have an issue with someone at work, usually this can be resolved by discussing the issue with the person involved. If you feel this is something you are unable to do on your own, you might consider accessing Mediation services where a trained mediator can support the conversation to try to help both parties to come to a resolution. This can often help to resolve issues quickly and limit any impact it may have on staff wellbeing and relationships at work. More information about Mediation is available on the intranet: **HR > Working Here > Mediation.**
- **Performance Rating Appeal:** if you are dissatisfied with your end of year rating - refer to your line manager regarding the Performance Ratings Appeal process.
- **Redundancy Appeals Process:** if you are dissatisfied with the redundancy process - follow the HR Redundancy Appeal process. *(Not applicable in India)*
- **Customer complaints** – refer to your local complaints team or visit the ‘How to Complain’ pages of the NatWest Group website at: <https://www.natwestgroup.com/who-we-are/contact-us/how-to-complain.html>
- **Money Laundering** – if you have suspicions that transactions may be linked to money laundering, raise an Internal Money Laundering Suspicion Report (IMLSR). If, however your concerns relate to financial crime policies or process, these may be raised through the Speak Up service.
- **External Recruitment** – contact the NatWest Recruitment Team via <https://jobs.natwestgroup.com/pages/application-support>.

These processes should be used in the first instance. If you have exhausted the alternative process and have concerns in relation to its effectiveness or efficiency, this can be reported through Speak Up. However, any investigation into such concerns would be focused on the overall process rather than any personal / individual cases.

Where you are unsure whether your concerns would be best addressed through Speak Up or otherwise, please contact the internal Speak Up Team for advice by emailing: SpeakUpGuidanceSupport@natwest.com. All contact is treated confidentially.

You can also contact Protect, an independent whistleblowing charity who can provide extra support and guidance: <https://protect-advice.org.uk/>.

Methods for raising concerns

There are different ways to raise your concerns depending on the issue. For concerns regarding employee wrongdoing and misconduct, details of the most common reporting routes can be found below.

Line Management

We would hope that in the first instance you feel able to raise your concerns with a colleague or line management if you are comfortable discussing your concerns with them. Your line manager can provide support and help with any questions you have.

Depending on who or what your concerns relate to (for example another direct report of your line manager or a customer complaint), your line manager may be able to address or escalate your concerns using one of the alternative processes such as customer complaints, personal grievance, or the disciplinary process.

Where managers can address the concerns, these are resolved locally, following HR policies and usually with support from HR Policy & Advice. However, if you do not feel comfortable with this option, or line management are not able to resolve your concerns locally, there are other options available.

Speak Up

Speak Up is available to individuals to report concerns regarding misconduct or wrongdoing. Speak Up is a confidential, 24/7 telephone and online reporting service operated on behalf of NatWest by a third-party supplier, Navex. Reports can be made confidentially, and anonymously if preferred. You will be asked to provide as much information as you can about your concerns when raising a new report.

Reports can also be made directly to the Speak Up team via email or letter. Alternatively, a physical meeting can be arranged upon request.

The most efficient way to raise your concerns is online and we would always encourage individuals to report their concerns directly through Speak Up as this can improve the accuracy of reports and ensure there are no delays in an investigation being started.

To raise a concern through Speak Up, please visit <https://natwestgroup.ethicspoint.com> or the Speak Up intranet page: **NatWest Group Intranet > Useful Sites> Policies > Speak Up**

Externally

Whilst we encourage you to raise issues internally, you can report your concerns directly to the Financial Conduct Authority (<https://www.fca.org.uk/firms/whistleblowing>) and the Prudential Regulation Authority (<https://www.bankofengland.co.uk/prudential-regulation/whistleblowing-and-the-pra>) in the UK, your local country regulator or designated competent authorities in the European Union.

Reporting to your local regulator is not conditional on first reporting your concerns internally. There's no requirement for you to raise your concerns internally before, during or after contacting the regulator.

For further details of external bodies who accept whistleblowing reports please refer to the [‘About’ page of the Speak Up reporting site](#).

