



NatWest  
Group

# Our Code For UBIDAC

**We support our  
colleagues and  
customers now and help  
them prepare for the  
future and finish well.**

# **This is Our Code**

When we do the right thing, our customers trust and value us, which in turn means we can all take pride in the company we work for.



**We each carry the responsibility to ensure we act with integrity and ensure we live by our purpose, values and behaviours.**

Our Purpose-led business strives to put the needs of people and planet at the heart of everything we do. This includes our colleagues, customers, suppliers, communities and shareholders. To do this, we operate as one team, building a Bank that is safe, simple and smart.

This is why the integrity of Our Code rests in the hands of every individual in NatWest Group and we carry the same responsibility to each other to ensure we live by our purpose, values and behaviours. Whether you're a permanent colleague, contractor, agency or temporary worker.

Our Customer Charter sets out how we will continue to support our customers and communities as we navigate the phased withdrawal of Ulster Bank from the Republic of Ireland.

Our Supplier Charter sets out our aims and expectations in terms of ethical business conduct, human rights, environmental sustainability, bullying and harassment and diversity and inclusion. It details what we expect from our suppliers, but more importantly now clearly outlines what our own commitments are in these key areas and the outcomes we will aim to achieve by working together.

Living our purpose, values and behaviours creates and promotes a positive working environment free from bullying, harassment and discrimination.

At NatWest we won't tolerate any form of discrimination related to sex, race, age, religion, origin, disabilities, marital status, sexual orientation, or social condition, and encourage anyone to speak up if they don't see our purpose in action. We will treat any allegation seriously and sensitively, and have in place robust policies and procedures to manage instances should they occur.

So, Our Code is for everyone. It sets out what we expect of each other, and what our customers, suppliers, shareholders and the communities in which we're part of expect of us. For now, and for future generations.

**This is Our Code. It helps each and every one of us do the right thing. Please use it.**

# What we believe

## Our Purpose

We support our colleagues and customers now and help them to prepare for the future and finish well.

## Our Focus

Our focus is to support our colleagues, customers and communities throughout the withdrawal process.

We will maintain stability and safely withdraw from the market while supporting customers and communities and building colleague skills for a future outside Ulster Bank.

## Our Values

### Inclusive

We work together to achieve great things with our colleagues, communities and customers.

We celebrate and respect everyone's strengths and differences and share our knowledge and experiences.

We are committed to nurturing a fair and inclusive environment where we all feel we belong.

### Curious

We experiment and explore with relentless curiosity and broad perspectives.

We deliver One Bank value through innovation.

We are courageous and creative innovators, who try new things.

**Inclusive**  
**Curious**  
**Robust**  
**Sustainable**  
**Ambitious**

**We are all different but share the same purpose-led focus and values.**

### Robust

We act with integrity and take risk intelligently.

We strive to keep our colleagues, customers and communities safe and secure.

We solve problems and deliver the best outcomes.

### Sustainable

We care deeply about our impact on people and the planet.

We show empathy, build relationships in a digital world and are at our customers' sides throughout their lives.

We act responsibly for the long-term.

### Ambitious

We are role models for the change we want to see – Guided by our Purpose.

We prioritise wellbeing and learning for ourselves and others.

We set high standards for ourselves and others to achieve outstanding results.

**All this comes together in Our Code.**



# How we work

**Four key tools guide the way we work together.**



## Our Code

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### How we work

This lays out our purpose and the values and behaviours we expect from each other.

## The YES Check

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### How we make decisions

This guides the way we think and the judgements behind our decisions and actions.

## Our Conduct Rules and Critical People Capabilities

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### How we behave

The Conduct Rules and Critical People Capability (CPC) Behaviours describe 'how' we should approach our jobs. They show us how to behave every day.

## Our Policies

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### How we do things

These inform how we do things. They outline the expectations of the Bank, customers and regulators, and processes and procedures that must be followed.

# How we make decisions



## The YES Check

Our customers, colleagues and the communities in which we do business trust each of us to be thoughtful and professional in everything we do.

They expect each of us to exercise good judgement and to do the right thing.

We use our purpose and values to help guide our decisions. When in doubt, we use the YES check to help us ask the right questions and make the best decisions every day.