The Speak Up & Investigation Process

Whether you choose to report online or by phone, both methods of reporting involve gathering as much information as possible from you. Please have this to hand before taking the time to submit your report. The more specific the information or examples you provide, the better able the bank will be to investigate the matters you've raised in a timely and effective manner.

There are 4 high level steps to the whistleblowing journey, as summarised below.

Step 1: You submit a report using the Speak Up online portal or phone line

This is a safe and secure way to make a report and you can find the link to the Speak Up reporting portal on the Speak Up intranet page. The most efficient way to report your concerns is online. You don't need to be in the office to raise a report.

It's a very straightforward process and how long it takes depends on how much information you have to share - the more you provide, the easier it will be to investigate. You'll be asked to give information about your concerns, or the concerns that you're raising on behalf of a colleague.

It's up to you if you want to disclose your identity or remain anonymous.

If you're reporting on behalf of someone else, it's important you check with them so they can decide if you should disclose their details within your report.

All reports are treated confidentially.

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

If you decide to remain anonymous, it could limit the extent and scope of any investigation as we may be unable to gather further information from you about your concerns. We will also be unable to engage with you by telephone or email, therefore you will need to regularly log in via the Speak Up (Navex) reporting channels to receive or provide updates to or from the investigator, including any feedback on progress.

We'll also ask you to select a preferred method of communication. You can choose for all contact to be through the secure Speak Up portal, or directly via phone or email.

When submitting your report, focus on the 5 W's - **who, where, when, what and why**. You can also upload files to support your concerns. If you're reporting concerns on behalf of another colleague, you'll need to gather the information from them before reporting.

- **Who** do you think is/was involved in the issue? Who else knows about this incident? If applicable, who have you reported this incident to and what actions, if any, have been

taken as a result? Use full names when describing people rather than using he/she/they, him/her/them.

- **Where** did the activity or incident take place?
- **When** did the issues occur? When did you learn about the incident? Is this issue ongoing? Has it happened before? Do you know any potential frequency or dates of the previous incidents?
- **What** is happening in your own words? What issue(s) are you concerned about? Take your time and provide as much detail as possible. Try to include dates, times, people and places.
- **Why** do you think this incident happened?

We'll also ask:

- Do you think anyone's tried to conceal this incident? If so, who and how they have tried to conceal it?
- Can you think of any other information that could be valuable in the evaluation and ultimate resolution of this situation?

Complete a feedback survey

This helps to improve our processes, procedures, and systems, ensuring the service meets reporters' requirements.

Create a password so you can come back later to: view and check your report, or any subsequent disclosures, for accuracy and completeness; respond to updates from the investigator; give more information; and receive closure feedback on the outcome of the investigation.

Lastly, we'll give you a Report Key, which is like a username. Record your Report Key and password and store them securely as you can't access your report without these details. If you forget or misplace either or both of these, you'll need to submit a new report to provide any further information or find out the outcome of the investigation.

Please make sure you save your username and password.

Step 2 – The bank's internal Speak Up team assess the information

This is completed in accordance with our Speak Up policy. The team consider all of the concerns and, where appropriate, will allocate an investigator to examine the issues raised to establish the underlying facts. They also consider if there are any aspects that need special consideration or additional oversight.

The team are regularly trained, and conflicts of interest controls are in place to make sure your identity is protected, and your concerns are managed appropriately.

Step 3A – 'Qualifying' concerns are passed to Investigations

You'll be contacted within five working days from the date of reporting to tell you what happens next via your preferred method of contact.

An investigation will be carried out. Throughout the investigation, you may be asked for more information and will be contacted by way of a “Follow Up” message through the Speak Up portal or directly via your preferred method of contact so if you’re anonymous or have asked to be kept updated through the Speak Up service, please do check back regularly. If our investigation takes longer than 90 days, we will provide a more substantive update at that point to tell you what we’ve done so far and what we still need to do before reaching a conclusion.

When the investigation concludes, you’ll be given high level details of the outcome - subject to confidentiality. It’s not always appropriate for the investigator to provide detailed feedback, but they’ll share as much information as possible to assure you that your concerns have been taken seriously and independently investigated.

Appropriate action will be taken to address any issues identified. This could result in several outcomes including a change of process, training, communications or disciplinary action against the subject of the allegations.

OR

Step 3B – An alternative route is identified to manage “non-qualifying” concerns

That includes any of these types of concerns:

- Personal issues or grievances relating to your employment - you can discuss these with your line manager or contact HR to discuss the most relevant process to follow.
- Customer complaints - you should refer these to the relevant complaints team.
- Property related issues such as faulty equipment or access to buildings - contact the Workplace Service Centre.
- Suspicions of money laundering - raise an Internal Money Laundering Suspicion Report.
- Support with any problem at work or in your home life which impacts on your wellbeing - contact the Employee Assistance Programme where this is available. This is a free, confidential helpline and online support service provided by a third party.

The Speak Up Team will contact you within 5 working days from the date of reporting to advise you of the most appropriate route to progress your concerns. If you’ve already exhausted the alternative process and have concerns in relation to its effectiveness or efficiency, this can be reported through Speak Up. However, any investigation into these types of concerns would be focused on the overall process rather than any personal or individual cases

Step 4 – Closure review

The Speak Up Team review every report before it’s closed to make sure it’s been managed in line with the Speak Up policy and procedures.

How will I, as a reporter, be kept informed of progress?

- Your concerns will be **acknowledged within 5 working days** of receipt by the Speak Up team. If you decide to remain anonymous, it is important that you keep in contact with us through the Speak Up online portal or by phone, using your Report Key and password. This will enable you to receive feedback and provide further information if required.
- Without your engagement it can make it more difficult for us to investigate the matters you have reported and may limit the scope and extent of our investigation.

- If you have chosen to provide your name, contact details and preferred method of contact, the Speak Up team or investigation teams **may engage with you directly** rather than through the Speak Up portal.
- If you've raised a concern through a colleague, the colleague may ask for further information on the investigator's behalf or be able to provide you with updates where appropriate.
- In some circumstances you may choose or be asked to meet the investigator, either virtually or face to face, to discuss your concerns further. This isn't always necessary and doesn't always happen. If a meeting is required, it can be arranged at a convenient time and location. The investigator may also ask one of their colleagues to take notes, which you will have an opportunity to review and approve.
- Please bear in mind that only the information you provide, and anything that comes to light during the investigation can be acted upon. **The more information you can provide initially, the more likely it is that the investigation will be effective and efficient.** Please be as open and honest as possible.
- Conducting a fair investigation **takes time**. You will be engaged during the investigation where appropriate. You will receive an acknowledgement of receipt of your concerns, regular updates on progress, with a more substantial update on progress at 90 days, and a closure message. The closure message lets you know that the investigation has concluded, the high-level outcome, and any action taken to address findings (where appropriate).
- **We will share as much information as we can** with you following an investigation, subject to confidentiality requirements.