Decisions are not always straightforward. The YES Check can help us to challenge, check and truly champion potential.

## Ask yourself...

### 1 Would others say I am acting with respect and integrity?

**Consider:** What would your family, friends, colleagues and community think?

### 2 Does what I am doing keep the Bank, our customers and communities safe and secure?

**Consider:** If you presented this decision to a group of savers or shareholders, would you be seen as taking due care?

### 3 Am I acting fairly and being inclusive?

**Consider:** What are you trying to achieve? Have you considered everyone affected by this decision including the underserved or excluded?

### 4 Have I sought out, listened to and taken different perspectives into account?

**Consider:** What assumptions have you made? Have you been curious and tested your thinking on people with different views and looked at different data?

### 5 Will this advance our purpose to champion potential and help people, families and business thrive?

**Consider:** How? Try writing the press release. Does it sound good to customers and communities? What is the impact on future generations?

# How we behave

The Conduct Rules reinforce Our Values. They hold us to account for our actions and behaviours. They apply to us all no matter which part of the Bank you work in.



The Financial Conduct Authority (FCA) sets out expectations of individual behaviour through a clear set of regulatory Conduct Rules.

In Ulster Bank Ireland DAC the Central Bank of Ireland (CBI) sets out expectations of individual behaviour through a clear set of regulatory Common Conduct Standards applicable to all individuals in scope for Fitness & Probity.

If you are in scope for Fitness & Probity, the UBIDAC Fitness & Probity team will provide the tools, mandatory procedures and advice to support you to comply with the CBI Individual Accountability Framework which includes the Conduct Standards and the Fitness & Probity Standards.

The Central Bank of Ireland expects that customers of Ulster Bank Ireland DAC are treated fairly and with respect and dignity, and that we act in the consumers' best interests in all that we do. The CBI Consumer Protection Code sets out general principles that we are expected to follow.

Living by these Individual Conduct Rules, together with our purpose, our values, YES check and policies, ensures we are taking individual accountability to:

Deliver fair outcomes for all stakeholders.

Build trust in our Bank for our colleagues, customers, suppliers, communities and shareholders.

Meet our regulatory obligations.

## Individual Conduct Rules

1. You must act with integrity
2. You must act with due skill, care and diligence
3. You must be open and cooperative with the Financial Conduct Authority (FCA), the Prudential Regulation Authority (PRA), and other regulators
4. You must pay due regard to the interests of customers and treat them fairly
5. You must observe proper standards of market conduct
6. You must act to deliver good outcomes for retail customers\*

\*retail customers in the conduct rules is the FCA's definition, which is broader than our internal Retail Banking customer population.

The FCA and CBI also sets out clear expectations for our most senior leaders, and a further set of regulatory Conduct Rules and standards apply to them. If you are affected by these, you will receive information and support on an individual basis.



# How we behave

## Critical People Capabilities

The CPC skills and behaviours set clear expectations on what is consistently required from us all. They explain how we need to work every day and are aligned to our purpose, values and risk culture. They will help you build your capability for a successful career both now and in the future.

Guiding how we behave today and preparing us for the future.



**Inclusive**

## Connected

**Curious**

## Improver innovator

**Robust**

## Critical thinker

**Sustainable**

## Trusted advisor

**Ambitious**

## Change ready

# How we behave

## Inclusive

### Connected

#### Skills & Behaviours

- Valuing differences
- Collaborating
- Team working
- Communication
- Community connections

## Curious

### Improver innovator

#### Skills & Behaviours

- Creative thinking
- Continuous improvement
- One Bank thinking
- Digital literacy
- Working at pace
- Agile methodology

## Robust

### Critical thinker

#### Skills & Behaviours

- Understanding problems
- Decision making
- Data literacy
- Challenging decisions
- Strategic thinking
- Cyber safety

## Sustainable

### Trusted Advisor

#### Skills & Behaviours

- Building relationships
- Focusing on customers
- Considering others
- Doing the right thing
- Taking ownership
- Expertise

## Ambitious

### Change ready

#### Skills & Behaviours

- Resilience and wellbeing
- Adaptability
- Self-directed learning
- Learns from experience
- Constructive feedback
- Coaching
- Achieving results



# How we do things

The Bank's policies describe in more detail the rules that everyone is expected to follow.