Line Managers: What to do when someone raises a concern with you

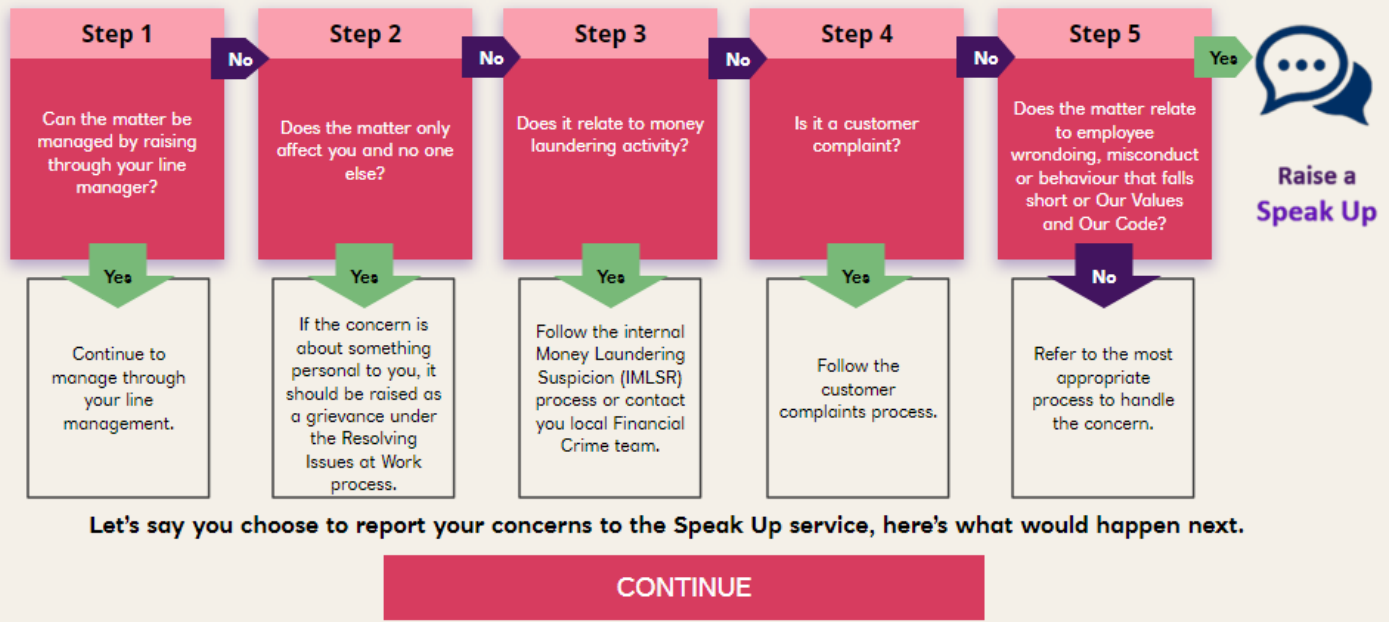
An employee may raise a concern directly with you, and in some circumstances, you may be able to manage the issue as part of your normal role as their line manager, perhaps with the support of HR Policy & Advice. For example, if it relates to another team member's performance and in some cases, their behaviour or conduct. Speak Up is not there to replace that. That's why it's important that you can understand and recognise when someone reports a whistleblowing concern to you.

This could happen formally at work or informally, for example at a team social event. It's important to understand that an employee may whistleblow unknowingly. That means that they may raise a concern in conversation without knowing that this is what they are doing.

When an employee raises a concern with you, the first thing to do would be to understand whether the concern qualifies as a whistleblowing 'disclosure' – or whether it is a matter which should be dealt with through an alternative channel such as customer complaints, personal grievance, or the disciplinary process. Focussing on the 'substance' of the concern will help you determine the most appropriate way to handle it.

The diagram below is designed to help provide guidance on this very point and is contained within the Speak Up GPL e-learning module which every employee and line manager completes.

Raising your concerns via Speak Up



Key points to mention are as follows:

- If the concern is about something personal to an individual employee, then it should be raised through the **HR processes such as Grievance, Performance Rating Appeal** etc.
- If the concern has been raised directly by a customer and relates to them personally, this should be treated as a **customer complaint**.
- If the concern relates to suspicious transactions on a customer's account which may be linked to money laundering, the individual should raise an **Internal Money Laundering Suspicion Report (IMLSR)**.

There may be times when a concern contains elements that are **both personal to the employee and elements that should be reported via Speak Up for investigation**. If this is the case, you should encourage the employee to report their relevant qualifying concerns through the Speak Up process and the relevant personal issues via the Resolving Issues at Work process to ensure that all elements are investigated appropriately.

This will often involve a combination of HR engagement alongside involvement from one of the bank's investigation teams, which will be coordinated by the Speak Up team.

If an employee reports a concern directly to you, **you should encourage them to raise their concerns through Speak Up themselves**. Direct engagement can help with the efficiency of the investigation. If they are unsure of the process you should help and direct them towards the Speak Up guidance in this document where they can find further information.

If the employee doesn't want to report their concern themselves through Speak Up, **you can offer to do it on their behalf**.

Line Managers: How to raise a concern on behalf of someone else

Everyone should access and use Speak Up in the same way. However, there are a few additional points for those who wish to raise concerns on behalf of others (for example line managers) to consider before, during and after raising a concern.