By following our policies, our approach to risk management is consistent and will keep us and our customers safe and secure. We also have local country policies which align to country laws and regulations.

We take personal responsibility for ensuring we are familiar with the Bank's policies relevant to our role.

## Some of the key policies and guidance are

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- Anti-bribery and Corruption
- Anti-money laundering
- Complaints Management & Errors Management
- Customers In Vulnerable situations
- Financial Crime
- Fitness and Probity
- Health, Safety and Environment
- Managing conflicts, Inside information and Personal Account Dealing
- Managing Records
- Performance Management
- Privacy and Client Confidentiality
- Security
- Speak Up

They ensure we comply with the legal and regulatory requirements that are critical in a highly regulated industry.

# How we do things

We all have a responsibility to speak up if something is wrong.

We all have a responsibility to speak up if something is wrong and will affect NatWest Group, its customers, colleagues, suppliers, shareholders or the public.

This includes behaviour that is not in line with Our Code, breaches our internal policies and procedures, breaches our regulatory requirements, or is illegal.

Anyone raising a concern is acting in accordance with NatWest Group values.

You do not need to have proof that the activity being reported has been, is being or is likely to be committed.

## How to speak up

You can raise your concerns with a colleague, through your line management or through the dedicated whistleblowing service 'Speak Up'.

Speak Up is a confidential 24/7 telephone and online reporting service operated on behalf of NatWest Group by a third-party supplier. Reports can also be made directly to the Speak Up team via email or letter. Alternatively, a physical meeting to raise your concerns can be arranged upon request. The most efficient way to raise your concerns is online.

The Speak Up framework is designed to provide a safe and secure environment to speak up, enabling you to raise any concern you may have about wrongdoing or misconduct at an early stage and in the right way.

All concerns raised through Speak Up are treated confidentially, meaning that your name and contact details will not be shared outside of the Speak Up investigation unless required for legal purposes. However, you do have the option to remain anonymous if you would prefer not to share your name or contact details.

**Speak Up.**

The bank's confidential whistleblowing service.

**See something?**



**Hear something?**



**Say something.**



# **How we do things**

## **Speak Up**

### **The bank's confidential whistleblowing service**

#### **How to contact us**

Visit the Speak Up intranet page for more information, including our Speak Up Policy and contact details for raising a concern through Speak Up.

NatWest Group treats whistleblowing seriously. We will consider every concern reported.

Where appropriate, we will allocate an independent investigator to examine the issues raised to establish the underlying facts. Depending on the investigation findings, appropriate and proportionate action will be taken to address any issues identified.

You will be protected should you suffer any form of detrimental treatment – Including harassment, victimisation or discrimination – As a result of raising genuine concerns. The mistreatment of anyone raising a concern will be viewed as a disciplinary matter.

Depending on the nature of the concern being raised you may also be afforded protection under local laws. For example, in the UK, employees may also have additional protection under local country laws.

You can also report your concerns directly to the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA) in the UK, Central Bank of Ireland (CBI) or a local country regulator.

Reporting to the 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.

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**To find out more, visit:**  
**Intranet > Useful sites > Speak Up**

# How we do things



**Health and wellbeing at work is as important to the Bank, as it is to the individual concerned.**

Health and wellbeing at work is as important to the Bank as it is to the individual concerned.

Supporting colleagues' mental, physical, social and financial wellbeing is key to us all achieving our Purpose. The Wellbeing Hub provides a vast range of support covering each of our pillars of wellbeing.

Our Employee Assistance Programme can provide advice, information, support and counselling services which are free and confidential for all colleagues. It's a helpline and/or online service provided by an independent specialist supplier and can be accessed 24 hours a day, seven days a week.

## How to contact us

For the helpline contact details go to Human Resources > Wellbeing and select your region.



**Inclusion is at the heart of everything we do at the Bank.**

Inclusion is at the heart of everything we do for our colleagues, our customers and the communities we serve.

By threading it through our organisational values and holding our leaders accountable through our objectives and goal setting processes, we are focused on continuing to create a diverse and inclusive organisation which is reflective of society.

## How to contact us

To find out more please go to Human Resources > Diversity, Equity and Inclusion or if you want to join one of our Employee Led Network please go to About the Bank > This is us > Employee Led Networks