Before raising a concern

- Encourage the employee to give you as much detail as possible.
- Ask if the employee wishes to remain anonymous. *Note: We will be better able to protect an employee from detriment where their identity is known. This information will be treated confidentially.*
- **Do not conduct your own investigation** or try to obtain proof before you raise a concern on behalf of an employee. You do not need to have proof that the activity being reported has been, is being or is likely to be committed, however, investigators may request specific account or appointment details, for example.

When raising a concern through Speak Up

- Do not share the Report Key and/or Password with anyone, including the employee who originally raised the concern with you.
- Whilst you can choose to remain anonymous, we would encourage you to provide your details to allow us to get in touch with you if further information is required. Your details and those of the reporter (if provided) will be treated confidentially but there may be times when we are required to reveal identities, for example, where personal evidence is essential for a court case as a witness. In such cases we will discuss with you the most appropriate way to proceed.
- If you or the employee wish to remain anonymous, be sure to remove any personal information from the report which may identify you.

After raising a concern

- Confirm to the employee that you have raised the concerns on their behalf through Speak Up.
- Advise them of the next steps in the process, using this document to assist you.
- Provide the employee with updates as required throughout the investigation process, particularly upon closure to ensure they know the outcome.

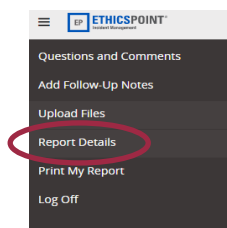
Can I see a copy of my original report?

Yes, the easiest way to review your original report is to log into the **“Follow Up”** section of the online Speak Up portal and select **“Report Details”** from the left-hand menu as highlighted below. This will show you a copy of the questions you answered when submitting your report.

If you made a report by phone, we would always advise you to review your report following submission to ensure it provides an accurate and complete account of your call.

If any inaccuracies are identified, these can be highlighted through the **“Follow Up”** process detailed below.

You will also be able to see all other communication handled through the **“Follow Up”** element of the Speak Up service.



Can I provide further information or an update to my submitted report?

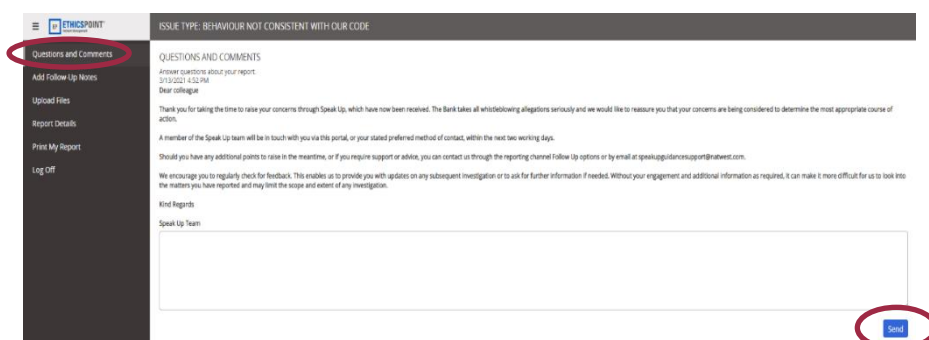
Yes, you can provide an update on the **“Follow Up”** section of the online Speak Up portal using your unique Report Key and Password to log in, which you will have been asked to set up when you submitted your original report. Without these credentials, you will be unable to update an

existing report or communicate through the Speak Up service anonymously. **It is very important to keep a safe record of your report key and password.** If you have provided your contact details, and not chosen to remain anonymous, we can contact you directly if you forget your log in details.

After receiving your report, we may require further information from you to look into your concerns. You can provide additional information in three ways:

1. **“Questions and Comments”** tab:

- This allows you to read and respond to messages from the Speak Up Team / Investigations Team through the online portal.
- When you first log in, you will see an automatic acknowledgement from the Speak Up Team, thanking you for raising your concerns and advising on next steps.
- To respond to any messages raised by the Speak Up Team or Investigations Teams, simply start typing a response in the empty box underneath the message as highlighted below then hit **“Send”**.
- Alternatively, you can contact the person sending you a message directly (by phone or email).

A screenshot of the 'Questions and Comments' tab in the Speak Up portal. The left sidebar contains a menu with 'Questions and Comments' highlighted in red. The main content area shows a message from the Speak Up Team dated 31/10/2021 at 12:52 PM. Below the message is a large text input box for a response. At the bottom right of the input box is a blue 'Send' button, which is circled in red.

2. **“Add Follow Up Notes”** tab: This allows you to get in touch with the Speak Up Team / Investigations team to provide additional information as and when required.

3. **“Upload Files”** tab: This allows you to share supporting documents, screenshots, or photos to help demonstrate your concerns.

Will anyone be able to identify me?

The Speak Up reporting service is operated by a third party, Navex, so if you make an online or phone report through the service, NatWest would have no way of identifying you. However, if you wish to remain anonymous, you - as the reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, *“I sit next to John Smith...”*.

You have a choice to report:

- **Anonymously** - meaning you don't provide your contact details; or
- **Confidentially** – where you provide your contact details to enable contact to be made directly by the Speak Up Team and Investigation Team.

We would encourage you to report confidentially rather than anonymously, as this makes communicating with you easier and facilitates a more efficient investigation into your concerns.

If you decide to remain anonymous, communication with you would be via the secure **“Follow Up”** section of the Speak Up portal. You will need to remember your Report Key and Password to access the Speak Up portal.

Whether you are anonymous or not, the Speak Up case management system, which holds all reports raised, has very restricted access and is designed to protect your identity. Whilst your identity will be known by those involved in managing and investigating your concerns, it will remain confidential. Unless required by law, your identity, or any other information from which your identity could be deduced, will only be disclosed to others (for example the subject of your concerns and/or your line manager) with your consent.

Occasionally, depending on the nature of your concern, it can be possible for people to suspect who may have raised a matter, but it is a breach of policy for individuals to make any attempts to identify a whistleblower. We will never confirm any suspicions raised about who may have submitted a report.

What happens once an investigation has been completed?

The investigator will provide you with **closure feedback** once the investigation has completed, either via the Speak Up portal or directly through your preferred method of contact.

Due to confidentiality requirements, there will be times when **we cannot share detailed information** to protect the integrity of the investigation, or the privacy of individuals being investigated. We will provide as much information as we can.

If the concerns have been **substantiated** (proven), there are several potential outcomes. One possible outcome for the investigation sponsor in conjunction with HR to request that a Conduct Report is prepared on the person(s) investigated. This would then be sent to an independent disciplinary hearer to allow them to take the most appropriate next steps, such as disciplinary action. Another could be that changes are made to bank processes, procedures, or controls to help ensure that the concern reported does not reoccur.

Depending on the nature of the concerns, the evidence available **might not be enough to decisively prove the concerns raised or to recommend further action**. This is not a reflection on the validity of the concerns raised, but rather a reflection of the evidence available.

In these instances, where concerns are not fully substantiated, this doesn't necessarily mean no action is taken, it may however be that this action is less visible to the reporter.

Is there any form of protection in place for whistleblowers?

Yes - feeling free to speak up is valued at NatWest. **We will protect anyone raising a concern** should they suffer any form of retaliation or detrimental treatment – such as harassment, victimisation, discrimination or any other mistreatment - even if the concern raised is unsubstantiated (not proven) after investigation. This could be a direct or indirect act or omission that may cause detriment to the reporting person. Protection also extends to anyone supporting the whistleblower in this process, in a work-related context.

Whistleblowing charity, Protect, consider 'detriment' to be ***“subjecting the worker to any disadvantage because they blew the whistle”***.

The **mistreatment** of anyone who raises a whistleblowing concern will be considered a **disciplinary matter** and cases of this nature will receive senior oversight from the Policy Owner. Additionally, no-one should try to identify a whistleblower. Any attempt to do so will be investigated and may result in disciplinary action. Depending on the nature of the concern being raised you may also be afforded protection against dismissal or detriment under local laws. For

example, in the UK reporters may also have additional protection under the UK legislation ***Public Interest Disclosure Act 1998 - Right not to suffer detriment.***

It's also important to note that **employees as well as the employer, can be personally liable** for claims of whistleblower detriment.

Our UK regulators, the FCA and PRA, regard detrimental treatment of those reporting whistleblowing concerns as a serious matter. This could impact on the fitness and propriety of the individual concerned and lead to both personal and professional consequences. It's important to note that regulators expect firms as well as their employees to act ethically and reasonably.

If you believe that **you have suffered any form of retaliation or detriment** because of raising your concerns, you should contact the Speak Up team so that they can offer guidance and support and arrange for the concerns to be investigated if appropriate. Alternatively, you can raise your concerns via the bank's Resolving Issues at Work Policy by raising a formal grievance.

You can find more information about Resolving Issues at Work process on the internal HR intranet page available by following this path: ***NatWest Group Intranet > Human Resources > Working Here > Resolving Issues at Work.***

It should be noted that the bank does not provide protection where allegations have been made maliciously and they are known to be untrue as we also have an obligation to protect the subject of such reports. Additionally, whilst you are offered protection in respect of the information provided in a Speak Up report, you will not be protected from disciplinary action arising from personal wrongdoing.

Line Managers: How to help protect the reporter

You have a responsibility as a line manager to ensure that no detrimental treatment is suffered as a result of the employee raising their concerns. It is important to remember that this could be a direct or indirect act or omission that may cause detriment to the reporting person.

Any discussions you have about whistleblowing concerns must be in private. Documentation must be kept safe, in line with the Records Management Policy.

If you need any support in protecting a colleague from detriment, please contact the Speak Up team.

It important to note that employees, as well as the employer, can be **personally liable** for claims of whistleblower detriment. This means that you could be personally liable for any damages paid if whistleblower detriment was proven in a tribunal.

What if I am a witness or the subject of a Speak Up investigation?

All employees should be treated fairly, and this includes the subjects of investigations and those acting as witnesses.

Subjects

If you are investigated as a 'subject' under the Speak Up process, your confidentiality will be protected as far as is reasonably possible, subject to any applicable laws.

You may be contacted to advise that a concern has been raised and the investigator may request a meeting to discuss the allegations to understand your perspective. All employees interviewed have the right to review and request amendments to a written statement produced by the investigator.

If you are investigated or interviewed as a subject, you will be formally advised of the outcome and any subsequent action being taken. Your line manager may also be informed.

If the concerns raised are not substantiated, you will be entitled to continue in your role as if no concern was raised. In some circumstances, if the investigation was widely known about, a statement may be issued to exonerate you.

If at any time you believe that you have been treated unfairly, you can raise a grievance through the HR Resolving Issues at Work process.

Further guidance on the investigation process is documented in the Disciplinary Support pack which can be accessed on the internal HR intranet page, available by following this path: **NatWest Group Intranet > Human Resources > Working Here > Disciplinary.**

Witnesses

If you are interviewed as a 'witness' under the Speak Up process, your confidentiality will be protected as far as is reasonably possible, subject to any applicable laws. We make it clear that the meeting is 'on the record' and the information you provide may be used in other Investigation meetings.

Please note that witness statements cannot be submitted anonymously.

All employees interviewed have the right to review and request amendments to a written statement produced by the investigator.

You will not be formally advised of the outcome of the investigation, or any appropriate action subsequently taken but will be told when the investigation has concluded.

If you believe you have suffered any form of detrimental treatment as a result of supporting the investigation process, please report this directly to the Speak Up team who can provide guidance and support; and can arrange for the concerns to be investigated if appropriate. Alternatively, you can raise your concerns via the bank's Resolving Issues at Work Policy by raising a formal grievance.

Line Managers: What do I need to consider for those named in a Speak Up report, either as a subject or a witness?

First and foremost, all employees will be treated fairly. If any of your direct reports are investigated under the Speak Up process, their confidentiality will be protected as far as is reasonably possible, subject to any applicable laws.

An employee who is being investigated may be contacted to tell them about the concern that's been raised. You may also be contacted as their line manager to make you aware of the issue and for you to make arrangements if the employee is required to be out of the office for interview by Investigations.

As a minimum, you would be expected:

- To provide appropriate support to the employee.
- Not to hinder the investigation process.
- Encourage the employee to provide as much information to the investigator as possible.

The investigator may request a meeting to discuss the allegations and understand the employee's perspective.

It's worth remembering that all investigations are confidential and should not be discussed openly with people who are not aware of or involved in the investigation. Please continue to support your employees as you would normally and direct them to the internal HR Wellbeing intranet page for support if required. This is available by following this path: **NatWest Group Intranet > Human Resources > Wellbeing.**

Further Information

The Speak Up Policy and internal Speak Up intranet page (if accessible to you) provide further information on the topic of whistleblowing. Please follow this path to access the NatWest internal intranet Speak Up page: **NatWest Group Intranet > Useful Sites > Policies > Speak Up.**

Employees may also find it useful to refer to the HR Wellbeing information available on the internal intranet for advice and support on several wellbeing related matters. This is available by following this path: **NatWest Group Intranet > Human Resources > Wellbeing.**

For individuals in the UK, you may also wish to contact Protect - an independent whistleblowing charity who can provide free, confidential advice on raising a concern. Their website can be accessed by clicking on this link: <https://protect-advice.org.uk/>, or you can contact them by phone on 0044 (0) 203 117 2520 or by emailing: whistle@protect-advice.org.uk.

We hope this guide and the other information available about Speak Up available through the Speak Up service helps you understand the framework we've put in place to help your voice be heard. If you have any feedback on the Speak Up process or service, or you would like to discuss any queries you have, you can contact the Speak Up team by emailing:

Internally: ~ **Speak Up Guidance & Support**

Externally: speakupguidancesupport@natwest.com

Appendix 1 – UK Definitions

The Legal Definition

The **legal definition** of whistleblowing comes from the Employment Rights Act 1996 (ERA). Under this definition, individuals are protected from detrimental treatment, as long as the **concerns raised are in the public interest and relate to one or more** of the following:

- A criminal offence has been committed, is being committed or is likely to be committed;
- A person has failed; is failing or is likely to fail to comply with any legal obligation to which he is subject;
- A miscarriage of justice has occurred; is occurring or is likely to occur;
- The health or safety of any individual has been, is being or is likely to be endangered;
- The environment has been, is being or is likely to be damaged; or
- Information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

Concerns that meet **at least one of these** are considered to be ‘qualifying disclosures’.

Further to this, the **Public Interest Disclosure Act 1998 (PIDA)** is in place to “*protect individuals who make certain disclosures of information in the public interest*” and “*allow such individuals to bring action in respect of victimisation*”.

Three key points in relation to PIDA are as follows:

1. It is **immaterial whether the activity occurred**, occurs or would occur in the United Kingdom (UK) or elsewhere, and whether the law applying to it is that of the UK or of any other country;
2. A disclosure of information is not considered to be a qualifying disclosure if the person raising the concern commits an offence by doing so; and
3. Disclosures **must be raised in the correct way to receive protection**. In our case, internal disclosures can be made via Speak Up.

The disclosure qualifies irrespective of where the activity occurred, occurs or would occur, and whether the law applying to it is that of the United Kingdom or of any other country.

The Regulatory Definition

The **regulatory term** for whistleblowing is a ‘**reportable concern**’. It is contained within regulations imposed by the UK regulators; the Financial Conduct Authority (FCA) and Prudential Regulatory Authority (PRA).

The definition of what constitutes a ‘reportable concern’ is wider than the legal definition, covering:

- (a) Anything that would be the **subject-matter of a protected disclosure**, including breaches of regulatory rules;
- (b) A **breach of the firm’s policies** and procedures; and
- (c) **Behaviour that harms or is likely to harm the reputation** or financial well-being of the firm.

Individuals raising a ‘reportable concern’ are afforded protection under the FCA and PRA regulations. These state that “*the firm’s arrangements must include reasonable measures to ensure that, if a reportable concern is made by a whistleblower, no person under the control of the firm engages in victimisation of that whistleblower*”.